

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. 1-1 Identify by name and title, each executive officer and senior manager of TAG Mobile.

Response: Frank Del Col, President and CEO
Jon Taylor, Treasurer
Susan Do, Assistant Secretary
Charles Clack, Director of Operations
Joel Johnson, Director of Product Management
Douglas Riewski, Director of Sales and Marketing

Supplemental/Updated Response (hereinafter "Supplemental Response"):

Frank Del Col, President and CEO
Terry Pavek, CFO
Greg Blair, Secretary
Charles Clack, Director of Operations
Joel Johnson, Director of Product Management
Esau Neri, Vice President of Sales and Marketing

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-2 Describe with specificity TAG Mobile's affiliation with dPi Teleconnect, LLC, including, but not limited to, whether TAG Mobile shares board members, fiduciaries, executive officers, or senior management with dPi Teleconnect, LLC.

Response: TAG Mobile and dPi Teleconnect are sister companies, both of which are wholly owned subsidiaries of AmVensys Capital Group, LLC ("AmVensys"). Both entities share the executive officers holding the positions of Treasurer and Assistant Secretary, Jon Taylor and Susan Do respectively. Jon Taylor and Susan Do hold these same positions at the parent level as officers of AmVensys as well as holding these positions for all AmVensys subsidiaries that have not as yet elected their own officers to these positions. In this respect, these positions have no management oversight or authority in directing the day to day operations of either TAG Mobile or dPi Teleconnect. In all other respects, TAG Mobile and dPi Teleconnect do not share executive officers or senior management.

Supplemental Response: Please note, all references made herein to dPi Teleconnect, LLC should now be updated to reflect the new name of the company, Unity Telecom, LLC ("Unity"). This change has been made with the Secretary of State of Delaware, which is Unity's state of domesticity, and has been updated with the relevant Secretaries of State for all Unity's foreign qualifications as well as the relevant State PUCs. Unless otherwise noted, the content of all other responses referring to dPi Teleconnect, LLC remain unchanged.

TAG Mobile and Unity are sister companies, both of which are wholly owned subsidiaries of AmVensys Capital Group, LLC ("AmVensys"). Both entities share the executive officers holding the positions of CFO and Secretary, Terry Pavek and Greg Blair, respectively. Terry Pavek holds the office of CFO for both Unity and TAG Mobile, and is responsible for the oversight of the financial operations of both entities. Greg Blair holds the positions of Senior Vice President, General Counsel and Secretary at the parent level and holds the position of Secretary for all AmVensys subsidiaries. Neither of these positions have management oversight or authority in directing the day to day operations of either TAG Mobile or Unity. In all other respects, TAG Mobile and Unity do not share executive officers or senior management.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-3 Provide a complete and detailed description of the corporate ownership structure of TAG Mobile. Also:

Response: TAG Mobile is a wholly owned subsidiary of AmVensys.

a. Identify other telecommunications businesses that TAG Mobile's owners have interests in whether an ETC, CLEC, ILEC, wireless provider, or cable provider.

Response: dPi Teleconnect, LLC and Voicecom Telecommunications, LLC d/b/a Intelliverse are also wholly owned AmVensys subsidiaries.

b. Additionally, provide a complete and detailed list of all of TAG Mobile's affiliates and provide all of the names under which each does business.

Response: Please see the Organization chart attached hereto as Exh. DTC-TAG 1-3b.

Supplemental Response: Please see the updated Organization chart attached hereto as Exh. DTC-TAG 1-3b-Supp. Note that several companies listed on Exh. DTC-TAG 1-3b-Supp are companies in which TAG Mobile's parent has made investments but exercises no management authority or control (e.g., Simplify 360, Inc.).

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D.T.C. 1-4 Identify all states where TAG Mobile or any of its affiliates has been designated as an ETC. For each, indicate whether that designation is limited, and if so how, including any specific requirements imposed on or volunteered by TAG Mobile or any affiliate. Provide complete and detailed documentation describing any such limitations or requirements.

Response: Please see the spreadsheet attached hereto as Exh. DTC-TAG 1-4.

TAG Mobile and dPi Teleconnect are the only AmVensys owned entities designated as ETCs. All of the ETC designations for both TAG Mobile and dPi Teleconnect solely request low income support for the provision of Lifeline and Link-Up service. None of TAG Mobile or dPi Teleconnect's ETC designations contain limitations or specific requirements outside of those which are unique to the applicable jurisdictions and apply uniformly to all ETCs designated in such jurisdictions.

Supplemental Response: Please see the updated spreadsheet attached hereto as Exh. DTC-TAG 1-4-Supp.

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D.T.C. 1-5 Identify all states that have denied a petition for ETC designation from TAG Mobile or any of its affiliates. Provide complete and detailed documentation for each denial.

Response: No petitions for ETC designation by TAG Mobile have been denied. dPi Teleconnect's application for ETC designation in Tennessee was denied with permission to re-file. dPi Teleconnect filed an application for wireless and wireless ETC designation in Tennessee. The Tennessee Regulatory Authority (TRA) directed the company to re-file its application for Wireline only (that application is currently pending), and to file with the FCC for Wireless ETC designation. No enforcement actions have been filed against the company, nor have any company officials been charged with legal violations relating to telecommunications matters.

