



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 12-6

July 22, 2025

Petition of Boomerang Wireless, LLC for Limited Designation as a Lifeline-Only Eligible Telecommunications Carrier

ORDER APPROVING PETITION

I. INTRODUCTION AND PROCEDURAL HISTORY

In this Order, the Department of Telecommunications and Cable (“Department”) grants the petition (“Petition”) of Boomerang Wireless, LLC (“Boomerang” or “the company”) for limited designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to 47 U.S.C. § 214(e)(2). Boomerang requests ETC designation solely to provide Lifeline service to qualifying Massachusetts consumers. The Department grants Boomerang’s Petition because the company meets the Federal Communications Commission’s (“FCC”) ETC requirements, the Department’s ETC requirements, and such designation is in the public interest.

Boomerang filed its initial Petition on August 31, 2012, but the Department stayed all ETC proceedings in 2013. With multiple pending petitions for ETC designation before it, the Department on July 23, 2020, issued a notice that required carriers that currently sought ETC status to file an affirmation of continued interest in the designation. On August 24, 2020, Boomerang filed an affirmation of interest. On September 17, 2020, the Hearing Officer issued a correspondence letter stating that the Hearing Officer would reach out to the parties in greater detail. On November 19, 2020, the Hearing Officer issued a Record Refresh Request to

Boomerang requesting: (1) a revised Petition, (2) updated docket filings, including responses to previously filed responses to the Department's Information and Record Requests, (3) any other relevant information that might have changed since Boomerang filed its Post-Hearing Brief on July 29, 2013, and (4) any other information that would assist the Department in reviewing the Petition. Boomerang failed to respond to this request. On February 5, 2024, Hearing Officer Alan Gill issued a Notice requiring Boomerang to issue a written affirmation of interest by March 5, 2024, or its petition would be denied without prejudice. On February 26, 2024, the Department received an affirmation of interest from Boomerang's attorney Rob Munnelly. Boomerang filed an amended petition with the Department on May 2, 2024. Commissioner Charles designated William Bendetson as the new Hearing Officer on June 13, 2024.

The Department issued its First Set of Information Requests to Boomerang on July 13, 2024. Boomerang responded with its answers on November 4, 2024 ("IR 1-1" through "IR 1-29") along with a Motion for Confidential Treatment. The Department issued its Second Set of Information Requests on December 16, 2024, and received its responses on January 10, 2025 ("IR 2-1" through "IR 2-6") along with a second Motion for Confidential Treatment. On January 17, 2025, the Department granted Boomerang's first Motion for Confidential Treatment. On February 5, 2025, the Department issued a Notice of Public Hearing and Order of Notice. The Department set March 6, 2025 as the date for a public and evidentiary hearing. On February 12, 2025, the Department granted Boomerang's second Motion for Confidential Treatment. The Department held a public and evidentiary hearing on March 6, 2025. See generally Transcript ("Tr."). The Department issued Record Requests on March 6, 2025, and Boomerang responded on March 24, 2025 ("RR-1" through "RR-8").

The evidentiary record consists of the Updated Petition, the Department's

Correspondence Letter to Boomerang, the Department's Record Refresh Request, Boomerang's responses to the First Set of Information Requests, Boomerang's response to the Department's Second Set of Information Requests, the Evidentiary Hearing Transcript, and Boomerang's response to the Department's Record Requests.

I. PETITION FOR ETC DESIGNATION

Boomerang has petitioned the Department for ETC designation solely to provide Lifeline service to qualifying Massachusetts consumers. Lifeline means a non-transferable retail service offering provided directly to qualifying low-income consumers, for which qualifying low-income consumers pay reduced charges as a result of application of the Lifeline support amount described in 47 C.F.R. § 54.403, and which provides qualifying low-income consumers with voice telephony service or broadband internet access service as defined in 47 C.F.R. § 54.400. 47 C.F.R. § 54.401.

State commissions, upon request and consistent with the public interest, convenience, and necessity, shall designate a common carrier as an ETC for a service area designated by the state commission if the carrier meets certain requirements. 47 U.S.C. § 214(e)(2). The FCC has emphasized that state commissions should conduct a rigorous ETC designation process. *In re Fed.-State J. Bd. on Universal Serv., Rep. & Order*, FCC 05-46 (rel. Mar. 17, 2005) (“*Universal Service Order*”) ¶ 58. For the reasons set forth below, the Department grants Boomerang's Petition.

