

Boomerang Wireless, LLC

Massachusetts Department of Telecommunications and Cable

Docket No. D.T.C 12-6

Respondent/Title: Lesli Marcee, Sr. Director of Regulatory &
Julia Redman-Carter, Regulatory and Compliance

REQUEST: Department of Telecommunications and Cable

DATED: November 4, 2024

DTC-Boomerang 1	Pursuant to Rule 47 C.F.R. § 54.202(a)(3), describe in narrative form Boomerang's ability to satisfy applicable consumer protection and service quality standards set forth in the Department's Rules & Practices Relating to Telephone Service to Residential Customers (D.P.U. 18448 (1997)).
REPLY:	<p>Regarding Rule 47 C.F.R. § 54.202(a)(3), Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang Wireless" or "Boomerang" or "Company") is proud to be a member in good standing of Cellular Telecommunications and Internet Association ("CTIA") and is both committed to and fully compliant with the CTIA's Consumer Code for Wireless Service.</p> <p>Regarding the Department's Rules & Practices Relating to Telephone Service to Residential Customers (D.P.U. 18448 (1997)), Boomerang Wireless offers Lifeline and data plans that are available to eligible customers consistent with Federal Communications Commission ("FCC") requirements. The eligibility requirements and available plans can be previewed on the Company's enTouch Wireless website (www.enTouchwireless.com). The application requirements are noted on the United Service Administrative Company ("USAC") paper applications and in the USAC enrollment portal process. The Company terms and conditions/terms of service ("Terms and Conditions") is available on the enTouch website at https://entouchwireless.com/terms-of-service/ and the English language version is reproduced in paper form as an Exhibit to Response No. DTC-Boomerang-12. Subscribers with questions or complaints can contact Customer Service by calling toll-free at 866-488-8719 or dialing 611 on their handset. Boomerang Wireless's consumer protection and service quality standards are consistent with industry standards and practices and meet the Department's longstanding policies in Docket 18448 (1997).</p>

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DTC-Boomerang 2	Describe how and when a Massachusetts Lifeline customer will be notified of any changes or updates to the applicable Terms and Conditions.
REPLY:	<p>Boomerang Terms and Conditions are on the website, www.enTouchwireless.com. The link to the Terms and Conditions is https://entouchwireless.com/terms-of-service/. A hard copy of the Terms and Conditions can be found in the Response to DTC-Boomerang-12 below.</p> <p>Subscribers are seldom notified of changes and updates to applicable Terms and Conditions. As noted in the Terms of Service, Boomerang Wireless reserves the right to modify the Terms and Conditions at any time, in Boomerang's sole discretion, and with limited notice requirements, with most modifications becoming binding on the user once posted on the enTouch Wireless website, which a subscriber should check regularly for updates. Boomerang shall comply with Massachusetts-specific requirements for changes or updates to terms and conditions, specifically, (1) notifying the Department of any material change(s) to the rates, terms, or conditions of the Boomerang's Lifeline service in Massachusetts at least 5 business days prior to the implementation of the changes(s); and (2) complying with July 1 annual report obligations as applied to Lifeline terms and conditions.</p>

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DTC-Boomerang 3	Provide the terms and conditions of all warranties and refund policies applicable to handsets provided or sold to Lifeline subscribers.
REPLY:	<p>Devices purchased directly from enTouch Wireless may be returned for a full refund within 30-days of purchase with the original receipt. Devices must be returned in their original package and with all original components. Refunds will not be issued for device returns that are missing components or damaged. enTouch Wireless also will issue a refund for defective devices, as determined by us in our sole discretion, if returned within 30-days.</p> <p>enTouch Wireless does not offer any Warranty Exchange Policy to subscribers that choose to use their own device. enTouch Wireless customers who have received or purchased a device from us, have up to thirty (30) days from the activation date, order date, or purchase date, of their phone to return any defective phone to enTouch Wireless. enTouch Wireless will exchange a defective phone for a new or refurbished phone, at the company’s discretion, during this period-of-time only. For a defective phone replacement, call Customer Care at 1-866-488-8719 or 611 from your enTouch Wireless phone.</p> <p>enTouch Wireless does not manufacture any devices or equipment subscribers may use with the services, including devices we may provide or sell to you. Boomerang is not liable for any defects, acts, or omissions of the manufacturers. The device’s manufacturer may provide subscribers with a warranty directly or that Boomerang may pass through a warranty from the manufacturer to you. If a device becomes defective after the standard 30-day return policy, the subscriber must contact the manufacturer for any warranty options.</p> <p>“Returns and Refunds” are addressed in section 4.2 of the Terms and Conditions.</p>

