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March 12, 2013

VIA E-FILEING AND HAND DELIVERY

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

Re: D.T.C. 12-6 – Petition of Boomerang Wireless, LLC for Limited Designation
as a Lifeline-Only Eligible Telecommunications Carrier

Dear Ms. Williams:

Enclosed for filing in the above-referenced matter please find an original and three (3) copies of (1) Public Record Responses of Boomerang Wireless, LLC, (2) Motion for Confidential Treatment and (3) Certificate of Service. The confidential responses will be separately filed with Hearing Officer Sean Carroll.

Please contact the undersigned if you have any questions.

Very truly yours,



Robert J. Munnely, Jr.

Enclosures
cc: Service List

4382971

In Re:

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

D.T.C. Case No. 12-6

Record Request 1: Confirm accuracy of MA ads and charts in record or update MA materials as needed and submit as attachments. (Tr. 20) Marketing materials should include enTouch brand where appropriate. (Tr. 37) Note also need to fix eligibility form and provide new one as an attachment that stops at 8 people rather than the current six. (Tr. 37-38)

RESPONSE: The charts (the 11 plan and 3 plan charts) in the marketing materials submitted in response to DTC information request 1-7a are accurate. The 11-plan chart is applicable to phones associated with the Sprint network and the 3 plan chart is for phones associated with the Verizon network. An additional chart with 5 additional top-up plans has recently become available. See response to RR2 for more information about the charts and associated underlying carriers.

The attached advertising materials have been revised/updated with the following information: enTouch branding, Massachusetts Consumer Contact information has been added where applicable (11 x 17 Poster, Flyer, Eligibility Requirements Poster,), a Questions Poster (posting at events) has been added to the materials, and the bag insert has been updated and revised with the Airfair top up plans. Please note, per the response to RR9 below, the Department's consumer services number has been added to the updated marketing materials.

The Lifeline Application has been modified to include the '7' and '8' family members for the Federal Poverty Guideline amounts. Also, the 135% figures have been adjusted to reflect the 2013 FPG figures.

Please note that the following materials are attached to these record responses:

Attachment RR1-A, Revised Massachusetts Advertising Materials
Attachment RR1-B, Revised Massachusetts Lifeline Application

Person Responsible for Answer: James T. Balvanz

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Record Request 2: Explain why some charts re top up plans in Exhibit B have 11 plan elements and some have only 3. (Tr. 25-26)

RESPONSE: The chart with the 11 plan elements are the options currently available by Ready Wireless under the ReadyMobilePCS (brand name) for the phones distributed that use the Sprint (underlying carrier's) network. (See bag insert in Attachment RR1-A to view chart.) The bag insert with the 11 top-up options is included with each of the Sprint phones.

Denominations	Days of Use	Minutes	Peak Minutes	N/W Minutes	Texts	Data	Units (Mins+Text)
\$5.00	10	N/A	N/A	N/A	N/A	N/A	50
\$10.00	3	N/A	Unlimited	Unlimited	Unlimited	N/A	N/A
\$10.00	7	N/A	30	Unlimited	.10/text	N/A	N/A
\$15.00	7	N/A	Unlimited	Unlimited	Unlimited	N/A	N/A
\$15.00	10	N/A	60	Unlimited	.10/text	N/A	N/A
\$30.00	14	N/A	Unlimited	Unlimited	Unlimited	N/A	N/A
\$30.00	30	N/A	140	Unlimited	.10/text	N/A	N/A
\$50.00	30	N/A	Unlimited	Unlimited	Unlimited	N/A	N/A
\$7.00	7	100	N/A	N/A	200	5 MB	N/A
\$20.00	30	500	N/A	N/A	1,000	20 MB	N/A
\$30.00	30	1,000	N/A	N/A	1,200	30 MB	N/A

The chart with only the 3 plan elements available, which match the bottom three (3) plans on the above chart, are the options currently available by Ready Wireless under the ReadyMobilePCS (brand name) for the phones distributed that use the Verizon (underlying carrier's) network. The bag insert with the 3 top-up options is included with each of the Verizon phones distributed.

Denominations	Days of Use	Minutes	Peak Minutes	N/W Minutes	Texts	Data	Units (Mins+Text)
\$7.00	7	100	N/A	N/A	200	5 MB	N/A
\$20.00	30	500	N/A	N/A	1,000	20 MB	N/A
\$30.00	30	1,000	N/A	N/A	1,200	30 MB	N/A

Whether Sprint or Verizon phones are distributed depends on the network(s) providing coverage, and the availability of phones.

Please note there is another chart with five (5) additional top-up plans which focus on the data element. This additional chart reflects the Airfair top-up plan offerings, which will work for both the Sprint and Verizon phones. This chart is for a universal top up card provided through Airfair Wireless LLC. The Airfair top up cards will carry the brands of multiple companies, including the enTouch brand, in stores across the nation. The Airfair chart will appear on bag inserts for both the Sprint and Verizon phones. (See bag insert in Attachment RR1-A to view chart.)