A. Jurisdiction

In Massachusetts, the Department exercises jurisdiction over carriers pursuant to G.L. c. 159, § 12. *See In re City of Westfield Gas + Elec. Light Dep't*, D.T.C. 19-1, *Order Approving Petition* (Feb. 19, 2019); *Investigation by the Dep't on its Own Motion into the Implementation*

in Mass. of the Fed. Commc'ns Comm'n's Order Reforming the Lifeline Program, D.T.C. 13-4, *Order Opening Investigation* (Apr. 1, 2013); *Investigation by the Dep't on its Own Motion into the Lifeline & Link-Up Programs for Mass. Tel. Customers*, D.T.C. 10-3, *Order Opening Investigation* (Sept. 17, 2010); *In re T-Mobile Ne. LLC*, D.T.C. 12-4, *Order* (Aug. 30, 2012) (“*T-Mobile Order*”); G.L. c. 25C, § 8(b)(iv) (confirming the Department’s authority to designate wireless carriers as ETCs). Further, federal law grants the Department the authority to designate a carrier as an ETC. 47 U.S.C. § 214(e)(2). Accordingly, it is the Department’s responsibility to determine whether a carrier such as Boomerang meets the ETC designation requirements. *Id.*

B. ETC Requirements

In order for the Department to grant Boomerang’s request for ETC designation, Boomerang must:

- 1) Be a “common carrier” as defined by federal law. 47 U.S.C. §§ 153, 214(e)(1).
- 2) Offer to qualifying low-income consumers services that meet the minimum service standards that are required by federal law for universal service support (“the required services”). 47 C.F.R. § 54.400 *et seq.*
- 3) Have a compliance plan approved by the FCC and commit to meeting the necessary 911 requirements. *See* 47 U.S.C. § 214(e)(1)(A); *In re Lifeline & Link Up Reform & Modernization*, WC Docket 11-42, Rep & Order & Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6, 2012) (“*Lifeline Reform Order*”) ¶¶ 361-381.”
- 4) Advertise throughout its designated service area the availability of the required services and “the charges therefor using media of general distribution.” 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2).¹

¹ ETCs must “[p]ublicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.” 47 C.F.R. § 54.405(b). ETCs must indicate, using easily understood language, on all materials describing the service “that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. For the purposes of this section, the term “materials describing the service” includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms.” 47 C.F.R. § 54.405.

- 5) Certify its commitment to meet the service requirements applicable to the type of universal service support it receives. 47 C.F.R. § 54.202(a)(1)(i).²
- 6) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. 47 C.F.R. § 54.202(a)(2).
- 7) Demonstrate its ability to meet consumer protection and service quality standards. 47 C.F.R. § 54.202(a)(3).
- 8) Certify and demonstrate that it is financially and technically capable of providing the supported services. 47 C.F.R. §§ 54.201(h), 54.202(a)(4).
- 9) Certify that it will comply with:
 - (a) all federal Lifeline requirements under 47 C.F.R. §§ 54.400-54.423, and the Federal Communications Commission's *Lifeline Reform Order*;³ and
 - (b) all Department Lifeline reporting and consumer protection requirements. D.T.C. 13-4, *Order Implementing Requirements & Further Request for Comment* at Appendix (Aug. 1, 2014).
- 10) Demonstrate that its designation as an ETC is consistent with the public interest, convenience, and necessity. 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.202(b).

C. Analysis

The Department finds that Boomerang satisfies the requirements listed above.

Furthermore, the Department finds that Boomerang's designation as an ETC in the Service Area, which is the entire Commonwealth of Massachusetts, is consistent with the public interest, convenience, and necessity. Accordingly, the Department grants Boomerang's ETC designation in the Service Area for the reasons discussed below.

² Although 47 C.F.R. § 54.202 establishes requirements for ETC designation by the FCC, the Department applies these criteria to applicants for ETC designation by the Department. *In re Virgin Mobile USA, L.P.*, D.T.C. 10-11, *Order Approving Petition* at 5 (Sept. 9, 2011) ("*Virgin Mobile Order*"); *T-Mobile Order* at 17-19.