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DTC-Boomerang 4	Describe Boomerang's policy regarding customers returning equipment.
REPLY:	Devices purchased directly from enTouch Wireless may be returned for a full refund within 30-days of purchase with the original receipt. Devices must be returned in their original package and with all original components, including, but not limited to the: handset, box, charger, battery, battery cover, manuals, and accessories. All items must be undamaged and in like-new condition, including free from cracks, scratches, a liquid damage, or any other damage. For a defective phone replacement, customers may call Customer Care at 1-866-488-8719 or 611 from their enTouch Wireless phone to coordinate return and replacement.

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DTC-Boomerang 5	State whether Boomerang will impose an activation fee, change fee, early termination fee, or any other service fee for any of its Lifeline services. Provide a detailed description of any such fee(s) and explain whether the same or similar fee is imposed on non-Lifeline subscribers.
REPLY:	<p>Boomerang will not impose an activation fee, change fee, or early termination fee for its Lifeline services. The fees that may be applied to a customer are below:</p> <p>REPLACEMENT FEE: Beyond the first 30-day warranty, there may be a Replacement Fee of \$25.00 - \$99.00 for the exchange of a Company-provided FREE phone for another phone or other equipment if customer has received the FREE phone in the most recent 12 months.</p> <p>The Replacement fee will be waived for replacement of defective handsets (does not apply to breakage caused by customer negligence or water damage) returned complete with all accessories that came with the handset, in the original box with all materials and package inserts, within 30 days of receiving the handset.</p> <p>REACTIVATION FEE: A Reactivation Fee of \$25.00 may be applied to reactivate customer's phone. However, if the reactivation is for a Replacement phone, then the customer may be required to pay, at Boomerang's sole discretion, <u>either</u> the Reactivation Fee or Replacement Fee, but not both, for the same event.</p>

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DTC-Boomerang 6	State whether Boomerang's Lifeline subscribers incur roaming charges. If so:	
	a.	State whether Lifeline subscribers will be notified before they incur roaming charges, and whether they can terminate the call before incurring such roaming charges;
	b.	Describe in narrative form how roaming charges will apply to Boomerang's Massachusetts Lifeline subscribers; and
	c.	State whether additional charges will be incurred for 911 calls made while roaming.
	d.	Provide a list of countries that Lifeline subscribers can make calls to and the rate per minute for each of these countries.
REPLY:	Roaming is not available for Lifeline subscribers. Thus, the responses for 6a, 6b, 6c, and 6d are Not Applicable.	

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DTC-Boomerang 7	State whether Boomerang's Lifeline subscribers in Massachusetts will receive free access to any web-based account management tools.
REPLY:	Boomerang Lifeline subscribers have the option to create a free online account by visiting https://portal.entouchwireless.com where they can manage their account. Subscribers may check their service balance, make payments (if opting into a paid plan), and purchase refills.

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DTC-Boomerang 8	Identify each media platform Boomerang intends to use in Massachusetts and provide examples of advertising for each platform.
REPLY:	The Company has not yet determined the media platform(s) in Massachusetts that Boomerang Wireless will use in connection with a service rollout in the Commonwealth, nor the specific advertisements it will use for such platforms(s).