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Record Request 3: Explain firm policies regarding how to handle complaints:

- A- that a phone has insufficient signal strength. (Tr. 32)
- B- that the wrong top up cards were purchased. (Tr. 32-33)

RESPONSE:

A. Signal Strength. The customer service representative verifies that the phone is associated with the appropriate underlying carrier for the service area. If Boomerang has an agreement with another underlying carrier for the customer's service area, then the customer service representative will issue a phone for the alternate underlying carrier. If that phone has poor signal or there is not an alternate underlying carrier, then Boomerang customer service will have to cancel the whole service and deactivate the phone.

B. Wrong Cards. When the Boomerang customer contacts customer service informing them that they have purchased and "loaded" the top up plan that doesn't work on their phone, the customer service representative will:

- a) direct customer to the bag insert provided that identifies the top up plans and associated brand names available to the customer for their Lifeline phone; and
- b) educate them on how to identify the correct top up cards in the future; and
- c) attempt to load a corresponding top-up plan / minutes, depending on the price and plan they purchased (if able to verify purchase and activation of top up card); and/or
- d) issue additional air time directly to their device.

Boomerang does not redirect the customer back to the retail store because typically sales of Top Up cards are final and non-refundable due to the nature of the top up cards (similar to gift cards or prepaid credit cards). Once the top up card is initially activated by the Merchant when sold, anyone can load the minutes onto their phone and there is no way to retrieve those minutes or reload the top up card.

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Record Request 4: Is the Company willing to comply with MA mass migration disclosure guidelines established in Docket DTE 02-28? (Tr. 49-51)

RESPONSE: No. Boomerang is not a CLEC and the guidelines are not applicable. Furthermore, they also do not make sense relative to prepaid wireless service. In contrast to CLEC landline phone provider customers, Boomerang customers can easily transition to another Lifeline or conventional provider in the event Boomerang ceased service in Massachusetts. In fact, there are no contracts between the customer and the ETC and, moreover, there is no notice required from the customer to the ETC when a customer elects to switch to an alternate carrier. The customer merely stops using his or her phone and ceases purchasing any top up minutes. Nonetheless, Boomerang anticipates providing some form of advanced notice to customers in the unlikely event it is forced to exit the Massachusetts market or cease operations. Boomerang will of course comply with any migration requirements that are made applicable to all comparable ETCs in a generic proceeding.

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Record Request 5: Chart of your wholesale clients - name, states operated, lifeline, non-lifeline and associated number of lines. (Tr. 55-57, 102-04)

RESPONSE: Please see Confidential Response RR5-Conf. (Chart of Wholesale Customers), filed separately herewith. A Motion for Confidential Treatment also is submitted herewith.

Person Responsible for Answer: James T. Balvanz

In Re:
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D.T.C. Case No. 12-6

Record Request 6: What is the percentage of current Boomerang Lifeline-based versus non-Lifeline-based revenues? (Tr. 57-58)

RESPONSE: Please see Confidential Response RR6-Conf. (Chart of Lifeline versus non-Lifeline revenues), filed separately herewith. A Motion for Confidential Treatment also is submitted herewith.

Person Responsible for Answer: James T. Balvanz

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D.T.C. Case No. 12-6

Record Request 7: Review commitments in T-Mobile Order (D.T.C. Docket No. 12-4) and confirm which ones Boomerang will accept. (Tr. 65-68)

RESPONSE: Below is a listing of the Department requirements identified in the T-Mobile Order, and Boomerang's responses to each is following in the bullets:

- a) *"Provide quarterly reporting to the Department of customer accounts terminated for inactivity;"*
 - Boomerang will commit to provide a quarterly report of the Lifeline customers that are de-enrolled from the Lifeline program for inactivity per the 60-day non-usage rule.
- b) *"Provide reporting of consumer complaints to the Department regarding its Lifeline service and agree to participate in dispute resolution by the Department's Consumer Division;"*
 - Boomerang agrees to provide reporting of consumer complaints to the Department regarding its Lifeline service. See Response to RR8 below.
 - Boomerang agrees to participate in dispute resolution by the Department's Consumer Division which, Boomerang assumes, involves responding in good faith to customer-related inquiries from Department consumer staff. Boomerang does not agree to be subject to the dispute resolution processes in the Department's Billing and Termination rules applicable to CLECs.
- c) *"Provide reporting to the Department of USF support received for Massachusetts consumers;"*
 - Boomerang will commit to provide reporting to the Department of USF support received for Massachusetts consumers.
- d) *"File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline service customers and agree to an ongoing obligation to notify the Department of any future changes to its rates, terms or conditions 30 days prior to implementing such changes;"*
 - Boomerang agrees to file its terms and conditions of service that are applicable to Lifeline Customers within 60 days of the approval of its Petition.
 - Boomerang agrees to notify the Department of program changes which clearly benefit consumers to its Lifeline rates, terms or conditions no later than 30-days after implementing such changes, consistent with the response to RR-10, following.
 - Boomerang agrees to notify the Department of material program changes that may not clearly benefit consumers to its Lifeline rates, terms or conditions 30 days prior to implementing such changes, consistent with the response to RR-11, following.
- e) *"Include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service;" and*
 - Boomerang agrees to include the Department's contact information for consumer complaints in marketing materials as identified in Attachment RR-1A with language similar to that indicated in the sample advertising in Attachment RR-1A.
- f) *"Provide Public Safety Answering Points ("PSAP") self-certification to the Department."*
 - Boomerang agrees to provide PSAP self-certifications received from its underlying carriers to the Department.