³ *In the Matter of Lifeline & Link Up Reform & Modernization, et al.*, WC Docket No. 11-42, et al., *Rep. & Order & Further Notice of Proposed Rulemaking*, FCC 12-11 (rel. Feb. 6, 2012).

1. Boomerang is a common carrier.

To meet the first ETC requirement, Boomerang must establish that it is a common carrier. 47 U.S.C. § 214 (e)(1); 47 C.F.R. § 54.201(d). Commercial mobile service providers are treated as common carriers for universal service purposes. *See* 47 U.S.C. § 332(c)(1)(A); 47 U.S.C. § 254. Boomerang provides commercial mobile telecommunications services. *See* Petition at 11. Given that the definition mentioned above applies common carrier treatment to commercial mobile services, Boomerang is a common carrier.

2. Boomerang will offer the supported services throughout the Service Area, including offering Lifeline services to low-income customers.

Boomerang must demonstrate that it will offer the supported services throughout the Service Area. 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. §§ 54.101(a), 54.201(d)(1), 54.405(a). “Supported services” include qualifying broadband services; voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; and access to emergency services (911 or E911), to the extent implemented. *See* 47 C.F.R. §§ 54.101, 54.401(a)(2).

Boomerang states it will offer broadband Internet access service (“BIAS”) in the Service Area pursuant to 47 C.F.R. § 54.101(a)(2). *See* Petition at 11. Boomerang provides BIAS to low-income consumers via resale of its underlying carrier’s mobile services. *Id.* Boomerang also states that it provides voice grade access to the public switched telephone network through the resale of its underlying carrier network *Id.* at 11. Boomerang also states it provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. *Id.* at 12. Boomerang states calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. *Id.* Boomerang is also a reseller of T-Mobile’s wireless service in Massachusetts. *Id.* at

4. This Order does not doubt that T-Mobile can provide 911 services throughout the Commonwealth of Massachusetts and therefore concludes that Boomerang can provide this service as well. Furthermore, Boomerang has about 140,000 customers in 34 states – further demonstrating the company’s ability to provide the necessary emergency services. IR 2-6. In sum, Boomerang has committed to offering, and has demonstrated that it can offer, the supported services throughout the Service Area.

3. *Boomerang’s compliance plan has been approved by the FCC and Boomerang will meet the necessary 911 requirements.*

Despite the requirement in statute that ETCs must use their own facilities, at least partly, to provide the supported services, the FCC granted forbearance from this “own-facilities” requirement contained in Section 214(e)(1)(A) for Lifeline-only ETCs meeting certain conditions. *Lifeline Reform Order* ¶¶ 368, 373, 379. In order to receive forbearance from the own-facilities requirement, a carrier must meet the following conditions: (1) the carrier must comply with certain 911 requirements and (2) the carrier must file, and the FCC must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the FCC’s Lifeline obligations. *Id.* ¶ 368.

Boomerang filed its revised compliance plan with the FCC in 2021. *See* Petition at Exh. C. In 2022, the FCC approved Boomerang’s revised compliance plan. FCC, Pub. Notice, Wireline Competition Bureau Approves the Compliance Plans of . . . Boomerang Corporation, WC Docket Nos. 09-197 and 11-42, DA 22-54. (rel. Jan. 18, 2022); Petition at 4 n.5. Boomerang’s compliance plan included its commitment to comply with the required 911 requirements. *See* Petition at Exh. C; *Lifeline Reform Order* ¶ 373. Given the FCC’s approval of Boomerang’s compliance plan, the “own-facilities” requirement does not apply to Boomerang.

4. *Boomerang will advertise the availability of the supported services in accordance with regulatory requirements.*

Boomerang must advertise the availability of supported services and charges in media of general distribution throughout the Service Area. 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2). Boomerang states it did not yet know what platforms it would use to advertise in Massachusetts. *See* IR 1-8. Boomerang, however, provided sample advertisements that it has used in other states. IR 2-2. Boomerang stated that in the past it has used neighborhood marketing events to reach targeted populations, distributed local papers at no cost to consumers, partnered with local social support organizations, engaged in social media advertising and contacted newspapers and radio stations to receive coverage for its community events. *Id.* Boomerang states that it has been most successful advertising in the field with branded marketing materials. Tr. at 27-28.

