

Application of TAG Mobile, LLC for )  
Designation as an Eligible Telecommunications )  
Carrier in Massachusetts for the Limited )  
Purpose of Offering Wireless Lifeline and Link-Up )  
Service to Qualified Households )

D.T.C. Case No. 11-8

**D.T.C. 2-1 Certify the accuracy of TAG's responses to the Department's First Set of Information Requests. Provide updated answers where necessary.**

Response: Updated information for TAG Mobile's responses to the Department's First Set of Information Requests is included as Updated/Supplemental (hereinafter referred to as "Supplemental") Information Responses and are filed separately herewith. All other First Set responses that have not been updated or supplemented remain unchanged. Certification of the accuracy of these unchanged prior responses is included as Exh. DTC-TAG 2-1.

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**D.T.C. 2-2 Provide TAG's financial statements for the last three years.**

Response: As a newer telecommunications company, TAG Mobile LLC does not have three years of revenue history. Audited financial statements for the partial year 2010 and the full year 2011 are attached hereto as Exh. DTC-TAG 2-2. Audited financial statements for calendar 2012 are not yet available. As the information in the Exh. DTC-TAG 2-2 financial statements are competitively sensitive and proprietary, they are furnished separately and are subject to a motion for protective order, filed herewith.

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**D.T.C. 2-3 Refer to TAG's response in D.T.C. 1-38 b. Provide the supplemental response TAG indicated it was preparing.**

Response: Supplemental information is or will be provided in TAG Mobile's response to D.T.C. 2-1 and Exh. DTC-TAG 1-38b-Supp.

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**D.T.C. 2-4 Refer to the Petition at page 33, in which TAG states that it will comply with the reporting requirements contained in 47 C.F.R. § 54.209(a)(4) to annually report the number of complaints per 1,000 lines received by the FCC, the Better Business Bureau, and this Department. State whether TAG will maintain its own customer complaint data, and include its results in this reporting.**

Response: TAG Mobile currently maintains its own customer complaint data and does include it in such reporting.

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**D.T.C. 2-5 Refer to the Supplemental Petition at page 5. Provide a detailed description of TAG's "Wireless Landline Replacement product."**

Response: Please refer to the Wireless Landline Replacement Product manual attached hereto as Exh. DTC-TAG 2-5. This will be fully branded as coming from TAG Mobile prior to the Massachusetts launch.

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**D.T.C. 2-6 Provide the number of wireless and Lifeline customers that TAG serves nationwide.**

Response: Approximately 285,000 Lifeline customers and a small number (less than 100) of non-Lifeline wireless customers. Please note that TAG Mobile is preparing a marketing push to secure substantial additional prepaid wireless Customers.

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**D.T.C. 2-7 Refer to TAG’s Compliance Plan at page 18:**

- a. Provide information on the nature and business model of CGM, LLC.**
- b. Describe the database established by CGM, LLC including the customer information stored, date of inception, list of carriers currently participating in the database, whether the database is state-specific or national, and whether any Massachusetts ETC’s presently participate in the CGM, LLC database.**
- c. Provide the status of the application referenced in TAG’s Compliance Plan that is intended to allow TAG to interface with CGM, LLC’s pooled database by July 2012.**

Response: a. CGM, LLC (“CGM”) is a vendor of TAG Mobile and as such TAG Mobile has no management interest or oversight in CGM’s business operations, nor is TAG Mobile privy to details concerning the nature of CGM’s business or its business model.

b. To the best of TAG Mobile’s belief and understanding, CGM’s database is national in scope to the extent that it is comprised of subscriber information for all CGM clients. Outside of this, TAG Mobile does not have any specific knowledge as to the nature of information stored, date of inception of CGM’s database or any other confidential and proprietary information of CGM which would include participating clients and/or whether or not any of such clients are Massachusetts ETCs. That being said, TAG Mobile is aware that to a certain extent this information has been provided by CGM to the FCC and, as a result, the FCC deems CGM’s database to be a reasonable interim solution until such time as the FCC’s Accountability Database is available. As a result, the FCC’s approval of TAG Mobile’s Compliance Plan was contingent upon TAG Mobile’s participation in and use of the CGM duplicate database until such time as the FCC’s Accountability Database becomes available.

c. TAG Mobile has implemented and currently utilizes the API contemplated in its Compliance Plan to access the CGM duplicate database in real time when initially entering applicant information into its system. This allows TAG Mobile to check for duplicative Lifeline service prior to accepting and/or processing an application for Lifeline service with TAG Mobile.