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Record Request 8: Does Boomerang agree to provide quarterly reports to the DTC re number of complaints and associated categories? (Tr. 65-68)

RESPONSE: Echoing our commitment in RR7-b above, Boomerang agrees to provide reporting of consumer complaints to the Department regarding its Lifeline service. As to the frequency of the reports and the associated categories, Boomerang agrees to quarterly reporting, provided that such frequency is a requirement imposed on all other ETCs. Otherwise, Boomerang agrees to provide such reporting on not less than an annual basis until such time as the Department establishes a different period for all comparable ETCs in a generic proceeding.

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D.T.C. Case No. 12-6

Record Request 9: Does Boomerang agree to provide the Department's consumer services phone number on materials given to consumers at point of sale. (Tr. 71-73)

RESPONSE: Boomerang agrees to include the Department's consumer services phone number on materials given to consumers at point of sale as indicated in the sample advertising, which includes the packet insert that accompanies the Lifeline phones when distributed, submitted in Attachment RR-1A.

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D.T.C. Case No. 12-6

Record Request 10: Does Boomerang agree to notify the Department within 30 days after making material program changes that clearly benefit consumers? (Tr. 75)

RESPONSE: Boomerang agrees to notify the Department of changes which clearly benefit consumers to its Lifeline rates, terms or conditions no later than 30 days after implementing such changes. (Also see response to RR-7(d) above.)

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D.T.C. Case No. 12-6

Record Request 11: Does Boomerang agree to provide 30 days advance notice of all other material program changes (i.e., that do not clearly benefit consumers)? (Tr. 76-77)

RESPONSE: Boomerang agrees to notify the Department of material program changes that may not clearly benefit consumers to its Lifeline rates, terms or conditions 30 days prior to implementing such changes. (Also see response to RR-7(d) above.)

Person Responsible for Answer: James T. Balvanz

In Re:

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D.T.C. Case No. 12-6

Record Request 12: Does Boomerang agree to put Department consumer services phone number on the following materials (Tr. 77-80)

- a) Application
- b) Subscriber receipts
- c) Lifeline terms and conditions
- d) All marketing and advertising

RESPONSE: a) No, due to space limitations on the FCC approved application.

RESPONSE: b) No, Lifeline receipts for services are not issued to a consumer as Boomerang's Lifeline program provides a free phone with free minutes once eligibility is confirmed.

RESPONSE: c) Yes.

RESPONSE: d) Boomerang agrees to include the Department's consumer services phone number on the marketing and advertising materials as identified in Attachment RR-1A with language similar to that indicated in the sample advertising in Attachment RR-1A. (Also see response to RR-7(e) above.)

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D.T.C. Case No. 12-6

Record Request 13: Does Boomerang agree to provide the Department within 30 days of all biennial filings with the FCC pursuant to 47 USC, Section 54.420A? (Tr. 81-82)

RESPONSE: Boomerang agrees to provide a copy of all biennial audits pursuant to the FCC's requirement in 47 CFR, Section 54.420A, if and when implemented, within 30 days of issuance of the final audit report.

Person Responsible for Answer: James T. Balvanz

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D.T.C. Case No. 12-6

Record Request 14: Does Boomerang agree to annually submit a written certification to the Department to verify that

- a) policies and procedures are in place to only invoice legitimate Lifeline customers;
- b) Boomerang is in compliance with federal Lifeline requirements; and
- c) Boomerang has a valid certification from each customer that it meets Lifeline requirements (Tr. 82-83)

RESPONSE: a) Boomerang agrees to provide annually the certification of an officer of Boomerang to verify that Boomerang has policies and procedures in place to review consumer's documentation of income and program-based eligibility.

RESPONSE: b) Boomerang agrees to provide annually the certification of an officer of Boomerang to verify that Boomerang is in compliance with all federal Lifeline certification procedures.

