

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF TOTAL CALL MOBILE,)	
INC. FOR LIMITED DESIGNATION AS)	CASE NO.
AN ELIGIBLE TELECOMMUNICATIONS)	2014-00268
CARRIER)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TOTAL CALL MOBILE, INC.

Total Call Mobile, Inc. ("Total Call"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 24, 2014. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Total Call shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Total Call fails or refuses to furnish all or part of the requested information, Total Call shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. If the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Confirm that Total Call does not seek to receive funds from the Kentucky Universal Service Fund (“USF”) for the provision of Lifeline service to Kentucky customers.

2. Refer to page 4 of the Application, which states that Total Call “intends to be the leader in the wireless marketplace by offering exceptional value and competitive amounts of voice usage at all price points to consumers.” Compare and contrast Total Call’s service offerings to those of other Lifeline providers.

3. Throughout the Application and Exhibits, Total Call references tribal and non-tribal customer plans. Kentucky does not have any tribal lands as defined by 47 C.F.R. § 54.400(e). Confirm that Total Call’s inclusion of plans to customers in tribal lands in the Application was inadvertent.

4. Refer to page 7 of the Application. Describe Total Call’s proposed in-person events that it will use to sign up Lifeline customers.

5. Refer to page 7 of the Application, which states that Total Call’s “distribution network” will be used to provide information to applicants for Lifeline service. Describe Total Call’s “distribution network.”

6. Refer to page 7 of the Application, which states that Total Call has a 90-day non-usage policy. Explain how this complies with 47 C.F.R § 54.407 (c)(2), which requires a 60-day non-usage policy.

7. Refer to pages 14-15 of the Application, which detail how Total Call will advertise the availability of supported services. Provide further explanation describing Total Call's marketing plan and the inclusion of print, radio, and television advertisements, if any.

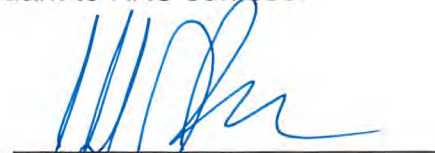
8. Refer to page 16 of the Application, which states that Total Call can provide service in every Zip Code in Kentucky. Provide maps or other documentation that demonstrate that Sprint PCS, the underlying carrier of Total Call, provides service in every Zip Code in Kentucky.

9. For each state in which Total Call has been designated as an Eligible Telecommunications Carrier for the purpose of offering Lifeline service, provide the percentage of Lifeline customers as compared to total customers in each state.

10. Confirm that Total Call will collect or otherwise contribute \$.08 per line per month to the Kentucky USF for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

11. Confirm that Total Call will collect or otherwise contribute \$.04 per line per month to the Kentucky Telecommunications Relay Service/Telecommunication Access Program Fund for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

12. Confirm that Total Call will contribute to the Commercial Mobile Radio Service Emergency Telecommunications Fund pursuant to KRS 65.7635.



Jeff Derduen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 24 2014

cc: Parties of Record

Robert Yap
Chief Legal Officer
1411 W. 190th Street, Suite 700
, CALIFORNIA 90248

Mark S Yurick
Taft Stettinius & Hollister, LLP
65 E. State Street, Suite 1000
Columbus, OHIO 43215