

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

April 19, 2024

VIA ELECTRONIC DELIVERY

Ms. Shonda Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, Massachusetts 02118

Re: AirVoice Wireless, LLC d/b/a AirTalk Wireless
D.T.C. 22-2; Supplemental Responses to Information Requests

Dear Ms. Green,

On behalf of AirVoice Wireless, LLC d/b/a AirTalk Wireless ("AirVoice"), attached please find supplemental responses to the Department of Telecommunications and Cable's First and Second Set of Information Requests.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.

*Attorneys for AirVoice Wireless, LLC
d/b/a AirTalk Wireless*

Attachment(s)

**SUPPLEMENTAL RESPONSES TO FIRST SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

D.T.C. 1-3 Provide audited financial statements which AirVoice believes demonstrate AirVoice's financial capability of providing the supported services under 47 C.F.R. §§ 54.201(h), 54.202(a)(4).

Supplemental Response:

AirVoice does not have audited financials. See CONFIDENTIAL Revised Exhibit 1-3 for updated unaudited financials.

Response prepared by: Octavia Clanton, Compliance Associate

**SUPPLEMENTAL RESPONSES TO FIRST SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

D.T.C. 1-13 Provide the number of consumer complaints received by AirVoice in each of the last three years from Lifeline subscribers for the following categories, 1) billing, 2) finance, 3) network coverage, 4) operational, 5) product, and 6) trouble.

Supplemental Response:

See CONFIDENTIAL Revised Exhibit 1-13 for the number of complaints to AirVoice from Lifeline customers beginning at the time of new ownership (i.e. 1/1/22) through 2023, for the categories requested.

Response prepared by: Octavia Clanton, Compliance Associate

**SUPPLEMENTAL RESPONSES TO FIRST SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

Revised Exhibit 1-3

Updated Financials

CONFIDENTIAL IN ENTIRETY

**SUPPLEMENTAL RESPONSES TO FIRST SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

Revised Exhibit 1-13

Updated Complaint Information

CONFIDENTIAL IN ENTIRETY

**SUPPLEMENTAL RESPONSES TO SECOND SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

D.T.C. 2-14 Explain whether the FCC, any state commission, or any government agency has rendered or entered a finding, conviction (including plea agreements), or civil judgment against AirVoice, its executives or senior managers, or any of its affiliates or their executives or senior managers, during the last ten years. Provide a copy of any such findings, consent decrees, convictions, plea agreements, or civil judgments.

Supplemental Response:

In addition to the information provided in the Company's initial response to 2-14, AirVoice identifies the following instance:

Air Voice entered into a Consent Decree with the FCC's Enforcement Bureau on February 28, 2024 to resolve and terminate its investigation into whether Air Voice failed to provide Lifeline services to all qualifying low-income consumers in accord with FCC rules (see FCC DA 24-175) due to a system error, which has since been corrected, that prevented applicants for signing up for Lifeline without also enrolling in EBB/ACP. To settle the matter, Air Voice agreed to pay a \$150,000 civil penalty to the United States Treasury and to implement enhanced compliance measures.

Response prepared by: Octavia Clanton, Compliance Associate

**SUPPLEMENTAL RESPONSES TO SECOND SET OF INFORMATION REQUESTS
BY THE DEPARTMENT OF TELECOMMUNICATIONS AND
CABLE TO AIRVOICE WIRELESS, LLC
D.T.C. 22-2**

April 19, 2024

D.T.C. 2-20 Refer to Exhibit 1-13 and provide:

- A. The geographies and service types (Lifeline only, Lifeline and ACP, ACP only, others) included in the complaints table.
- B. A definition for each type of complaint category recorded.
- C. AirVoice's procedure for registering complaints as tabulated in Exhibit 1-13.
- D. AirVoice's procedures for resolving complaints, including escalation to government agencies.

Supplemental Response:

- A. Revised Exhibit 1-13 includes Lifeline and/or ACP complaints nationwide.**
- B. The previous Exhibit 1-13 has been replaced and Revised Exhibit 1-13 provides complaints by the categories originally requested.**
- C. AirVoice tracks complaints received from government or similar agencies, i.e. FCC/OAG, USAC, state PUCs, and BBB.**
- D. AirVoice seeks to resolve customer issues as quickly and satisfactorily as possible. Depending on the issue, a complaint is addressed within 1-7 business days (the longer timeframe would be related to operations like delivery of a package which may still be in transit). Very few customer service issues result in escalation to management or government agencies; about 3-5% are escalated to upper level customer service reps for resolution, and only about 1% or less continue on to the compliance department. AirVoice does not generally escalate to government agencies, aside from directing applicants to contact the National Verifier if the issue is related to eligibility which is outside of AirVoice's control.**

Response prepared by: Octavia Clanton, Compliance Associate