

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 22-2 September 12, 2025

Petition of AirVoice Wireless, LLC for Limited Designation as an Eligible Telecommunications Carrier (ETC)

## RECORD REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO AIRVOICE WIRELESS, LLC

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to AIRVOICE WIRELESS, LLC the following record requests:

## Instructions

The following instructions apply to this set of record requests.

- 1. All answers should be filed with the Department by the close of business on **September 25**, **2025**.
- 2. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
- 3. The term "AirVoice" means AirVoice Wireless, LLC d/b/a AirTalk Wireless and its corporate predecessors, agents, officers, employees, and assigns.
- 4. The term "Amended Petition" means AirVoice's amended application for designation as an ETC which the Department received on October 2, 2024.
- 5. The term "ETC" means eligible telecommunications carrier.
- 6. The term "FCC" means the Federal Communications Commission.
- 7. The term "Response to Third Set of Information Requests" refers to the document *Responses* to Department's Third Set of Information Requests of AirVoice Wireless, LLC D/B/A AirTalk Wireless Designation Telecommunications Carrier for the Purpose of Providing Lifeline Service filed on May 13, 2025.

- 8. Requests shall be deemed continuing so as to require further supplemental responses if AirVoice and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 9. If any of these requests are ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

## Requests

- R.R. 1-1 Refer to AirVoice's Response to Third Set of Information Requests, D.T.C. 3-7.
  - A. For customers returning devices for the year 2024, provide the number of such returns that were denied for repair, replacement, or refund. Provide the numbers by category.
  - B. For customers returning devices for the year 2024, provide the percentage of returns that were denied for repair, replacement, or refund. Provide the numbers by category.
  - C. For the year 2024, provide the total number of devices distributed by AirVoice to its customers.
  - D. For the year 2024, provide the total number of devices returned to AirVoice by its customers.
- R.R. 1-2 Refer to AirVoice's Response to Third Set of Information Requests, D.T.C. 3-39.
  - A. Explain how AirVoice defines "extended period" in paragraph A.
  - B. For the years 2023 and 2024, provide the number of customers for whom international service was temporarily disabled. Provide the average length of time such service was disabled.
  - C. Explain how the customer is notified when international service is temporarily disabled. Explain whether these customers are provided with instructions for reactivating the service.
  - D. Explain whether customers are notified about the potential for disabled service when signing up for AirVoice service.
- R.R. 1-3 Provide examples of the "Cashback, Freebies and Loyalty programs" described in Exhibit 3 of the Amended Petition and any applicable terms and conditions for such examples.
- R.R. 1-4 Provide the most recent (A) code of conduct and (B) compliance manual from the FCC compliance plan as described in Attachment 3-25 of AirVoice's Response to Third Set of Information Requests.

- R.R. 1-5 Refer to AirVoice's Response to Third Set of Information Requests, D.T.C. 3-13.
  - A. Provide the number of customer complaints received by AirVoice relating to data caps on the unlimited plan as described in D.T.C. 3-13. Explain which complaint category AirVoice would define this type of complaint as (*see* AirVoice's Response to the Third Set of Information Requests, D.T.C. 3-5).
  - B. For the year 2024, provide the number of customers that reached the data limit or cap for each type of service plan that AirVoice offers (*see* Attachment 3-9, Section H of AirVoice's Response to Third Set of Information Requests).