Boomerang states it will explain in clear, easily understood language the following in all marketing materials related to its Lifeline service: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the Lifeline program; (c) the documentation necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service, and is non-transferrable. *See* Petition at 14; 47 C.F.R. § 54.405(c). Boomerang also states that it does not provide enrollment representatives or their direct supervisors with any compensation based on the number of customers they enroll into the Lifeline program. *See* Petition at 24.

Other Lifeline providers previously held Lifeline in person events, targeted at locations catering to low-income residents and other public places, but such events have been largely discontinued. Potential subscribers may find one-on-one assistance in subscribing to Lifeline more useful than online subscription and verification. While personal contact serves the public

interest, the Department has previously received complaints from other state agencies and local law enforcement of sales representatives for Lifeline providers disrupting public places or the normal course of business. Boomerang must avoid aggressive or disruptive sales practices when promoting its Lifeline services in person. To this end, the Department reminds Boomerang to continue to avoid using commissioned sales agents from promoting Lifeline subscriptions. The Department encourages Boomerang to cooperate with local stakeholders in locations it intends to hold in-person events and comply strictly with local laws and regulations. The Department does not prescribe a specific method for cooperating with other State and local agencies but will consider any complaints from local and state agencies when reviewing Boomerang's continuing ETC designation.

The Department finds that Boomerang has sufficiently demonstrated that it will advertise the availability of supported services in media of general distribution throughout the Service Area. Boomerang, though, must comply with future updates to the Departments requirements in D.T.C.13-4, which potentially could further specify the manner in which online advertising must occur.

5. Boomerang has certified its commitment to meet the service requirements applicable to the type of universal service support it receives.

Boomerang must certify that it will comply with the service requirements applicable to the support that it receives. 47 C.F.R. § 54.202(a)(1)(i). In the Petition, Boomerang committed to complying with applicable service requirements. Petition, Exh. C at 21. Boomerang has also shown an ability to provide Lifeline services as it is designated as a wireless ETC in 38 other states. IR 1-14. Therefore, the Department finds that Boomerang has met its burden under this requirement.

6. *Boomerang has certified its commitment and demonstrated its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.*

Boomerang states that it can remain functional in emergency situations, as required by 47 C.F.R. § 54.202(a)(2). Petition at 16. Boomerang will utilize T-Mobile's underlying wireless networks to provide service to its subscribers. *Id.* Boomerang states that T-Mobile has access to a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes from emergency situations. *Id.* at 17. By ensuring that its customers have the same network functionality in emergency situations as its underlying provider, which is able to remain functional in emergency situations, Boomerang has demonstrated its ability to remain functional in emergency situations.

7. *Boomerang has certified its commitment and demonstrated its ability to meet consumer protection and service quality standards.*

An ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 C.F.R. § 54.202(a)(3). Wireless applicants may satisfy this requirement by complying with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. *Id.* Boomerang commits to complying with the CTIA Consumer Code for Wireless Service. Petition at 17. Boomerang states its intention to provide high-quality customer service so that customer complaints can be resolved in a timely manner. *Id.* For example, Boomerang states customers can call customer service by dialing 611 from their Boomerang handset and no minutes will be used for the call, or consumers can call 1-888-543-3620 from any phone. *Id.* at 18. The Department holds that Boomerang has

demonstrated that it will meet the consumer protection and service quality standards for the type of support it receives.

8. *Boomerang has certified and demonstrated that it is financially and technically capable of providing the supported services.*

Boomerang has certified and demonstrated that it is financially and technically capable of providing Lifeline-supported services. *Id.*; see also 47 C.F.R. §§ 54.201(h), 54.202(a)(4). The relevant considerations for a showing of financial and technical capability include: “whether the applicant previously offered services to non-Lifeline consumers, how long it has been in business, whether the applicant intends to rely exclusively on [Universal Service Fund] disbursements to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.” *Lifeline Reform Order* ¶ 388.

