



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

D.T.C. 22-2

December 22, 2025

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

**FOURTH SET OF INFORMATION REQUESTS BY 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 information requests:

Instructions

The following instructions apply to this set of information requests.

1. All answers should be filed with the Department by the close of business on February 5, 2026.
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 “ACP” means Affordable Connectivity Program.
4. The term “AirVoice” means AirVoice Wireless, LLC d/b/a AirTalk Wireless and its corporate predecessors, agents, officers, employees, and assigns.
5. The term “Amended Petition” means AirVoice’s amended application for designation as an ETC which the Department received on October 2, 2024.
6. The term “AirVoice’s Response to Third Set of Information Requests” refers to the *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, D.T.C. 22-2 (May 13, 2025)*.

7. The term “AirVoice’s Response to Record Requests” refers to *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)*.
8. The term “ETC” means eligible telecommunications carrier.
9. The term “FCC” means the Federal Communications Commission.
10. The term “USF” means Universal Service Fund.
11. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
12. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used by AirVoice in developing the projections or estimates.
13. 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.
14. 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

D.T.C. 4-1 Regarding employment by AirVoice:

- A. Provide the total number of AirVoice employees.
- B. Provide a breakdown of the number provided in Item A above by job classification and description.
- C. Refer to page 15 of the Amended Petition and AirVoice’s Response to Third Set of Information Requests, D.T.C. 3-31. In the Amended Petition, AirVoice states that “AirVoice’s senior management team has over thirty years of combined experience working in the wireless

telecom industry and over ten years of experience managing the non-Lifeline and Lifeline wireless service offered by AirVoice and its affiliates.”

1. Provide the names, titles, and job duties of this senior management team and the number of years of wireless telecom industry experience each member has.
2. Provide the names, titles, and job duties of any other managers that oversee any of AirVoice’s operations.

D. Clarify whether AirVoice hires contractors to conduct significant portions of its operations, including but not limited to customer support roles. If yes, provide complete and detailed documentation on how such contractors are engaged, where the contractors are located, what duties are assigned to the contractors, and how such contractors are managed.

E. Confirm whether AirVoice has any elected officers. Provide the names and titles of such officers.

D.T.C. 4-2 Refer to AirVoice’s Response to Third Set of Information Requests, D.T.C. 3-39.

- A. For the year 2025 (year-to-date), provide the number of customers for whom international service was temporarily disabled.
- B. Provide the average length of time such service was disabled.

D.T.C. 4-3 Refer to the Order and Consent Decree issued by the FCC on February 28, 2024 (DA 24-175).

A. Refer to Paragraph 13 on page 5 which states: “Within fifteen (15) calendar days after the Effective Date, Air Voice shall designate a senior corporate manager with the requisite corporate and organizational authority to serve as a Compliance Officer and to discharge the duties set forth below. Within ten (10) calendar days of that designation, Air Voice will notify the Enforcement Bureau of the name of the individual so designated and will advise the Enforcement Bureau upon any change in such designation. The person designated as the Compliance Officer shall be responsible for developing, implementing, and administering the Compliance Plan and ensuring that Air Voice complies with the terms and conditions of the Compliance Plan and this Consent Decree. In addition to the general knowledge of the Communications Laws necessary to discharge his or her duties under this Consent Decree, the Compliance Officer shall have specific knowledge of the Lifeline Rules and ACP Rules prior to assuming his/her duties.” Confirm whether AirVoice designated such individual to serve as a Compliance Officer, provide the name of such individual, and explain how such individual satisfied the requirements of this paragraph.

- B. Refer to Paragraph 14 on page 6. Confirm AirVoice has satisfied all requirements of this paragraph. Provide complete and detailed documentation on the following:
1. A copy of the Compliance Plan;
 2. A copy of the Operating Procedures;
 3. An explanation regarding the individuals who were designated as Covered Employees and their names and titles;
 4. A copy of the Compliance Checklist;
 5. Confirmation on whether AirVoice has reviewed and revised the Operating Procedures and Compliance Checklist as described in in sub-paragraph (a);
 6. A copy of the Compliance Manual;
 7. Confirmation on whether AirVoice has reviewed and revised the Compliance Manual as described in in sub-paragraph (b);
 8. A copy of the Compliance Training Program and a full description of how the training program was implemented and for which employees; and
 9. Confirmation on whether AirVoice has reviewed and revised the Compliance Training Program as described in sub-paragraph (c).
- C. Refer to Paragraph 16 on page 7. Provide copies of the two Compliance Reports that were required to be filed with the FCC.

D.T.C. 4-4 Provide a status update for the ETC petitions referenced in AirVoice’s Response to Third Set of Information Requests, D.T.C. 3-20.

D.T.C. 4-5 Compare (1) the Amended Petition at page 4 which states that “AirVoice manages all aspects of the customer experience, including marketing, enrollment assistance to confirm eligibility for Lifeline, selection of a handset, and live 24/7 customer service”, (2) AirVoice’s Response to Third Set of Information Requests, D.T.C. 3-2 which states that AirVoice provides customer support during specified days and times, including Saturday, and (3) AirVoice’s website at <https://airvoicewireless.com/contact-us?srsltid=AfmBOoq7sI-NFeCI-CitzxLjdsag5DleqmIbI5jOvbBbL5hniDlxkKBd> (last accessed November 17, 2025) which states that contact hours are Monday through Friday. Explain this discrepancy.

D.T.C. 4-6 Refer to the Amended Petition at Page 20 which states that “[a]ll customer-facing employees and customer care representatives must demonstrate their

understanding of AirTalk’s and the FCC rules and policies by completing AirTalk’s Lifeline training.” Provide complete and detailed documentation on this training, including how often trainings are conducted and how they are administered.

D.T.C. 4-7 Refer to AirVoice’s Response to Record Requests 1-3 regarding AirVoice’s loyalty program points.

- A. Provide the breakdown or chart of points needed for each specific reward.
- B. Explain whether AirVoice has any plans on allowing points to go towards a credit for a customer’s account.