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**D.T.C. 2-8 Refer to TAG's Compliance Plan at page 18. Describe all "social networking media" through which TAG intends to disseminate marketing materials. Include in Tag's response whether customers will be able to enroll in its Lifeline service via such social networking media.**

Response: At this time TAG Mobile does not intend to disseminate marketing materials, Lifeline or otherwise, through any social networking media aside from its Internet webpage ([www.tagmobile.com](http://www.tagmobile.com)). This terminology was included in TAG Mobile's Compliance Plan to indicate that, should TAG Mobile intend to utilize such social networking media in the future, TAG Mobile's commitment to include the required disclosures would apply to all such media channels, as well as those currently utilized.

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**D.T.C. 2-9 Refer to TAG's Compliance Plan at page 18. Provide a detailed description of TAG's participation in the In-Depth Validation ("IDV") process with the FCC and the Universal Service Administrative Company ("USAC"). TAG's response should include any information regarding the number of duplicates by state that were identified as a result of the IDV process.**

Response: Thus far TAG has participated in IDV's for Phases 3, 4, 5, 7, 8 & 9 of USAC's Interim Dispute Resolution Process ("IDRP"), which is ongoing. Details of the duplicate results for TAG of each phase of the IDRP in which the Company participated are as follows:

Phase 3 – Only included top 10 ETCs in Phase 3 designated states

Initiated August 2011

Concluded January 2012

For IDV month of June, 2011

SAC 409015 – Arkansas – Duplicates identified for de-enrollment: 3,766

SAC 279032 – Louisiana – Duplicates identified for de-enrollment: 7,149

Phase 4 – Only included top 10 ETCs in Phase 4 designated states

Initiated February 2012

Concluded July 2012

For IDV month of December 2011

SAC 429016\* – Missouri – Duplicates Identified for de-enrollment: 6,199

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\* Important note: The referenced Phase 4 SAC belongs to Unity Telecom, LLC f/k/a dPi Teleconnect, LLC, but since TAG Mobile provides administrative and provisioning services for Unity in Missouri, TAG Mobile responded on Unity's behalf and as such is providing the results of that IDV here.

Phase 5 –Included all ETCs in Phase 5 designated states

Initiated April 2012

Concluded August 2012

For IDV month of February, 2012

SAC 279032 – Louisiana – Duplicates identified for de-enrollment: 19,373

Phase 7 – Includes all ETCs in Phase 7 designated states

Initiated August 2012

Not yet concluded

For IDV month of June, 2012

SAC 189020 – Maryland – Duplicates identified for de-enrollment: Not yet available

SAC 209026 – West Virginia – Duplicates identified for de-enrollment: Not Yet Available

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Phase 8 – Includes all ETCs in Phase 8 designated states

Initiated September 2012

Not yet concluded

For IDV month of July, 2012

SAC 269034 – Kentucky – Duplicates identified for de-enrollment: Not yet available

Phase 9 – Includes all ETC's in Phase 9 designated states

Initiated October 2012

Not yet concluded

For IDV month of August, 2012

SAC 409015 – Arkansas – Duplicates identified for de-enrollment: Not yet available

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**D.T.C. 2-10 Refer to TAG's Compliance Plan at page 3, in which TAG states that it "purchases Verizon Wireless service through Coast 2 Coast." Provide detailed information about the nature of services rendered under TAG's contract with Coast 2 Coast.**

Response: This information is included in TAG Mobile's updated response to D.T.C. 1-24 of the Department's First Set of Information Requests (i.e., now DTC-TAG 1-24-Supp).

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**D.T.C. 2-11 Refer to TAG's Compliance Plan at page 21, in which TAG states that it will "[m]ake available state-specific subscriber data, including the names and addresses of its Lifeline customers, to USAC and to each state public utilities commission where TAG operates for the purpose of determining whether an existing Lifeline customer receives Lifeline service from another carrier." Indicate whether TAG will also provide the date of enrollment for each subscriber, and the qualifying program or income eligibility through which the subscriber was enrolled. Also, describe the method and frequency TAG intends to employ in disseminating this information.**

Response: TAG has been working with USAC and has agreed to provide state-specific subscriber data to USAC and, as applicable, state public utilities commissions to the extent requested by USAC using the methods and frequencies specified by USAC. To date, USAC has not requested that Lifeline providers furnish date of enrollment information or specify the subscriber's qualifying program or income eligibility through which the subscriber was enrolled. To the extent USAC requests additional information from TAG and other Lifeline providers, TAG anticipates meeting such requirements.