RESPONSE: c) Boomerang agrees to provide annually the certification of an officer of Boomerang to verify that Boomerang has a valid certification form (electronic or paper) for each subscriber for whom the carrier seeks Lifeline reimbursement.

Person Responsible for Answer: James T. Balvanz

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D.T.C. Case No. 12-6

Record Request 15: Relative to the customer service representatives who answer calls, both employees and outsourced

- a) How do they identify themselves when they answer the phone?
- b) How many customer service staff are there and are they organized into particular functions?
(Tr. 94-98)

RESPONSE: a) The Tier-1 customer service representatives answer the phones for both the wholesale and Boomerang customers. The actual customer is identified to the Tier-1 customer service representatives based on their cell phone number:

- i) if they called from their cell phone by dialing 611; or
- ii) if they input their cell phone number when indicated via the IVR after dialing the associated toll free number for customer service.

When the Tier-1 customer service representative responds to the number in queue, their answering script is:

"Thank you for calling [wireless provider] customer service. My name is [first name]. How may I help you?"

The Tier-2 customer service representatives address escalations from Tier-1 customer service representatives that are sent electronically. When calls initially come into the Tier-2 queue, the Tier-2 customer service representatives can't identify the end user or the associated wholesale customer until the wireless phone number is provided. Once the phone number is provided, the Tier-2 customer service representative is able to view the account and history. Thus, the Tier-2 customer service representatives greet the customer, identify themselves and inquire as to the wireless telephone number of the end-user. The Tier 2 customer service representatives' script for answering the phone is as follows:

"Thank you for calling your wireless provider. My name is [first name]. How may I help you?" *If customer response is an account specific inquiry, then, "Can you please provide me your wireless phone number?"*

Or

"Thank you for calling your wireless provider. My name is [first name]. Can you please provide me your wireless phone number?" *Once the number is provided, then the representative continues, "How may I help you?"*

RESPONSE: b) Please see Confidential Response RR15b-Conf. (Chart of Customer Service Staff), filed separately herewith. A Motion for Confidential Treatment also is submitted herewith.

Person Responsible for Answer: James T. Balvanz

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Record Request 16: How long does it take to process a customer at sign up once they get to the front of the line, with respect to

- a) Expected time?
- b) Data on average processing time? (Tr. 114)

RESPONSE: a) Please see Confidential Response RR16a-Conf. (Time to process Customers), filed separately herewith. A Motion for Confidential Treatment also is submitted herewith.

RESPONSE: b) Please see Confidential Response RR16b-Conf. (Time to enroll Customers), filed separately herewith. A Motion for Confidential Treatment also is submitted herewith.

Person Responsible for Answer: James T. Balvanz

Attachment RR1-A
Revised Advertising Materials

FREE
FREE PHONE SERVICE • FREE MINUTES MONTHLY
Supported by Lifeline benefit. A government sponsored program.

FREE PHONE
enTouch Wireless will provide a FREE PHONE
(Not a Lifeline supported benefit)

YOU MAY BE ELIGIBLE FOR THIS BENEFIT IF YOU PARTICIPATE IN:

- FOOD STAMPS
- MEDICAID
- FREE LUNCH
- PUBLIC HOUSING
- SSI
- ON MEET INCOME REQUIREMENTS

DATE: _____
TIME: _____
PLACE: _____

enTouch WIRELESS
POWERED BY BOOMERANG WIRELESS

For Information on this program, visit www.entouchwireless.com or call 1-800-455-4555. ©2011 enTouch Wireless. All rights reserved.

FREE
FREE PHONE SERVICE • FREE MINUTES MONTHLY
Supported by Lifeline benefit. A government sponsored program.

FREE PHONE
enTouch Wireless will provide a FREE PHONE
(Not a Lifeline supported benefit)

YOU MAY BE ELIGIBLE FOR THIS BENEFIT IF YOU PARTICIPATE IN:

- FOOD STAMPS
- MEDICAID
- FREE LUNCH
- PUBLIC HOUSING
- SSI
- ON MEET INCOME REQUIREMENTS

DATE: _____
TIME: _____
PLACE: _____

enTouch WIRELESS
POWERED BY BOOMERANG WIRELESS

For Information on this program, visit www.entouchwireless.com or call 1-800-455-4555. ©2011 enTouch Wireless. All rights reserved.

Flyer 8.5 x 11

Poster 11 x 17

FREE

PHONE
(Not a Lifeline supported benefit)
Provided by enTouch Wireless

MINUTES MONTHLY
Supported by Lifeline benefit. A government sponsored program.

enTouch WIRELESS
POWERED BY BOOMERANG WIRELESS

Yard Sign 24" x 36"

FREE

PHONE
(Not a Lifeline supported benefit)
Provided by enTouch Wireless

MINUTES MONTHLY
Supported by Lifeline benefit. A government sponsored program.

enTouch WIRELESS
POWERED BY BOOMERANG WIRELESS

Banner 6' x 2'



DISCLOSURES

YOU WILL HAVE TO VERIFY AND SIGN THIS DISCLOSURE FORM
IN ORDER TO RECEIVE YOUR LIFELINE PHONE

I acknowledge and consent to enTouch Wireless divulging my name, telephone number and address to the Universal Service Administrative Company (the administrator of this program) and to agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit. In the event that USAC identifies me as receiving more than one Lifeline subsidy per household, I acknowledge and understand that all carriers may be notified so that I may select one service and be de-enrolled from the other.