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DTC-Boomerang 9	Identify whether Boomerang has engaged in market research for Massachusetts, including but not limited to any underserved groups or areas Boomerang has identified and intends to target in Massachusetts.
REPLY:	Boomerang has not engaged in market research for Massachusetts. Nevertheless, as of August-2024, it appears based on proprietary business information available to Boomerang that Massachusetts' Lifeline eligible subscribers total approximately 850,000 while both wireless and wireline Lifeline Service Providers are only serving approximately 100,000 subscribers. This represents an estimated participation rate of about 12%. In light of the relatively low penetration figures, Boomerang believes there are ample underserved customers – approximately 88% of the estimated Lifeline eligible subscribers – who could benefit from Boomerang's Lifeline offerings. Boomerang wants the opportunity to provide Lifeline services to these many underserved residents of Massachusetts.

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DTC-Boomerang 10	Explain how Boomerang’s marketing strategy reaches underserved groups in Massachusetts.
REPLY:	See responses to Requests 8 and 9 above.

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DTC-Boomerang 11	Describe Boomerang's plans for providing quality customer service in Massachusetts, including but not limited to:	
	a.	the number of employees in Boomerang's intended customer service operation.
	b.	The physical location of Boomerang's customer service staff.
	c.	Boomerang's internal standards for responding to and resolving customer inquiries and complaints (e.g., expected response times, manner of communication).
REPLY:	<p>a. There are currently a total of 27 customer service representatives.</p> <p>b. The customer service staff is located in the Dallas office at: 2711 Lyndon B Johnson Fwy, Suite 1065, Dallas TX 75234</p> <p>c. Boomerang's goal is to resolve customer complaints, most of which come by phone, within 1 – 5 business days. For escalated complaints from a state, Better Business Bureau, Federal Communications Commission and similar agencies and entities, Boomerang works within the timeframes established by the entity.</p> <p>For the month of September 2024, the average speed of answer for all the enTouch queues (which includes customer service, complaints, repair, etc.) was 19 seconds; and the average handling time for a call was 6 minutes and 51 seconds.</p>	

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DTC-Boomerang 12	Provide a copy of the proposed Terms of Service for Boomerang's Lifeline subscribers in Massachusetts.
REPLY:	Boomerang's Terms of Service are available online at www.enTouchwireless.com/terms-of-service. A hard copy version of the English language version of the Terms of Service is attached as Exhibit DTC-Boomerang – 12 hereto.

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DTC-Boomerang 13	Provide the number of consumer complaints received by Boomerang in each of the last three years from Lifeline subscribers for the following categories, 1) billing, 2) finance, 3) network coverage, 4), operational, 5) product, and 6) trouble.																																			
REPLY:	<p>See the chart below for the complaints received by Boomerang Wireless by the requested categories in the last three years.</p> <table><tr><th>Year</th><th>Billing</th><th>Finance</th><th>Network Coverage</th><th>Operational</th><th>Product</th><th>Trouble</th></tr><tr><td>2022</td><td>4</td><td>0</td><td>34</td><td>8</td><td>19</td><td>0</td></tr><tr><td>2023</td><td>0</td><td>0</td><td>32</td><td>0</td><td>19</td><td>0</td></tr><tr><td>2024</td><td>5</td><td>0</td><td>8</td><td>0</td><td>5</td><td>0</td></tr><tr><td>Total</td><td>9</td><td>0</td><td>74</td><td>8</td><td>43</td><td>0</td></tr></table> <p>Regarding the Network Coverage complaint category, please note that in 2022 through early 2023, Sprint, T-Mobile and Verizon (all underlying carriers of Boomerang) updated to their system/towers/networks eliminating across the country: Sprint’s ‘3G’ services and devices that relied on 3G or less data services; T-Mobile’s ‘3G Retirement; and Verizon’s CDMA devices decommission. This resulted in higher complaint calls not attributable to or within the control of Boomerang.</p> <p>Regarding the Product Complaint category: Beginning in 2022 through 2023, USAC changed and implemented rules and processes for the Affordable Connectivity Program (“ACP”) program in addition to handling enrollments and transfers of ACP services of and between service providers. The various plans, cable and telecom networks, and the Lifeline framework resulted in product confusion during transfers and service provider movement for subscribers and higher complaint calls not attributable to or within the control of Boomerang.</p>	Year	Billing	Finance	Network Coverage	Operational	Product	Trouble	2022	4	0	34	8	19	0	2023	0	0	32	0	19	0	2024	5	0	8	0	5	0	Total	9	0	74	8	43	0
Year	Billing	Finance	Network Coverage	Operational	Product	Trouble																														
2022	4	0	34	8	19	0																														
2023	0	0	32	0	19	0																														
2024	5	0	8	0	5	0																														
Total	9	0	74	8	43	0																														

