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VIA ELECTRONIC DELIVERY AND U.S. MAIL

Ms. Shonda Green, Secretary
Department of Telecommunications and Cable
One Federal St., Suite 0740
Boston, MA 02110-2012

September 25, 2025

**RE: AirVoice Wireless, LLC d/b/a AirTalk Wireless D.T.C. 22-2; Responses to
Department's Record Requests Dated September 12, 2025**

Dear Ms. Green:

On behalf of AirVoice Wireless, LLC d/b/a AirTalk Wireless (“AirVoice”), attached for filing with the Massachusetts DTC, please find responses and associated documents for the Department of Telecommunications and Cable’s Record Requests dated September 12, 2025.

The public redacted versions of the Responses and a Motion for Protective Treatment are attached for filing and service by email. The confidential version of the Responses will be filed today by US Mail under this same cover letter.

If you have any questions, please do not hesitate to contact me or Hans Eysenbach at heysenbach@verrill-law.com.

Respectfully submitted,

/s/ Geoffrey G. Why

Geoffrey G. Why
Hans C. Eysenbach

Counsel for AirVoice Wireless, LLC

CC: service list

**AIRVOICE WIRELESS, LLC RESPONSES TO
INFORMATION REQUESTS FROM PUBLIC HEARING OF SEPT. 11, 2025
BY DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 22-2

September 25, 2025

- 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.

Response:

- A. Based on AirVoice’s records for 2024, AirVoice declined 17 of the 107 requests by Lifeline customers to issue a refund for a returned device. AirVoice agreed to repair or replace all the devices returned by Lifeline customers with requests for repair or replacement of the device.**
- B. As stated, based on our records, in 2024 there were 17 device returns and refund requests by Lifeline customers that were denied by AirVoice. This represents approximately 15.89% of all devices returned with a request for refund (107 total) and approximately 2.6% of all 652 devices returned for either a refund, repair, or replacement device).**

In 2024, AirVoice did not deny any requests to repair a device returned by a Lifeline customer. Therefore, 0% of the overall requests to repair a returned device were denied in 2024.
- C. According to AirVoice’s records, AirVoice distributed 647,599 devices at no cost to Lifeline subscribers in 2024.**
- D. Based on AirVoice’s records, Lifeline subscribers returned 662 devices. This figure includes 555 devices returned for repair and replacement (categorized as warranty replacements) and 107 devices returned for refund requests.**

Response prepared by: Octavia Clanton and Hugo Vo

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D.T.C. 22-2

September 25, 2025

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.

Response:

- A. Based on AirVoice’s current policy, an “extended period” means 45 consecutive days during which no outbound international calls are detected on a customer’s line. In such cases, the international calling feature will be temporarily disabled.**
- B. For the years 2023 and 2024, no customers had the international calling feature temporarily disabled. The system control enabling AirVoice to temporarily disable international calling for accounts with no international usage was implemented in January 2025. Accordingly, this measure was not applied to any customer accounts in 2023 or 2024, and therefore, in 2023-2024 there was no average duration that international calling was disabled.**
- C. When the system temporarily disables the international calling feature, customers are notified by both email and SMS. The notification explains that the feature has been turned off due to non-usage and includes instructions for reactivation.**

Customers may restore the feature at any time by logging into their account, navigating to the Plan Features section, and toggling the “International Calling” option on. They may also contact customer support, who can re-enable the feature upon request. In either case, reactivation is immediate and provided at no charge to the customer.
- D. The terms and conditions specific to international calling indicate that the international calling feature may be temporarily disabled due to patterns of unreasonable use or prolonged non-use. Customers are notified at the time the feature is disabled and are provided clear, no-fee reactivation instructions as described above.**

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D.T.C. 22-2

September 25, 2025

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.

Response:

“Cashback, Freebies and Loyalty programs” refers to the benefits available for Lifeline subscribers under our Loyalty program. Customers earn points for each month they remain an active AirVoice subscriber and may also earn points by successfully referring a friend or family member to become an AirVoice customer. Points may be redeemed for certain rewards, such as data top-ups or Amazon e-gift cards.

Only active customers are eligible to redeem points. If service with AirVoice ends, any unused or pending points are removed, and if the customer later re-applies, their account begins with a balance of zero points. AirVoice is also evaluating additional redemption options, such as vouchers for devices or accessories, but these are not currently available.

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D.T.C. 22-2

September 25, 2025

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.

Response:

AirVoice provides in Exhibit 1-4 the Wireless Code of Conduct to which it adheres as part of its compliance plan. To clarify, the reference to the "compliance manual" refers to AirVoice's use of the compliance plan itself as a resource for recurring compliance training with its employees. AirVoice will clarify this reference to a "compliance manual" in its next updated compliance plan that it plans to submit to the FCC in March 2026.

Response prepared by: Octavia Clanton and Hugo Vo

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D.T.C. 22-2

September 25, 2025

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 the Third Set of Information Requests.)

Response:

- A. AirVoice does not have a record or objective basis to distinguish customer interactions that are properly classified as “complaints” relating to data caps on its Lifeline plan.**

For this request, we have reported all customer contacts made by customers reaching the data cap on the Lifeline Unlimited Plan and Lifeline Unlimited Plan [Tribal], including both formal complaints and inquiries (such as when customers sought clarification regarding the data cap or requested assistance with data top-up). Each contact is counted separately, even if made by the same customer more than once.

Because the unlimited plans were first introduced in June 2024 following the conclusion of the ACP program, data is available only for two years:

- **2024: 61 instances**
- **2025 (through September 17, 2025): 55 instances**

Consistent with AirVoice’s categorization of complaints described in its response to D.T.C. 3-5, this type of complaint would be classified as “Product Complaints.”

R.R. 1-5 Refer to AirVoice’s Response to Third Set of Information Requests, D.T.C. 3-13, continued

B. Prior to June 2024, when the Affordable Connectivity Program (ACP) concluded, Lifeline and ACP subscribers were eligible for the Lifeline/ACP Benefit Plan with 4.5GB of monthly data, while Lifeline Tribal subscribers were eligible for the Lifeline/ACP Benefit Plan [Tribal] with 8GB of monthly data.

Beginning in June 2024, new mobile service plans became available for both Lifeline and Lifeline Tribal subscribers. AirVoice Lifeline customers may upgrade or downgrade between plans during their service lifecycle. The current data caps for each plan are explained in the AirTalk broadband labels on the website (<https://airtalkwireless.com/plans>). As of 2025, the Lifeline Unlimited Plan’s data cap increased to 85GB.

The number of customers who reached the data cap in 2024 is as follows:

BEGIN CONFIDENTIAL

[REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

END CONFIDENTIAL

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