I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required to do so.

I understand that Lifeline is a federal government benefit program and that willfully making false statements in order to obtain this benefit can be punished by fine or imprisonment or I may be barred from the program.

My household will receive no more than one Lifeline-supported service. Lifeline service is available for only one subscription per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household requirement constitutes a violation of the FCC rules and will result in my de-enrollment from the program, and could result in criminal prosecution by the United States government.

I understand that I must notify enTouch Wireless and provide my new address within 30 days of moving.

If I do not have a permanent address and have supplied instead a temporary address above, I understand that enTouch Wireless will attempt to verify every 60 days that I continue to rely on that address, and that I must notify enTouch Wireless within 30 days of my new address after moving. If I do not respond to enTouch Wireless' address verification attempts within 30 days, I understand that I may be de-enrolled from enTouch Wireless' Lifeline service.

I understand that I must notify enTouch Wireless within 30 days if (i) I cease to participate in a federal or state qualifying program or my annual household income exceeds 135 percent of the federal poverty guidelines; (ii) I receive more than one Lifeline-supported service; or (iii) Another member of my household is receiving a Lifeline benefit or (iv) I for any other reason no longer satisfy the criteria for receiving Lifeline support. I understand that I will be subject to penalties if I fail to follow this notification requirement, including being de-enrolled from the Lifeline program.

I understand and acknowledge that Lifeline service is a non-transferable benefit and that I may not transfer my service to any other individual, including another low-income consumer.

I acknowledge that I will be required to re-certify my eligibility for Lifeline benefits annually, and I may be required to re-certify my continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of my Lifeline benefits.

I hereby authorize the Company to send text messages to my Company provided wireless number about my Lifeline benefit. Text messages sent by the Company will not incur any additional wireless minutes or texts. Standard rates, data and text rates will apply to all messages to and from anyone other than the Company.

I attest under penalty of perjury that the information herein is true and correct to the best of my knowledge.

www.entouchwireless.com

Powered by Boomerang Wireless

Eligibility Requirements

Lifeline is a government sponsored benefit. You can receive a discount on your phone service.

1) You, or one of your dependents, participates in one of these programs:

Supplemental Nutrition Assistance Program (SNAP)	National School Lunch Program (NSLP)
Supplemental Security Income (SSI)	Medicaid (the Massachusetts Health Care Program)
Low Income Home Energy Assistance Program (LIHEAP) (statewide)	Massachusetts Temporary Assistance for Needy Families (TANF) (statewide)
Electronic Federal Payment System (EFPS)	Massachusetts Temporary Assistance for Needy Families (TANF) (statewide)
Temporary Assistance for Needy Families (TANF) (statewide)	

2) Limit 1 Lifeline benefit per household.

One Lifeline program (wireless or landline) per household. Household is defined as an individual or group of individuals living together at the same address as one economic unit.

3) If I am not in qualifying program, I may participate if income qualified.

# Persons in Household	Income	# Persons in Household	Income
1	\$15,012	5	\$37,225
2	\$20,029	6	\$42,647
3	\$25,046	7	\$48,074
4	\$30,063	8	\$53,501

4) Must have valid physical address.

Notify us immediately of any change of address by calling customer service.

5) Cannot choose phone model or phone number.

You are not able to choose the free handset, trade free handset, or choose the phone number on the free handset.

6) Keep Active: Use your phone every 60 days to keep Lifeline benefit active.

7) Must be truthful in application process.

WARNING: If you make false statements to gain benefits, you can be punished by fine or imprisonment or you can be barred from the Lifeline program.

8) Complete the application. Personal documents required.

Complete the application truthfully & accurately.

Documentation for application process: Proof of identity (i.e. Drivers License)

Program eligibility documentation: Current statement of benefits from qualifying program, notice letter of participation, program document (i.e. SSI card), income eligibility documents (i.e. tax return, paycheck stub, VA benefit statements)

9) Recertify annually that you remain eligible for the Lifeline benefits.

Once you receive the Lifeline benefit, you must complete the annual recertification process. Learn more in your welcome package.

For Unlawful Use of Lifeline Service

Massachusetts residents who are not eligible for Lifeline service and who use Lifeline service to obtain a discount on their phone service may be subject to civil and criminal penalties. Call 1-800-392-6066 for more information.



