

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF T-MOBILE CENTRAL)	
LLC AND POWERTEL/MEMPHIS, INC. FOR)	
CONVERSION OF ITS HIGH-COST)	
ELIGIBLE TELECOMMUNICATIONS)	
CARRIER DESIGNATION AND FOR)	CASE NO. 2020-00415
RELINQUISHMENT OF ITS MOBILITY)	
FUND I ELIGIBLE TELECOMMUNICATIONS)	
CARRIER DESIGNATION PURSUANT TO 47)	
U.S.C. § 214(E)(4))	

RESPONSE OF
T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

FILED: February 1, 2021

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF FAYETTE)

The undersigned, Chris Miller, being duly sworn, deposes and states that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Chris Miller
Sr. Vice President Tax
T-Mobile USA, Inc.

Subscribed and sworn to before me, a Notary Public in and before said County and State,
this _____ day of February, 2021.

Notary Public

My Commission Expires: _____

Notary ID: _____

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
Case No. 2020-00415**

Question No. 1

Responding Witness: Chris Miller

- Q-1. Confirm that T-Mobile requests the Commission to grant relinquishment of T-Mobile's Eligible Telecommunications Carrier (ETC) designation for the area in which it was designated for purposes of participating in the Mobility Fund Phase I Auction for both high-cost and low-income funding.**
- A-1. Correct. T-Mobile requests that the Commission grant relinquishment of its Mobility Fund Phase I Auction ETC designation (SAC 268020 and 268021). T-Mobile additionally requests that the Commission grant conversion of its High Cost ETC designation (SAC 269024) to a Low Income (Lifeline) only designation.

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
Case No. 2020-00415**

Question No. 2

Responding Witness: Chris Miller

- Q-2. Confirm that T-Mobile does not seek to offer Lifeline service to customers in the area in which it was designated for purposes of participating in the Mobility Fund Phase I Auction.**
- A-2. Correct.

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
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Question No. 3

Responding Witness: Chris Miller

Q-3. Provide the number of Lifeline customers that T-Mobile serves in the area designated by the Mobility Fund Phase I Auction. If the number is not zero, provide the plan to notify Lifeline customers that it will no longer provide service.

A-3. 0

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
Case No. 2020-00415**

Question No. 4

Responding Witness: Chris Miller

Q-4. Provide the number of Lifeline customers that T-Mobile serves outside the area designated by the Mobility Fund Phase I Auction.

A-4. 18

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
Case No. 2020-00415**

Question No. 5

Responding Witness: Chris Miller

Q-5. Confirm that T-Mobile has procedures in place to limit offering Lifeline service to areas outside of the Mobility Fund Phase I Auction area.

A-5. T-Mobile has procedures in place to ensure that only qualified consumers that reside in areas where T-Mobile is authorized to offer Lifeline are enrolled in its Lifeline program.

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

**Response to Commission Staff's First Request for Information
Case No. 2020-00415**

Question No. 6

Responding Witness: Chris Miller

Q-6. Confirm that T-Mobile does not seek to provide Lifeline service statewide subject to wireless coverage.

A-6. T-Mobile is not seeking in this petition to expand its Low Income (Lifeline) only designated service area.