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DTC-Boomerang 14	Provide a current list of all states where Boomerang or any of its affiliates has been designated as an ETC. For each state, indicate whether the designation is limited, and if so how, including any specific requirements imposed on or volunteered by Boomerang or its affiliates. Provide complete and detailed documentation of any such designation, limitation(s), and/or requirement(s).
REPLY:	Boomerang has an ETC designation in the following 38 states:
a	Alabama
b	Arkansas
c	Arizona, includes Tribal lands
d	California, includes Tribal lands
e	Colorado
f	Florida, includes Tribal lands
g	Georgia
h	Hawai'i, includes Tribal lands
i	Iowa, includes Tribal lands
j	Idaho, includes Tribal lands
k	Indiana
l	Kansas, includes Tribal lands
m	Kentucky
n	Louisiana, Non-rural areas only
o	Maryland, Non-rural areas only
p	Michigan, includes Tribal lands
q	Minnesota, includes Tribal lands
r	Missouri
s	Mississippi, includes Tribal lands
t	North Dakota, includes Tribal lands
u	Nebraska, includes Tribal lands
v	Nevada, includes Tribal lands
w	New York, incudes Tribal lands

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x y z aa bb cc dd ee ff gg hh ii jj kk ll	Ohio Oklahoma, includes Tribal lands Pennsylvania Puerto Rico Rhode Island South Carolina, Non-rural areas only South Dakota, Non-rural areas only Tennessee Texas Utah Virginia Washington, includes Tribal lands West Virginia, Non-rural areas only Wisconsin, includes Tribal lands Wyoming, includes Tribal lands
	Please see Exhibits DTC-Boomerang 14a through 14ll for documents related to the ETC designation in each of the jurisdictions noted above. The original ETC designations are being included and, if not clear in the designation, additional application materials are included. The details above may reflect additional updates to coverage areas.

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DTC-Boomerang 15	Provide a current list of all states where Boomerang or any of its affiliates has a petition currently pending for ETC designation and describe the status of each petition. If any petition has been denied, provide a copy of the denial issued by the commission or government agency.
REPLY:	Massachusetts is the only current state for which Boomerang has a current pending petition to secure an ETC designation.

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DTC-Boomerang 16	State whether the FCC, any state utilities commission, or any other government agency has, to date, rendered or entered a finding, criminal conviction (including plea agreements), or civil judgement (including money judgements) against Boomerang, its executives, or managers, during the last ten years. Provide a copy of any such finding, conviction, plea agreement, or civil judgement entered against Boomerang, its executives, or managers.
REPLY:	The FCC, state utilities commissions, or other government agencies have not brought a criminal conviction or civil judgment against Boomerang, its executives or directors during the last ten years.

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DTC-Boomerang 17	Provide a complete and detailed list of each of Boomerang's affiliates and provide the names under which each does business.
REPLY:	<p>The list below identifies Boomerang's Parent company, Viaone Acquisition, and, additionally, Viaone Services, Boomerang Wireless's Mobile Virtual Network Enabler ("MVNE") and its resource for marketing efforts, operations and finance. Boomerang Wireless also utilizes resources from PayGo Distributors for in-person distribution events.</p> <p>Viaone Acquisitions - Parent Company Viaone Services* - Affiliate, and MVNE Assist Wireless - Affiliate, and ETC (no operations in Massachusetts) PayGo Distributors* - Affiliate CTC Outreach Marketing - Affiliate V1 Fiber - Affiliate Guard Assure - Affiliate</p> <p>*indicates Boomerang utilizes services from these affiliates.</p>