Disclosures Poster 11 x 17

**Eligibility Poster 11 x 17
Flyer 8.5 x 11**

QUESTIONS?

Contact enTouch Customer Service:

Dial 611 from your Lifeline phone or call 1-866-6719 from a landline phone.

If your wireless provider does not resolve the problem, then Massachusetts residents may contact:

Department of Telecommunications and Cable
Consumer Division

1000 Washington Street, Suite 820
Boston, MA 02118-6500

617-905-3531

1-800-392-6066 (toll free)

617-988-8288 (FAX)

http://www.mass.gov/cable/telecom/telecom_consumer_dto.htm



www.entouchwireless.com

Questions Poster 8.5 x 11

www.ontouchwireless.com

Phone # _____

My ESN# _____

Activation Date: _____

Check Balance: Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Programs:

1. Free Lifeline service to Lifeline.
2. Free Lifeline service to Lifeline.
3. Free Lifeline service to Lifeline.
4. Free Lifeline service to Lifeline.

Check Balance: Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Programs:

1. Free Lifeline service to Lifeline.
2. Free Lifeline service to Lifeline.
3. Free Lifeline service to Lifeline.
4. Free Lifeline service to Lifeline.

www.ontouchwireless.com

Phone # _____

My ESN# _____

Activation Date: _____

Check Balance: Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Programs:

1. Free Lifeline service to Lifeline.
2. Free Lifeline service to Lifeline.
3. Free Lifeline service to Lifeline.
4. Free Lifeline service to Lifeline.

Check Balance: Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Programs:

1. Free Lifeline service to Lifeline.
2. Free Lifeline service to Lifeline.
3. Free Lifeline service to Lifeline.
4. Free Lifeline service to Lifeline.

Need More Voice - Data?

Call 611 on your Lifeline phone or call 800-455-8718 from a landline phone. Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Top Up Plans

Plan	Price	Minutes	Text	Data
15	0	100	30	0
110	0	300	30	0
120	1200	200	30	0
130	1200	200	30	0
150	1200	200	30	0

Top Up with These Brands

Find the Best Deal on Your Phone or Call 800-455-8718 from a landline phone.

airFair

Need More Voice - Data?

Call 611 on your Lifeline phone or call 800-455-8718 from a landline phone. Dial 611 on your Lifeline phone or call 800-455-8718 from a landline phone.

Top Up Plans

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Top Up with These Brands

Find the Best Deal on Your Phone or Call 800-455-8718 from a landline phone.

airFair

Insert 8.5 x 11 folded in quarters

Insert 8.5 x 11 folded in quarters

Attachment RR1-B
Revised Massachusetts Lifeline Application

LIFELINE PROGRAM APPLICATION

Lifeline Self-Certification Form

To enroll in the Lifeline America program you need to complete this form. The information is only used to certify with the Federal Communications Commission that you are participating in Lifeline with us.

Lifeline Service Disclosure

Lifeline is a government assistance program and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Only one lifeline benefit is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one per household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and lifeline is a non-transferable benefit and you may not transfer this benefit to any other person, regardless if they qualify for Lifeline.

STEP 1—APPLICANT INFORMATION

USE BLACK OR BLUE INK ONLY

Full Name Phone:

Residential Address*:

Billing Address:

(*No PO Boxes.)

City: State: ZIP:

Email: Birth Date:

Last 4 digits of SSN or Tribal ID* New/Conv? New Phone

ESN:

*Check One:
☐ Permanent
☐ Temporary

STEP 2: CERTIFICATIONS: I participate in the following public assistance programs (check one):

<input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)	<input type="checkbox"/> National School Lunch Program (NSL)
<input type="checkbox"/> Supplemental Security Income (SSI)	<input type="checkbox"/> Medicaid a/k/a Massachusetts Health
<input type="checkbox"/> Low-Income Home Energy Assistance program (LIHEAP) a/k/a Fuel Assistance	<input type="checkbox"/> Massachusetts Emergency Assistance to Elderly, Disabled, and Children (EAEDC)
<input type="checkbox"/> Section 8 Federal Public Housing Assistance	<input type="checkbox"/> Massachusetts Transitional Aid to Families with Dependent Children (TAFDC)
<input type="checkbox"/> Temporary Assistance for Needy Families (TANF)	

My household income is at or below 135% of 2013 federal poverty guidelines. I provided documentation confirming my household income level.			
# Persons in Household	Income	# Persons in Household	Income
1	\$15,512	5	\$37,220
2	\$20,939	6	\$42,647
3	\$26,366	7	\$48,074
4	\$31,793	8	\$53,501

If you do not participate in one of these programs and someone in your household does:

Relationship to Participant: _____
 Documents Reviewed for Certification: _____
 Name of Person Participating: _____

- ☐ I certify that the person demonstrating program participation is a member of my household.
- ☐ I certify that the person name on the participation documentation is not already receiving a Lifeline discount.

