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September 30, 2014

VIA E-FILING AND HAND DELIVERY

Catrice Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: DTC Docket No. 13-4 – Investigation by the Department on its Own
Motion into the Implementation in Massachusetts of the Federal
Communications Commission’s Order Reforming the Lifeline Program

Dear Ms. Williams:

Boomerang Wireless (“Boomerang”) respectfully files an original and three (3) copies of this letter in lieu of Reply Comments addressing the September 15, 2014 filings made by docket participants in Phase II of the above-referenced case.

Boomerang has reviewed the Initial Comments of Budget PrePay, Inc. d/b/a Budget Mobile (“Budget”), TracFone Wireless Inc. (“TracFone”), Verizon New England d/b/a Verizon Massachusetts (“Verizon MA”) and Virgin Mobile USA, L.P. (“Virgin Mobile”). The concerns expressed in these four sets of comments closely track those of Boomerang in arguing against the imposition by the Department of Telecommunications and Cable (“DTC”) of any additional regulatory requirements on providers of low-income Lifeline services. Furthermore, Boomerang strongly agrees with, and supports, all of the thoughtful concerns about the DTC’s Phase II notice raised by these commenters that addressed issues in addition to those on which Boomerang chose to focus in its Initial Comments.

Accordingly, for the reasons stated in Boomerang’s Initial Comments and in the comments of other participants, Boomerang requests that the Department not implement any of the additional regulatory requirements in the Phase II notice. Furthermore, Boomerang requests that the Department rule on the Lifeline cases

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Murtha Cullina LLP | Attorneys at Law

BOSTON

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NEW HAVEN

STAMFORD

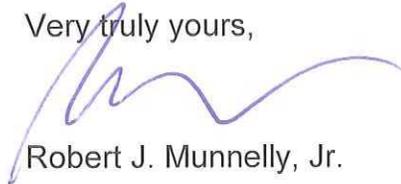
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pending before the Department as soon as is practicable. Massachusetts customers should not have to wait any longer for cost-effective, convenient Lifeline services.

Please let me know if you have any questions. A Certificate of Service is also filed herewith.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Robert J. Munnely, Jr.", written over the typed name.

Robert J. Munnely, Jr.

cc: Service List (by mail and email)