Boomerang states that it is not exclusively dependent on Lifeline revenues and it has access to additional capital from its parent, affiliate companies and members. Petition at 18-19. Boomerang also states that it is owned by ViaOne, “which derives significant revenues from its diverse subsidiary operations, including non-Lifeline services.” *Id.* at 19. Boomerang also states that 100% of its subscribers receive Lifeline and that 97.5% of its revenue is derived from federal and state Lifeline benefits. RR 1-5; RR 1-6. Boomerang states it has provided Lifeline service for more than a decade and has gained considerable experience complying with Lifeline requirements and marketing to low-income consumers. *Id.* Furthermore, Boomerang states it does not have any ongoing litigation that will affect its ability to operate in Massachusetts. IR 1-22. Boomerang has not had an ETC designation revoked, rescinded, suspended, or otherwise terminated in any jurisdiction IR 1-23. Boomerang also has no outstanding tax liabilities. IR 1-24.

As a result of the foregoing, the Department finds that Boomerang has met its burden of showing that it is financially and technically capable of providing Lifeline service.

9. Boomerang has committed to complying with FCC and Department requirements.

a. Federal Lifeline Procedures and Requirements

Lifeline procedures and requirements established by the FCC include:

- 1) Screening applicants using the National Lifeline Accountability Database as set forth in 47 C.F.R. § 54.404(b)(1)-(12);
- 2) Complying with the carrier's obligations to offer Lifeline, including de-enrollment requirements, as established in 47 C.F.R. § 54.405(a)-(e);
- 3) Complying with minimum service standards and certain equipment requirements established in 47 C.F.R. § 54.408;
- 4) Certifying that the carrier is prepared to comply with the subscriber eligibility determination and certification requirements established in 47 C.F.R. § 54.410(a)-(h) to the extent applicable;
- 5) Complying with annual certification requirements established in 47 C.F.R. § 54.416(a), (b);
- 6) Complying with recordkeeping requirements established in 47 C.F.R. § 54.417;
- 7) Complying with audit requirements, to the extent applicable, established in 47 C.F.R. § 54.420; and
- 8) Complying with annual reporting requirements established in 47 C.F.R. § 54.422.

Boomerang has agreed to comply with all of the FCC's procedures and requirements. *See* Petition at 19. The Department finds that Boomerang has met the certification requirement.

b. Department Requirements

Boomerang has committed to meeting all Department ETC requirements that the DTC may lawfully impose. *See* Petition at 24; *13-4 Order* at App. The Department's new ETC requirements are effective 90 days from the issuance of the Department's 13-4 Order on

September 29, 2025.

10. Boomerang's designation as an ETC is consistent with the public interest, convenience, and necessity.

Prior to designating a common carrier as an ETC, the Department must make an affirmative finding that such designation is “consistent with the public interest, convenience, and necessity.” 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.202(b); *Universal Service Order*, ¶ 40; *T-Mobile Order* at 20-21. Boomerang bears the burden of proving that its designation as an ETC in the Service Area is in the public interest. *See Universal Service Order*, ¶ 44. For the reasons discussed below, the Department finds that granting Boomerang's ETC designation is in the public interest.

“In analyzing whether a petition for ETC designation is in the public interest, the Department considers multiple factors, including the benefits of increased consumer choice and the unique advantages and disadvantages of the carrier's service offering.” *T-Mobile Order* at 21 (quoting *Virgin Mobile Order* at 10); *see also Universal Service Order*, ¶¶ 40-44. This test must be applied in a manner consistent with the principles of preserving and advancing universal service and ensuring that quality services are available at just, reasonable, and affordable rates. 47 U.S.C. § 254(b)(1)-(2). Other factors that may be relevant in analyzing whether an ETC designation is in the public interest include: the availability of new choices for customers, affordability, quality of service, service to unserved or underserved customers, comparison of benefits relative to public cost, and considerations of material harm. *See Universal Service Order*, ¶ 40 n.111.

As each petitioner seeking ETC designation will likely be unique, the Department's exercise is necessarily fact-specific to each petition. *Universal Service Order*, ¶ 46. Accordingly, the Department evaluates the particular advantages or disadvantages of the services offered by

Boomerang, their affordability, and considerations of material harm in determining whether designating Boomerang as an ETC is in the public interest. *Id.*

The Department and the Commonwealth have long recognized the importance of broadband expansion and access. *See, e.g., In re a Nat'l Broadband Plan for Our Future*, GN Docket No. 09-51, *Joint Comments of the Mass. Broadband Inst. & MDTC* at 16, 20-21 (June 8, 2009). Today, the importance of access to broadband service, including mobile broadband, is even more critical for business, education, and civic life. Allowing an additional Lifeline-only ETC to offer mobile voice and broadband Lifeline services to qualifying consumers will confer a benefit upon Massachusetts residents. Indeed, Boomerang's Lifeline service can be an important step to bridging the digital divide for Massachusetts's low-income residents.