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DTC-Boomerang 18	Describe Boomerang’s specific role with respect to its partnerships with ViaOne, Cali Distribution, LLC, PayGo Distributors, and any other relevant affiliates.
REPLY:	<p>Boomerang Wireless is a Mobile Virtual Network Operator (“MVNO”) that changed its MVNE from Ready Wireless to Viaone Services. An MVNE provides network infrastructure and related services, such as billing, operations, customer service, backend network provisioning and, manage accounts and top-up data for an MVNO.</p> <p>As Boomerang’s MVNE, Viaone Services provides and accesses marketing materials and tools. For example, it maintains and updates Boomerang’s website; provides posters and other marketing materials for sales events; and coordinates the placing of ads in papers or other media, among other services. This is in addition to the provision of network infrastructure and related services, such as billing, operations, customer service, backend network provisioning and management of accounts and top-up data.</p> <p>Cali Distribution, LLC was an organization that focused distribution of ACP and/or Lifeline services exclusively in California due to state specific requirements.</p> <p>PayGo Distributors provides access to distribution and sales force for the Lifeline services.</p>

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DTC-Boomerang 19	State whether Boomerang’s merger with ViaOne has impacted service quality. Provide any relevant consumer or technical metrics in the answer.
REPLY:	<p>Boomerang Wireless’s Customer Services did experience some short term/temporary issues over the approximate two-year transition period of the Viaone Services’ purchase from May 2021 to April 2023.</p> <p>For example, redirecting portion(s) of the customer service traffic between Ready Wireless’ MVNE system and Viaone Services’s MVNE required adjustments for staffing customer service personnel to accommodate the revised flow, resulting in longer answer times in one or more Boomerang offices. A second example was a short term ‘system/programming error’ that caused some of the customer calls to get caught in a loop and the call did not ring into the queue. When issues occurred, as in both of these examples, the issues were identified and addressed.</p>

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DTC-Boomerang 20	Provide the following for each of the last five years:	
	a.	Profit and loss statements;
	b.	Balance sheets; and
	c.	Statement of cashflows.
REPLY:	See Confidential Exhibits DTC-Boomerang 20A through 20E, respectively, for available financial statements as required in a, b, and c for each of the last five years. A Motion for Confidential Treatment is separately submitted herewith. Relative to cash flow statements, Boomerang's former parent, HH Ventures, did not make available to Boomerang cash flow information for two of the earlier years requested so they are not included within the Confidential Exhibits.	

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DTC-Boomerang 21	If Boomerang has previously provided service in Massachusetts, state all services that Boomerang has offered since Boomerang began operating in Massachusetts including those services currently being offered. Also, describe the scope of such service, including geographic areas of operation, types of customers served, and total number of Massachusetts customers.
REPLY:	<p>Boomerang Wireless has not received an ETC designation in Massachusetts and has not provided ETC services in Massachusetts.</p> <p>AirFair cards that could be used for purchase of non-ETC services were available at about 100,000 stores, such as CVS, 7-Eleven, and Dollar General, throughout the 48 contiguous states, including Massachusetts during the years of 2014 – 2022 approximately.</p> <p>The AirFair card, a product of Boomerang Wireless’s then-parent, HH Ventures, allowed Boomerang Wireless and other wireless service providers to offer a convenient means for subscribers to purchase additional minutes, units, and data to their accounts, whether at home or on the go. The card packaging displayed logos of the participating companies (including the enTouch Wireless logo) from which the subscriber would purchase minutes, units or data services, whether for available Lifeline or non-Lifeline services. A customer could purchase a package for \$5.00, \$10.00, \$20.00, \$50.00 from the retail store, and then, using their device, upload those services into their account with Boomerang or one of the other companies’ logos reflected on the package. The AirFair cards ceased distribution in 2022. However, any cards presented to Boomerang following ETC licensure will be honored by Boomerang.</p>