STEP 3: CHOOSE YOUR PLAN: Choose one of the following plans. This plan will be reloaded to your phone monthly as long as you are eligible & certified.

FEATURE/ DESCRIPTION	125 FREE MONTHLY MINUTES	250 FREE MONTHLY MINUTES
• Local Calls	Y	Y
• National Long Distance	Y	Y
• Voicemail	Y	Y
• Nationwide Text	Y- 1 text=1 minute	Y- 1 text=1 minute
• Free 411	Y	Y
• Carry Over Minutes Month to Month	Y	N

STEP 4: SIGNATURE (Read, Initial & Sign):

____ (init) I acknowledge and consent to enTouch Wireless divulging my name, telephone number and address to the Universal Service Administrative Company (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit. In the event that USAC identifies me as receiving more than one Lifeline subsidy per household, I acknowledge and understand that all carriers may be notified so that I may select one service and be de-enrolled from the other.

____ (init) I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required to do so.

____ (init) I understand that Lifeline is a federal government benefit program and that willfully making false statements in order to obtain this benefit can be punished by fine or imprisonment or I may be barred from the program.

____ (init) My household will receive no more than one Lifeline-supported service. Lifeline service is available for only one subscription per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the program, and could result in criminal prosecution by the United States government.

____ (init) I understand that I must notify enTouch Wireless and provide my new address within 30 days of moving.

____ (init) If I do not have a permanent address and have supplied instead a temporary address above, I understand that enTouch Wireless will attempt to verify every 90 days that I continue to rely on that address, and that I must notify enTouch Wireless within 30 days of my new address after moving. If I do not respond to enTouch Wireless' address verification attempts within 30 days, I understand that I may be de-enrolled from enTouch Wireless' Lifeline service.

____ (init) I understand that I must notify enTouch Wireless within 30 days if (1) I cease to participate in a federal or state qualifying program or my annual household income exceeds 135 percent of the federal poverty guidelines; (2) I receive more than one Lifeline-supported service; or (3) Another member of my household is receiving a Lifeline benefit or (4) I for any other reason no longer satisfy the criteria for receiving Lifeline support. I understand that I will be subject to penalties if I fail to follow this notification requirement, including being de-enrolled from the Lifeline program.

____ (init) I understand and acknowledge that Lifeline service is a non-transferable benefit and that I may not transfer my service to any other individual, including another low-income consumer.

____ (init) I acknowledge that I will be required to re-certify my eligibility for Lifeline benefits annually, and I may be required to re-certify my continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of my Lifeline benefits.

____ (init) I hereby authorize the Company to send text messages to my Company provided wireless number about my Lifeline benefit. Text messages sent by the Company will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than the Company.

____ (init) I attest under penalty of perjury that the information herein is true and correct to the best of my knowledge.

Applicants Signature, _____ Date: _____

Agents Signature, _____ Date: _____

Office Use Only.

PLACE PHONE ID
STICKER HERE.

Questions? Call 866-488-8719 for Customer Service.

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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

D.T.C. 12-6

**MOTION OF BOOMERANG WIRELESS, LLC FOR
CONFIDENTIAL TREATMENT OF RECORD RESPONSES**

Pursuant to G.L. c. 25C, § 5, Boomerang Wireless, LLC

("Boomerang" or the "Company") hereby requests that the Department of Telecommunications and Cable (the "Department") grant protective treatment to certain confidential and competitively sensitive information submitted as part of Boomerang's responses to the Department's Record Requests, filed herewith, specifically Boomerang's Responses to Request Nos. 5, 6, 15b and 16. Boomerang seeks to restrict from public disclosure only information that, if made available to the public, would allow Boomerang competitors to know valuable non-public information about the Company.

I. LEGAL STANDARD

Under the well-established standards established by the Department's predecessor, confidential information may be protected from public disclosure in accordance with G.L. c. 25C, § 5, which states in part that:

The [D]epartment may protect from public disclosure, trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of

proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which such protection is sought is public information and the burden shall be upon the proponent of such protection to prove the need for such protection. Where such a need has been found to exist, the [D]epartment shall protect only so much of the information as is necessary to meet such need.

In interpreting the statute, the Department's predecessor has held that:

. . . [T]he burden on the company is to establish the need for protection of the information cited by the company. In determining the existence and extent of such need, the Department must consider the presumption in favor of disclosure and the specific reasons why disclosure of the disputed information benefits the public interest.¹

Thus, the moving party must prove that: (1) the information for which protection is sought constitutes trade secrets, confidential, competitively sensitive or other proprietary information; and (2) there is a need to ensure nondisclosure of the information.² Where a party proves such a need, the Department may limit the length of time that such protection is in effect.³

¹ The Berkshire Electric Company, et al., D.P.U. 93-187/188/189/190, at 16 (1994); see generally Jet Spray Cooler, Inc. v. Crampton, 361 Mass. 835 (1972) (establishing general procedures for trade secret and other confidential information); accord Petition of YourTel, Inc. for ETC Designation, Hearing Officer Ruling on Motion for Protection for Public Disclosure, D.T.C. 11-1 at pp. 2-3 (July 6, 2011) (discussing legal standards) (hereinafter "YourTel Order").