Boomerang's designation as a Lifeline-only ETC will increase competition in the Lifeline market, and the designation should increase eligible Lifeline subscriptions by increasing awareness of the Lifeline program generally. Since 2014, two wireless Lifeline-only ETCs have relinquished their ETC designation in the past 10 years. *See In re Budget PrePay, Inc. d/b/a Budget Mobile*, D.T.C. 17-3, *Order* (July 28, 2017); *In re T-Mobile Ne. LLC*, D.T.C. 14-5, *Order* (Dec. 18, 2014). Furthermore, the Department recently approved Telrite Corporation d/b/a Life Wireless ("Telrite") as a Lifeline-only ETC in Massachusetts and Boomerang provides another method for Massachusetts low-income consumers to access affordable voice, mobile and data service. This additional option should increase competition and provide increased options for consumers.

In addition, Boomerang's Lifeline service plan will likely be highly competitive. Boomerang states that it has various Lifeline plans including a free plan with 1000 minutes, 500 texts and 100 MB of data. Boomerang offerings have several features that will appeal to low-

income consumers. IR 1-27. Boomerang states its customers can access their account via its website to view their balance and purchase additional data or refills. *Id.* Boomerang also states that its customers service is staffed with live agents as opposed to automated systems. *Id.* Additionally, it offers broadband data at 4G or 5G – more than the minimum 3G that the FCC requires. *Id.* Boomerang states it does not impose credit checks, and provides an alternative for those low-income consumers unable to obtain credit as is required for post-paid services provided by traditional carriers. *See* Petition at 27.

Acting in the public interest dictates consumers receive complete and accurate information on these offerings before selecting a provider. As international calling options are a common additional feature, the Department orders that Boomerang explicitly disclose that international calling is not part of its traditional Lifeline offering. IR 2-1. To make international calls, a customer must use an external vendor or purchase an enTouch Wireless upgrade plan that includes international calling. *Id.* Boomerang must make these options clear in its terms and advertising to avoid customer confusion, to ensure that customers choosing Boomerang are aware of their limited international calling options.

The Department finds that Boomerang’ plan to introduce a unique, low-cost mobile voice and broadband option in the Service Area is consistent with the public interest. Accordingly, Boomerang has met its obligation to establish that its ETC designation is consistent with the public interest, convenience, and necessity.

D. Conclusion

The Department finds that Boomerang has satisfied federal ETC requirements, the Department’s ETC requirements, and that designation of Boomerang as a Lifeline-only ETC is consistent with the public interest, convenience, and necessity.

II. ORDER

Accordingly, after notice, hearing, and consideration, it is hereby

ORDERED: Consistent with the above, the Department hereby GRANTS Boomerang's Petition for Designation as a Lifeline-only Eligible Telecommunications Carrier in the Service Area.

By Order of the Department,

A handwritten signature in blue ink that reads "Karen Charles". The signature is written in a cursive, flowing style.

Karen Charles - Commissioner

RIGHT OF APPEAL

Pursuant to G.L. c. 25, § 5, and G.L. c. 166A, § 2, an appeal as to matters of law from any final decision, order or ruling of the Department may be taken to the Supreme Judicial Court for the County of Suffolk by an aggrieved party in interest by the filing of a written petition asking that the Order of the Department be modified or set aside in whole or in part. Such petition for appeal shall be filed with the Secretary of the Department within twenty (20) days after the date of service of the decision, order or ruling of the Department, or within such further time as the Department may allow upon request filed prior to the expiration of the twenty (20) days after the date of service of said decision, order or ruling. Within ten (10) days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court for the County of Suffolk by filing a copy thereof with the Clerk of said Court. Appeals of Department Orders on basic service tier cable rates, associated equipment, or whether a franchising authority has acted consistently with the federal Cable Act may be brought to the Federal Communications Commission pursuant to 47 C.F.R. § 76.944.