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	<p>Additionally, pursuant to FCC authorization, Boomerang provided Lifeline Broadband Provider program (“LBP”) services in Massachusetts for about 5 months from December 28, 2016 through May 31, 2017.</p> <p>On December 1, 2016, the Wireline Competition Bureau (“WCB”) designated Boomerang Wireless LLC as n LBP eligible to provide Lifeline Broadband Internet Access Service [(“BIAS”)] support” within our designated service area. Boomerang’s broadband offering provided “500 MB of mobile BIAS at 3G speeds and 100 units for voice and text services to Lifeline subscribers on non-Tribal lands, and 750 MB of mobile BIAS with unlimited voice and text, to Lifeline subscribers on Tribal lands, at no cost to the consumer after applying the Lifeline discount.” (FCC Order, DA 16-1325, Rel. Dec 1, 2016, pg 3).</p> <p>At the time of the LBP designation, Boomerang Wireless was in the process of transferring former Lifeline subscribers from Budget (served by the underlying carrier, Verizon) and Total Call to Boomerang. Per FCC approval and in coordination with USAC, both companies were exiting from the Lifeline program services. Boomerang had an active petition for ETC designation in Massachusetts (filed 8/31/2012 in the instant proceeding, D.T.C. 12-6). However, because Massachusetts was one of four (4) states at that time where Boomerang was not a designated ETC provider, Boomerang was only able to transfer the applicable Budget subscribers under its LBP designation. Approximately 2803 Massachusetts subscribers were transferred from Budget and/or Total Call to the Boomerang LBP program on December 28, 2016.</p>
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	<p>On February 3, 2017, the WCB reconsidered the orders designating the nine (9) companies, including Boomerang, as LBPs. “The Bureau sets aside those orders, revokes the LBP designations for those providers, returns those petitions for LBP designation to their status as petitions pending before the Bureau,” (FCC Order, DA 17-128, Rel. date February 3, 2017, pg. 1).</p> <p>On page 6, section B., paragraph 15 of the reconsideration order, the WCB laid out a process for the “Transition of Subscribers Currently Being Served by Boomerang Wireless.” First, “to prevent service disruption and hardship for the subscribers currently receiving a Lifeline-supported BIAS offering from Boomerang pursuant to Boomerang’s LBP designation, we delay the revocation of Boomerang’s LBP designation and return of its petition to its prior status as a petition pending before the Bureau until 60 days after the effective date of the order. We direct Boomerang to notify, in writing, within 30 days of the effective date of this order any of its customers who will be unable to receive a Lifeline discount on their broadband Internet access service as a result of this Order. This notice must inform customers that they will not receive the Lifeline discount on their current Lifeline -supported BIAS beginning 60 days after the effective date of this Order, but that they have the option of transferring their Lifeline benefits to another Lifeline provider. Boomerang must also de-enroll those subscribers within 60 days of the effective date of this order....”</p>
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Boomerang Wireless, LLC

Massachusetts Department of Telecommunications and Cable

Docket No. D.T.C 12-6

Respondent/Title: Lesli Marcee, Sr. Director of Regulatory &
Julia Redman-Carter, Regulatory and Compliance
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	<p>In FCC order DA 17-291 issued on March 29, 2017, Boomerang’s LBP designation and return of its petition to pending status was extended another 60-days until June 5, 2017. Following Boomerang’s multiple letters and text notices to applicable subscribers, any LBP subscribers failing to transfer their services to an ETC provider within those five (5) states were de-enrolled from the Lifeline program in NLAD and their services were disconnected on Wednesday, May 31, 2017.</p> <p>In connection with the above LBP transactions in Massachusetts pursuant to FCC authorization, Boomerang requested relief from the Department in the form of an emergency or interim designation as a Massachusetts ETC but the requests were not acted upon. See Boomerang filings in the instant Docket No. 12-6 dated February 17, 2017, and March 31, 2017.</p>
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DTC-Boomerang 22	Identify any and all ongoing litigation that affects or may affect the services offered or intended to be offered by Boomerang in Massachusetts. Provide a copy of all judicial filings made in relation to such litigation.
REPLY:	Boomerang does not have any ongoing litigation that will affect or may affect the services offered or intended to be offered in Massachusetts.