² The Berkshire Gas Company, D.T.E. 01-41, at 16 (2001); see also YourTel Order at pp. 2-3.

³ Id. (emphasis added); accord YourTel Order, at pp. 2-3.

II. BASIS FOR CONFIDENTIALITY

A. Record Response 5

Record Request No. 5 seeks specific information about Boomerang's wholesale business interests, including Lifeline customer information by state with respect to each of its wholesale contracting partners. Disclosure of this information would provide insight into Boomerang's strategies in the competitive marketplace and its precise successes in reaching wholesale agreements with other Lifeline carriers. This is sensitive, non-public information with respect to Boomerang and each of its wholesale customers and, accordingly, merits protection. Boomerang hereby certifies that it does not make this information customarily available in the public domain and has taken care to handle this information consistent with its sensitive nature.

B. Record Response 6

Record Request No. 6 requests the specific revenues Boomerang receives from Lifeline and non-Lifeline telecommunications services, respectively. Disclosure of this information would provide insight into Boomerang's successes in the competitive marketplace. The response provides competitively sensitive, nonpublic information regarding these segments of Boomerang's businesses the disclosure of which would potentially harm Boomerang in the marketplace. Boomerang hereby certifies that it does not make this information customarily available in the

public domain and has taken care to handle this information consistent with its sensitive nature.

C. Record Response 15b

Record Request 15b requests operational information regarding the manner in which Boomerang handles customer service calls, both low level (Tier 1) and higher level (Tier 2). The information identifies the number of customer service representatives at the various Tiers and the wholesale customer calls and Company calls that they handle. Though the 800 numbers are public information, their identification in this docket would reveal the identity of Boomerang's wholesale customers to which it provides customer services. And, in conjunction with some of the other confidential information, distribution of the 800 numbers would reveal the types of services that Boomerang provides to those wholesale customers. Boomerang hereby certifies that, with the exception of the Boomerang/enTouch 800 number, it does not make this information customarily available in the public domain and has taken care to handle this information consistent with its sensitive nature.

D. Record Response 16

Record Request 16 seeks specific estimated and actual time figures for how fast Boomerang processes new customers at customer marketing events. This level of operational detail is competitively sensitive and the disclosure of it potentially would harm Boomerang's standing in the competitive marketplace. Boomerang hereby certifies that

it does not make this information customarily available in the public domain and has taken care to handle this information consistent with its sensitive nature.

III. SCOPE OF PROTECTION

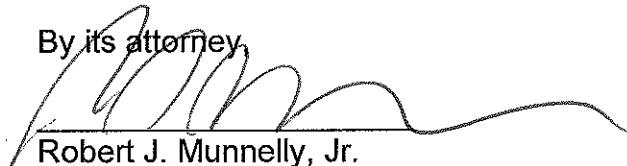
Given the confidential and sensitive nature of the information sought to be protected, Boomerang requests a minimum of five (5) years for information disclosed in the Responses.⁴ This will maximize chances that the information would become competitively stale by the time it is disclosed. Boomerang hereby reserves the right to request an extension at a later date, if necessary, if it believes that the information remains sensitive beyond the requested five year period.

IV. CONCLUSION

Accordingly, for the foregoing reasons, Boomerang requests that the Department grant confidential treatment under G.L. c. 25C, § 5 to the Responses to Record Request Nos. 5, 6, 15b and 16.

BOOMERANG WIRLESS LLC

By its attorney,



Robert J. Munnely, Jr.
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Date: March 12, 2013

⁴ See YourTel Order, pp. 5-6 (highlighting five years as a reasonable period of protection for certain competitively sensitive wireless ETC carrier information).

COMMONWEALTH OF MASSACHUSETTS

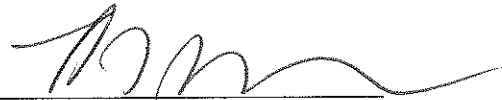
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Boomerang Wireless, LLC)	
For Limited Designation as a Lifeline-)	
Only Eligible Telecommunications Carrier)	D.T.C. 12-6

CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy by hand or by first class mail of the Public Record Responses of Boomerang Wireless, LLC and Motion of Boomerang Wireless, LLC for Confidential Treatment of Record Responses for the above-captioned proceeding in accordance with the requirements of 220 CMR 1.05(1).

BOOMERANG WIRELESS, LLC



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Date: March 12, 2013