

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

Investigation by the Department
on its Own Motion into the Implementation
in Massachusetts of the Federal Communications
Commission's Order Reforming the Lifeline Program

D.T.C. 13-4

COMMENTS OF ASSURANCE WIRELESS USA, L.P.

Assurance Wireless USA, L.P. ("Assurance"), a fully owned subsidiary of T-Mobile, submits these comments in response to the Notice of Proposed Requirements and Further Request for Comment ("Notice") issued on April 3, 2024 in the above-referenced docket. In that Notice, the Department of Telecommunications and Cable ("Department") seeks comment on the Department's proposed updates to its Lifeline requirements for eligible telecommunications carriers ("ETCs"). Specifically, the Department seeks comments on a variety of questions related to the Lifeline program and reporting to the Department.

COMMENTS ON DEPARTMENT QUESTIONS

Assurance responds to the Department's questions as follows:

1. This question is not relevant to Assurance as it applies to newly designated ETCs.
2. If the Department wants carriers to report categories of de-enrollment data collected in Section A(3)(b), Assurance proposes that the Department use two categories: de-enrollment due to non-usage and de-enrollment due to failure to recertify. These are the most common reasons for de-enrollment and can be provided to the Department without significant effort.

3. Assurance supports moving the reporting of complaint data required by Section A(4) to Section A(3) in order to consolidate reporting into one March 1 deadline.
4. Assurance proposes that the definition of “complaint” be limited to actual complaints about service rather than mere inquiries to a carrier. Thus, Assurance proposes that the current definition be modified to remove “inquires about” such that the definition reads: “complaint is defined as a correspondence or communication received by the ETC from, or on behalf of, a person that expresses dissatisfaction with the ETC.”
5. Assurance does not believe that it is necessary to report complaints by categories under Section A(4)(a). However, to the extent the Department wants categories of complaints to be reported, Assurance proposes that there be four categories. Specifically, the categories should be: equipment, eligibility, network issues and other. These are the most common categories of complaints received about Lifeline services.
6. The Department should not define specific time limits for ETCs to resolve subscriber disputes under Section B(1)(a). The current rules already require ETCs to work in good faith with the Department and to resolve disputes within a reasonable time. Assurance prides itself on its customer service and its ability to promptly address customer issues. However, there may be times that reaching a customer can be difficult, thereby leading to a delay in resolving a complaint due to no fault of the ETC. There has been no indication that Assurance has been slow to resolve customer complaints. To the extent that some ETCs are not resolving complaints on a timely basis, the Department should address that specific ETC’s performance directly rather than impose requirements on the entire industry.

7. Assurance currently delivers termination of service notices via mail. A sample is attached to these comments.
8. Assurance already provides the Department's contact information and a notice regarding the Consumer Division's availability to handle Lifeline complaints to customers in Spanish. There should not be an additional requirement to provide such information in multiple languages. Given the ready availability of translation services, customers should be able to easily translate notices to their native language if needed.
9. Assurance does not charge termination fees for the early termination of Lifeline service.
10. For purposes of Section A(5), "affiliate" should be limited to entities that provide Lifeline service in Massachusetts only. The Commission should not use the definition of affiliate as defined in 47 U.S.C. §153(2) because many affiliates operate in other states, or provide non-Lifeline service and are not subject to the Department's jurisdiction. With respect to the reporting requirements, Assurance notes that requiring established carriers who operate in multiple jurisdictions to provide notice of every single withdrawal of an ETC designation in any state is extremely burdensome and does not provide valuable information to the Department. Further, to the extent an affiliate operating in another state files for ETC status but then withdraws it, that information is irrelevant to the provision of Lifeline service in Massachusetts. In addition, it would be extremely burdensome and unnecessary to require an ETC or any affiliate (including those that do not provide services that are regulated by the Department) to notify the Department in every instance where an investigation or court proceeding is opened by any government agency in any jurisdiction. To the extent the Department desires to collect such information, it should be limited to Lifeline services that are impacted in Massachusetts.



PO Box 5040
Charleston, IL 61920-9907

Service End Date: March 14, 2022

Use your Assurance Wireless phone to make a call, send a text or go online (not using Wi-Fi) by the above date or you will lose your FREE phone service.