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**D.T.C. 2-12 Provide a three-year breakdown of TAG's revenues under the following categories:**

- a. Replenishment airtime minutes;**
- b. Pre-paid wireless service to non-Lifeline customers;**
- c. Wholesale airtime to smaller and/or regional wireless service providers, including ETCs for traditional pre-paid service and Lifeline service; and**
- d. Other ancillary services.**

Response: As a newer telecommunications (Wireless) company, TAG Mobile LLC does not have three years of revenue history. As the information in the Exh. DTC-TAG 2-2 financial statements are competitively sensitive and proprietary, they are furnished separately and are subject to a motion for protective order, filed herewith. With respect to the four categories identified above, TAG Mobile does not break down its revenue in the manner requested. TAG Mobile can state that revenues in category b. (non-Lifeline prepaid) is currently very small. See Response to DTC-TAG 2-6 supra.

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**D.T.C. 2-13 Refer to the Compliance Plan at page 24, in which TAG states that it “has access to other financial resources including from its well-established parent company Amvensys Capital Group, LLC.” Provide a detailed description of all credit facilities and obligations between TAG and Amvensys Capital Group, LLC. Include in TAG’s response, any credit facility secured by Amvensys Capital Group, LLC on behalf of TAG with a third party lender.**

Response: TAG Mobile currently does not have a credit facility for borrowing TAG Mobile operating capital nor is there a standing inter-company credit facility. However, TAG Mobile’s continued performance and strong financial position evidenced by its audited financial statements position it to be able to access capital on standard market terms with a number of large lenders. TAG Mobile also leverages shared resources from a parent company, Amvensys Capital Group, LLC (“ACG”), which is a diversified holding company with approximately 10 operating company subsidiaries. ACG and its portfolio companies can and, from time to time, do pledge their respective credit to support the needs of affiliates in appropriate circumstances. See Exh. DTC-TAG 1-3b-Supp (organizational chart).

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**D.T.C. 2-14 Refer to Exhibit D of the Supplemental Petition. Provide copies of updated marketing materials reflecting the plans, terms, and conditions which TAG proposes to market in Massachusetts.**

Response: This information is included in TAG Mobile's updated response to DTC-TAG Exh. 1-37-Supp of the Department's First Set of Information Requests.

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**D.T.C. 2-15 Certify that TAG will comply with the annual audit and reporting requirements outlined in *TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers, D.T.C. 09-9, Order at 16 (June 30, 2010)*; and *TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers, D.T.C. 10-6, Order at 4 (Oct. 19, 2010)*.**

Response: TAG Mobile will so certify, except to the extent that the Department changes the audit and reporting requirements applicable to Massachusetts ETCs.

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**D.T.C. 2-16 State whether TAG agrees to notify the Department and request Department approval before modifying its Massachusetts Lifeline service offerings.**

Response: TAG Mobile will agree to comply with all Department notice and/or approval requirements that are imposed on all similarly situated Lifeline carriers that comport with applicable federal and state laws. In addition, in order to help keep the Department informed of ETC industry changes in the Commonwealth, TAG Mobile agrees to provide prompt notice of any material changes made to its Massachusetts Lifeline offerings.

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**D.T.C. 2-17 Certify that TAG will comply with the mass migration requirements adopted in *Proceeding by the Dept. of Telecomm'ns. & Energy on its own Motion to Develop Requirements for Mass Migrations of Telecomm'ns Service End-Users*, D.T.C. 02-28, Order at 12 (Aug. 7, 2002).**

Response: TAG Mobile is prepared to implement reasonable customer protection measures in the event of market exit or mass migration, and will certify to compliance with Department requirements applicable to all ETCs that comport with applicable federal and state law. Nevertheless, TAG Mobile is unaware that the Docket 02-28 requirements apply to all ETCs, given that the requirements apply by their terms only to competitive local exchange carriers (and not to wireless carriers) and TAG Mobile is unaware of references to these requirements being applied to ETCs in the recent decisions such as Virgin Mobile and T-Mobile. TAG Mobile requests clarification from the Department regarding applicable law on this point.

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