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DTC-Boomerang 23	State whether Boomerang has engaged in the following (provide all supporting documentation and explain the reason(s) behind each event or occurrence falling under these categories):	
	a.	Formally relinquished, or unilaterally abandoned, or withdrawn an ETC designation in any state or other jurisdiction;
	b.	Experienced dismissal (with or without prejudice) of an application or petition for ETC designation; and
	c.	Had an ETC designation permanently revoked, rescinded, suspended, or otherwise “terminated” in any state or jurisdiction.
REPLY:	<p>a. Boomerang relinquished its ETC designation in the state of Oregon on October 15, 2022, for business-related reasons. A copy of the relinquishment documentations is attached as Exhibit DTC-Boomerang 23a herewith.</p> <p>b. Boomerang withdrew (dismissed without prejudice) its ETC applications in the states of Illinois and New Mexico for business-related reasons. A copy of the relinquishment documentation is attached as Exhibit DTC-Boomerang 23b.1 (Illinois) and 23b2 (New Mexico) hereto, respectively.</p> <p>c. Boomerang has not had an ETC designation revoked, rescinded, suspended, or otherwise “terminated” in any state or jurisdiction.</p>	

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DTC-Boomerang 24	State whether Boomerang is subject to any outstanding tax liabilities, late payments, or other liabilities due and owing to the Commonwealth of Massachusetts or any government and/or quasi-public entities in any other jurisdictions. If so, provide complete and detailed documentation identifying the amounts owed and explaining the reasons for such arrears.
REPLY:	Boomerang is not subject to any outstanding tax liabilities.

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DTC-Boomerang 25	State how long it would take Boomerang to offer Lifeline service in Massachusetts from the date of approval, if the Petition is granted by the Department.
REPLY:	Assuming relatively prompt approval, Boomerang expects to offer Lifeline services in Massachusetts not earlier than some time in the second half of 2025 or first half of 2026, subject to the timing of the approval, business conditions and budgeting constraints.

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DTC-Boomerang 26	Provide a sample certification and annual verification (or re-certification) forms to be used by Boomerang in Massachusetts that satisfy 47 C.F.R. § 54.410(d), (f).
REPLY:	<p>Boomerang Wireless no longer handles certification or annual recertification in any states per the <i>Third Report and Order, Further Report and Order, and Order on Reconsideration, (rel April 27, 2016) FCC 16-38</i> (“Modernizing Lifeline for Digital Era Order” or “Order”). The Order established the National Eligibility Verifier (referred to as National Verifier) as the neutral third-party entity to determine eligibility and enroll eligible subscribers into the Lifeline program. Additionally, Service Providers no longer handle Annual Recertification for any Lifeline subscribers. The ‘opt-out states’ of CA, TX and OR have a ‘Third Party Administrator’ (“TPA”) for their Lifeline program which handles certification and recertification. In states other than those limited opt-out states, when an applicant applies for the Lifeline Benefit, whether via a service provider’s online application process which links to the applicant to the National Verifier portal, or via the National Verifier portal directly, the National Verifier – not the Service Provider – has sole responsibility for reviewing, determining, and enrolling the applicant into the Lifeline program.</p> <p>Boomerang does offer its own online application that links to the National Verifier portal to verify the subscriber’s eligibility or apply to eligibility for the Lifeline program. Boomerang’s website, www.enTouchwireless.com, does provide a means for an applicant to download a paper copy of the National Verifier application for the applicant to submit directly to USAC, via mail, for review and enrollment. All completed paper applications and documentation</p>