----- manifest line -----



March 28, 2022

Dear [REDACTED],

You are at risk of losing your FREE Assurance Wireless service by **March 14, 2022**.

It has been about 25 days since you have used your Assurance Wireless phone. If you do not use your Assurance Wireless service at least once every 30 days to keep your account active, your FREE service will be turned off and you will be removed from the federal government program(s) which you are currently enrolled in.

Which federal government programs support Assurance Wireless FREE services?

Assurance Wireless FREE service(s) are supported by the Lifeline program and/or the Affordable Connectivity Program (ACP). The FCC requires program participants to use their service at least once every 30 days. After 30 consecutive days of non-usage, the subscriber will be de-enrolled from the federal government program(s) if they do not cure their non-usage in 15 days.

What counts as eligible phone usage to keep my Assurance Wireless account active?

To keep your account active, use your Assurance Wireless phone to make a call, answer a call, send a text or use your FREE mobile data plan (using Wi-Fi does not count) to connect to the Internet.

How do I use my FREE Assurance Wireless mobile data plan, instead of Wi-Fi, to connect to the Internet?

It's easy. The fastest way to switch between Mobile Data and Wi-Fi is through the Notifications Panel. Simply pull down the Notifications Panel found at the top of the phone screen by swiping your finger in a downward motion. Look for the "Mobile Data" icon and tap the icon to toggle "Mobile Data" On and Off. Make sure to use your FREE mobile data at least once a month.

If you do not use your service by **March 14, 2022** you will lose your FREE Assurance Wireless service and be removed from the federal government program(s) which you are currently enrolled in. You will have to re-apply for these federal government program(s) if you wish to continue receiving FREE Assurance Wireless service.

If you have any questions, please call us at 1-888-321-5880. Thank you for being an Assurance Wireless customer.

Sincerely,

Assurance Wireless
A Worry-Free Way to Stay Connected

P.S. Don't wait! Use your Assurance Wireless phone by March 14, 2022 to make a call, send a text or go online (using Wi-Fi does not count) or your FREE phone service will be shut off.

Assurance Wireless Lifeline offer is part of the government Lifeline Assistance program. Only eligible consumers may enroll in the program; Lifeline benefit is limited to one discount (landline or wireless) per household and is non-transferable. Additional terms apply.

The Affordable Connectivity Program (ACP) is a government program that reduces the customer's broadband internet access service bill. One discount per eligible household and is non-transferable across households. An eligible household may obtain ACP-supported broadband service from any participating provider of its choosing and may apply ACP benefit to any broadband service offering of the participating provider at the same terms available to households that are not eligible for ACP-supported service. ACP service provider may disconnect the household's ACP-supported service after 90 consecutive days of non-payment; the household will be subject to the provider's undiscounted rates and general terms and conditions if the program ends, if the consumer transfers their benefit to another provider but continues to receive service from the current provider, or upon de-enrollment from ACP. A household may file a complaint against its provider via the FCC's Consumer Complaint Center, consumercomplaints.fcc.gov; visit acpbenefit.org for more information on ACP. **Other terms:** Offers not avail. in all states/areas & may vary by state. Coverage is not avail. everywhere. Assurance Wireless reserves the right to change or cancel offers at any time. Prohibited network use rules & other restrictions apply. By activating your device and service, you agree to the Assurance Wireless Terms and Conditions. See terms (**including arbitration provision**) and details at assurancewireless.com. © 2022 Assurance Wireless USA, L.P.



Fecha de finalización del servicio: March 14, 2022

Use su teléfono de Assurance Wireless para hacer una llamada, enviar un mensaje de texto o entrar a Internet (sin usar Wi-Fi) a más tardar para la fecha que se indica arriba, o de lo contrario perderá su servicio telefónico GRATIS.

Corre el riesgo de perder su servicio de Assurance Wireless GRATIS para el **March 14, 2022**.

Han pasado unos 25 días desde que usó su teléfono de Assurance Wireless. Si no usa su servicio de Assurance Wireless al menos una vez cada 30 días para mantener activa su cuenta, su servicio GRATIS será suspendido y se le dará de baja del programa o programas del gobierno federal en los que esté inscrito actualmente.

¿Qué programas del gobierno federal apoyan los servicios de Assurance Wireless GRATIS?

