

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF BLUEGRASS WIRELESS LLC,)	
KENTUCKY RSA #3 CELLULAR GENERAL)	
PARTNERSHIP, KENTUCKY RSA #4)	
CELLULAR GENERAL PARTNERSHIP,)	CASE NO.
AND CUMBERLAND CELLULAR)	2020-00359
PARTNERSHIP TO RELINQUISH ELIGIBLE)	
TELECOMMUNICATIONS CARRIER)	
DESIGNATIONS)	

STATUS UPDATE

Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership, Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular Partnership (collectively, “Bluegrass Cellular”), by counsel, and in supplement to their petition filed in the above-styled matter on November 5, 2020 (the “Petition”), hereby respectfully state as follows.

1. Consistent with 47 U.S.C. § 214(e)(4) and other applicable law, Bluegrass Cellular has requested the Commission’s authorization to relinquish designations as eligible telecommunications carriers (“ETC”) in all Kentucky markets currently served by Bluegrass Cellular (the “Markets”). As explained in the Petition, this relief is sought in connection with the acquisition of Bluegrass Cellular by Verizon Communications Inc. (“Verizon”), pursuant to an agreement entered into on October 19, 2020. That transaction was previously expected to close on or about December 31, 2020; it is presently expected to close during the first quarter of 2021.

2. In connection with the transaction, Bluegrass Cellular intended to wind down its Lifeline services in Kentucky as of December 21, 2020, and provided notices to that effect to each of its Lifeline customers (totaling 38 accounts) on or about November 5, 2020.¹ Those notices

¹ See Petition, at Exhibit A (notice by letter) and Exhibit B (notice by SMS text message).

explained the options available to Lifeline customers to ensure continued Lifeline or comparable service beyond December 21, 2020 (either with Verizon or an available ETC in the Markets). Those notices also provided customers a toll-free telephone number to contact Bluegrass Cellular's customer service representatives for assistance with transition. As of the date of this filing, Bluegrass Cellular continues to serve thirty-five (35) Lifeline customers.

3. In order to best serve its customers and better coordinate with the newly anticipated closing of the relevant transaction with Verizon, Bluegrass Cellular no longer intends to discontinue Lifeline services effective December 21, 2020. Instead, Bluegrass Cellular intends to continue as an ETC offering Lifeline services in Kentucky into 2021 and until the transaction with Verizon nears closing. Therefore, Bluegrass Cellular respectfully requests that the Commission presently refrain from issuing an Order approving the relinquishment of Bluegrass Cellular's ETC status on a date certain, pending further notification from Bluegrass Cellular regarding the anticipated closing of the transaction with Verizon.

4. While Verizon's acquisition of Bluegrass Cellular progresses towards closing, Bluegrass Cellular intends to remain in communication with both its Lifeline subscribers and the Commission in order to promote a smooth transition that avoids service interruptions or other issues. To that end and in conjunction with this filing, Bluegrass Cellular has sent its Lifeline customers a second set of notices—attached hereto at Exhibit A (letter notice) and Exhibit B (SMS text message notice)—explaining the temporarily-continued availability of Lifeline services through Bluegrass Cellular, promising additional information as it becomes available, and again offering assistance with ensuring ongoing service coverage or other questions. Bluegrass Cellular will also continue assisting with transitions to other Lifeline providers upon subscriber request.

5. Upon a determination by Bluegrass Cellular of the rescheduled date on which it intends to discontinue the provision of Lifeline services in the Markets, and in no event less than thirty (30) days prior to such planned discontinuance of Lifeline services, Bluegrass Cellular will provide its Lifeline customers timely notice thereof in a form substantially similar to that attached to its original Petition. Furthermore, upon the Commission's grant of Bluegrass Cellular's Petition herein (or at such other time as the Commission may direct), Bluegrass Cellular will again communicate with its remaining Lifeline subscribers via letter and SMS text message in order to confirm arrangements are in place to ensure continued service.² Finally, Bluegrass Cellular commits to filing in this docket all future notices it sends to Lifeline subscribers in connection with this transition, and will provide the Commission additional status updates (i) on or before January 19, 2021; (ii) at least thirty (30) days in advance of the anticipated closing of the transaction with Verizon; and (iii) as appropriate, should circumstances warrant.

Respectfully submitted this 17th day of December, 2020.

/s/ **Edward T. Depp**

Edward T. Depp

John E. Selent

M. Evan Buckley

DINSMORE & SHOHL LLP

101 S. 5th Street, Suite 2500

Louisville, Kentucky 40202

(502) 540-2300 (telephone)

(502) 585-2207 (fax)

Counsel to Bluegrass Cellular

² In the event an attempted notification sent by Bluegrass Cellular is returned as undeliverable or otherwise believed to have gone undelivered, Bluegrass Cellular will undertake additional reasonable measures, including direct telephone calls, in an effort to contact the Lifeline subscriber(s).

EXHIBIT A
NOTICE LETTER II

[BLUEGRASS CELLULAR LETTERHEAD]

December 17, 2020

[Customer Name]
[Address]
[City, State & Zip Code]

RE: Your Lifeline Benefits through Bluegrass Cellular

Dear Valued Customer,

On or about November 5, 2020, we attempted to notify you by letter and text message that certain assets of Bluegrass Wireless LLC, Kentucky RSA #3 Cellular General Partnership, Kentucky RSA #4 Cellular General Partnership, and Cumberland Cellular Partnership (collectively, “Bluegrass Cellular”) are being acquired by Verizon Communications Inc. (“Verizon”), and that, in connection with the acquisition, Bluegrass Cellular will no longer offer the Lifeline Program in Kentucky. We had expected the discontinuance of the Lifeline Program to be effective December 21, 2020, but are pleased to inform you that date has been extended indefinitely.

At this time and into 2021, your existing Lifeline benefits will continue through Bluegrass Cellular without further action on your part. In the coming weeks or months, we will attempt to send you an additional notice that includes the rescheduled date for the discontinuance of the Lifeline Program by Bluegrass Cellular. That notice will again include your options to ensure continued service.

Should you have any questions or need further assistance at this time, please call a member of our Customer Service team at 1-800-928-2355. We truly thank you for being a customer of Bluegrass Cellular, and we wish you nothing but health and happiness in the days to come.

Sincerely,

Bluegrass Cellular Lifeline Support

EXHIBIT B

NOTICE SMS TEXT MESSAGE II

“Bluegrass Cellular is pleased to inform you that we will extend our Lifeline Program into 2021. Therefore, at this time, your existing Lifeline benefits will continue through Bluegrass Cellular without further action on your part. In the coming weeks or months, we will attempt to notify you of the rescheduled date for the discontinuance of our Lifeline Program and remind you of your options to ensure continued service. Questions? Call us at 1-800-928-2355.”

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