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	are submitted directly to USAC for review and approval without any receipt or review by Boomerang. Any Lifeline applicant mail received by Boomerang is redirected to USAC unopened.USACs Lifeline applications and service portals specifically address the requirements of 47 C.F.R. § § 54.410(d), (f).
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DTC-Boomerang 27	Explain how granting Boomerang’s Petition will result in unique service offerings relative to other ETCs currently providing Lifeline services in Massachusetts.
REPLY:	Boomerang offers services and options that differ from those offered by some or many of the existing Massachusetts ETC providers. Among other things, Boomerang customers can access their account via the website to view balances and purchase additional data or refills; Boomerang’s Customer Service is staffed with live agents rather than relying on automated systems; and though the FCC requires 3G minimums, Boomerang offers broadband data at 4G or 5G, based on the limitations of the network and/or device. Additionally, Boomerang has extensive and potentially unique experience and expertise in working with tribes to offer Lifeline services, as we have provided Lifeline services to more than 55 tribes since 2013.

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DTC-Boomerang 28	State whether Boomerang has any policies or terms and conditions that restrict or throttle a subscriber's data speed. If so, describe these policies in detail.
REPLY:	<p>The enTouch Wireless Transparency Disclosure, located at https://entouchwireless.com/internet-transparency/, provides network management practices, commercial terms applicable to our mass market wireless broadband internet access services consistent with the FCC's Transparency Rule and applicable state laws and regulations.</p> <p>Specific service plans identify the applicable details on data and speed thresholds. Note: that if a subscriber uses the Broadband Services in a manner that violates Boomerang's Terms and Conditions, including our Acceptable Use Policy, available at www.entouchwireless.com/privacy-policy/, Boomerang may suspend, terminate, or restrict a subscriber's data session, switch the subscriber to a more appropriate data plan, or terminate the subscriber's service.</p> <p>enTouch Wireless does not directly or indirectly favor some traffic over other traffic (such as through prioritization, resource reservation, or traffic shaping) in its provision of the Broadband Services for any type of consideration from a third party or to benefit an affiliate. During natural disasters and other emergencies, our Underlying Carrier may prioritize emergency communications, including those of law enforcement, public safety officials, or national security authorities, consistent with or as permitted by applicable law.</p>

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	<p>Regarding speed, the maximum download speeds achievable on the network of our Underlying Carrier are typically between 70 – 320 Mbps for 5G devices and 9 – 48 Mbps for 4G LTE devices. The maximum upload speed is typically between 7 – 32 Mbps for 5G and 3 – 18 Mbps for 4G LTE devices. enTouch Wireless provides its Services at speeds of at least 128 kbps download and upload, where the network will support such performance. After subscriber(s) uses the monthly high-speed data allotment included in their service plan, subscriber’s data speed may be reduced or subscriber’s data access may be suspended for the remainder of the billing cycle; subscribers should check their service plan for details. Customers can receive additional data by upgrading their service plan to one with a higher data allotment or by purchasing a data top-up.</p> <p>Descriptions of the rates and fees applicable to our Broadband Services are described in our service plan offers and in our general Terms and Conditions, available on our website, www.entouchwireless.com/terms-of-service/, and reproduced in written form in Response No. DTC-Boomerang 12 above.</p>
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DTC-Boomerang 29	Elaborate on how Boomerang plans to serve customers on federally recognized tribal lands in Massachusetts and estimate the number of eligible customers Boomerang will attempt to serve.
REPLY:	<p>Please note, any individual, tribal or non-tribal, who qualifies for the Lifeline benefit may apply on-line with the National Verifier for enrollment in the Federal Lifeline program. Provided the applicant resides within Boomerang's coverage area and resides on qualifying tribal lands (per USAC maps), the applicant can enroll with enTouch Wireless and usually receive the applicable tribal plan.</p> <p>Often, particularly when a tribe's location is isolated, Boomerang may reach out to those tribes directly seeking a relationship with the tribe to provide Lifeline services and marketing directly to the tribe's residents. In these cases, Boomerang determines if there are any qualifying applicants residing on tribal lands within our approved coverage area. If so, Boomerang then approaches the Tribal government seeking permission to work with, distribute and provide Lifeline to qualifying applicants on their tribal lands. If granted, then Boomerang will work with the tribe to lay out a plan and approach to help educate and provide a means assist making the Lifeline program available for the applicants to enroll.</p>