El(los) servicio(s) de Assurance Wireless GRATIS son respaldados por el programa Lifeline y/o el Programa de Descuentos para Internet (ACP, por sus siglas en inglés). La FCC exige a los participantes en el programa que utilicen su servicio al menos una vez cada 30 días. Después de 30 días consecutivos de falta de uso, el suscriptor será dado de baja de los programas del gobierno federal si no subsanan la falta de uso en 15 días.

¿Qué cuenta como uso de teléfono elegible para mantener activa mi cuenta de Assurance Wireless?

A fin de mantener activa su cuenta, use su teléfono de Assurance Wireless para hacer una llamada, contestar una llamada, enviar un mensaje de texto o usar sus datos móviles GRATIS (usar Wi-Fi no cuenta) para conectarse a Internet.

¿Cómo uso mi plan de datos móviles de Assurance Wireless GRATIS, en lugar de Wi-Fi, para conectarme a Internet?

Es muy fácil. La forma más rápida de cambiar entre Datos móviles y Wi-Fi es a través del Panel de notificaciones. Simplemente mueva hacia abajo el Panel de notificaciones que se encuentra en la parte superior de la pantalla del teléfono deslizando el dedo en un movimiento hacia abajo. Busque el icono "Mobile Data" (Datos móviles) y toque el icono para activar y desactivar los Datos móviles. Asegúrese de utilizar sus datos móviles GRATIS al menos una vez al mes.

Si no utiliza su servicio a más tardar el **March 14, 2022**, perderá su servicio de Assurance Wireless GRATIS y se le dará de baja del programa o programas del gobierno federal en los que esté inscrito actualmente. Tendrá que volver a hacer su solicitud del programa o programas del gobierno federal si desea seguir recibiendo el servicio de Assurance Wireless GRATIS.

Si tiene alguna pregunta, por favor llámenos al 1-888-321-5880. Gracias por ser cliente de Assurance Wireless.

Atentamente,

Assurance Wireless

Una Forma Libre de Preocupaciones para Mantenerse Conectado

P.S. ¡No espere! Use su teléfono de Assurance Wireless a más tardar el March 14, 2022 para hacer una llamada, enviar un mensaje de texto o entrar a Internet (usar Wi-Fi no cuenta), o su servicio telefónico GRATIS será suspendido.

La oferta del servicio Lifeline de Assurance Wireless es parte del programa gubernamental de asistencia Lifeline. Solo los consumidores elegibles pueden inscribirse en el programa; el beneficio de Lifeline está limitado a un descuento (línea fija o móvil) por hogar y no es transferible. Se aplican términos adicionales.

El Programa de Descuentos para Internet (ACP, por sus siglas en inglés), es un programa gubernamental que reduce la factura del servicio de acceso a Internet de banda ancha del cliente. Un descuento por hogar elegible y no es transferible entre hogares. Los hogares elegibles pueden obtener servicio de banda ancha compatible con ACP de cualquier proveedor participante de su elección y podrán aplicar el beneficio de ACP a cualquier oferta de servicio de banda ancha del proveedor participante en los mismos términos disponibles para los hogares que no son elegibles para el servicio compatible con ACP. El proveedor del servicio de ACP puede suspender el servicio compatible con ACP del hogar después de 90 días consecutivos de falta de pago; el hogar estará sujeto a las tarifas sin descuento del proveedor y a los términos y condiciones generales si el programa finaliza, si el consumidor transfiere su beneficio a otro proveedor pero continúa recibiendo el servicio del proveedor actual, o al momento de la cancelación de la inscripción de ACP. Un hogar puede presentar una queja contra su proveedor a través del Centro de quejas del consumidor de la FCC, consumercomplaints.fcc.gov; visite acpbenefit.org para obtener más información sobre ACP. **Otros términos:** ofertas no disponibles en todos los estados/áreas y podrían variar por estado. La cobertura no disponible en todas partes. Assurance Wireless se reserva el derecho de cambiar o cancelar las ofertas en cualquier momento. Se aplican las reglas que rigen el uso prohibido de la red y otras restricciones. Al activar su dispositivo y servicio, usted acepta los Términos y Condiciones de Assurance Wireless. Consulte los términos (incluida la disposición de arbitraje) y los detalles en assurancewireless.com. © 2022 Assurance Wireless USA, L.P.