Supplemental Response: No petitions for ETC designation by TAG Mobile have been denied. Unity's application for ETC designation in Tennessee was denied with permission to re-file. Unity filed an application for wireline and wireless ETC designation in Tennessee. The Tennessee Regulatory Authority (TRA) directed the company to re-file its application for Wireline only, and to file with the FCC for Wireless ETC designation. Unity's application for ETC Designation has since been withdrawn so that the company could focus on its rebranding efforts and in filing its Compliance Plan with the FCC. Unity's application for ETC Designation in Tennessee will be refilled upon completion of the rebranding and approval of its Compliance Plan. No enforcement actions have been filed against the company, nor have any company officials been charged with legal violations relating to telecommunications matters.

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D.T.C. 1-7 Identify all states where TAG Mobile or any of its affiliates has a petition currently pending for ETC designation, and describe the status of each such petition.

Response: Please refer to Exh. DTC-TAG 1-4.

Supplemental Response: Please refer to updated Exh. DTC-TAG 1-4-Supp.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-12 Identify any and all ongoing litigation involving TAG Mobile or any of its affiliates in any jurisdiction. Provide a docket number and summary of the litigation for each matter identified.

Response: TAG Mobile does not have any current or pending litigation in any jurisdiction. dPi Teleconnect is an active CLEC with extensive regulatory and court litigation in numerous states. With respect to dPi Teleconnect's ongoing litigation, please see the litigation summary spreadsheet attached hereto as Exh. DTC-TAG 1-12. As the status descriptions include confidential information, the exhibit should be kept confidential and a Motion for Confidential Treatment is submitted herewith. To the best of our knowledge and belief, there is no other current or pending litigation involving any other TAG Mobile affiliated entity.

Supplemental Response: TAG Mobile does not have any current or pending litigation in any jurisdiction. Since the filing of the original response to the data request, Unity, f/k/a dPi Teleconnect, LLC has settled all outstanding regulatory and court litigation matters effective April 12, 2012. To the best of our knowledge and belief, there is no other current or pending litigation involving any other TAG Mobile affiliated entity.

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**D.T.C. 1-14 Provide a detailed description of each Lifeline service package TAG
Mobile intends to offer in Massachusetts, including pricing.**

Response: Please see the Summary Rate Plan document attached hereto as Exh.
DTC-TAG 1-14.

Supplemental Response: Please see the updated spreadsheet attached hereto as Exh. DTC-
TAG 1-14-Supp.

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D.T.C. 1-15 Identify the rates (or charges) for each service offered by TAG Mobile under 47 U.S.C. § 254(c) and identified in 47 C.F.R. § 54.101(a).

Response: The services identified in 47 C.F.R. § 54.101(a) are included at no additional cost to the consumer, and are built in to all of the service plans offered by TAG Mobile. For information on rates and/or charges related to these services, please refer to Exh. DTC-TAG 1-14.

Supplemental Response: Referenced Exhibit has been updated as Exh. DTC-TAG 1-14-Supp.

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D.T.C. 1-16 Will TAG Mobile provide non-Lifeline service in Massachusetts? If so, provide a detailed description of the non-Lifeline service packages TAG Mobile intends to offer, including pricing.

Response: TAG Mobile intends to provide pre-paid services, in addition to its Lifeline service, in Massachusetts as described in Exh. DTC-TAG 1-14.

Supplemental Response: Referenced Exhibit has been updated as Exh. DTC-TAG 1-14-Supp.

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D.T.C. 1-17 For all Lifeline and non-Lifeline services that TAG Mobile intends to offer in Massachusetts, describe the prepaid and postpaid options available to consumers.

Response: All Lifeline services provided by TAG Mobile in Massachusetts are offered at no charge to consumers. All other services provided by TAG Mobile, as described in Exh. DTC-TAG 1-14, are provided on a pre-paid basis. Currently TAG Mobile does not offer any post-paid service options, nor does it have plans to offer post-paid service options in the foreseeable future.

Supplemental Response: Referenced Exhibit has been updated as Exh. DTC-TAG 1-14-Supp.

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D.T.C. 1-18 For each of TAG Mobile's Lifeline service packages:

- a. Is a text messaging option included? If so, describe with specificity, and indicate the source of support for this service.**

Response: Text messaging is available with TAG Mobile's Lifeline service package, and decrements minutes at a rate of 3 texts, either sent or received, to 1 minute of use.

- a. Are any data services included? If so, describe with specificity, and indicate the source of support for this service.**

Response: Data services are not included, nor are data services available, as part of TAG Mobile's Lifeline service package.

- b. Do Lifeline customer communications with TAG Mobile via either phone call or text message count against the Lifeline customer's minutes or, if applicable, allotted text messages? If so, at what rates?**

Response: Customer communications with TAG Mobile, regardless of whether such communication is initiated by the Company or by the customer, and whether such communication is made via text message or phone call, do not decrement the Lifeline customer's available minutes of use.

- c. Are minutes (including free minutes) carried over from month-to-month? Please describe.**

Response: Neither TAG Mobile's Lifeline service plan, nor its non-Lifeline service plans available in Massachusetts provide for roll-over of unused minutes.

Supplemental Response: Text messaging is available with TAG Mobile's Lifeline service package, and decrements minutes at a rate of 1 text, either sent or received, to 1 minute of use.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-19 Confirm that TAG Mobile seeks ETC designation for Link-Up as well as Lifeline support. Additionally, please respond to the following:

Response: TAG Mobile hereby confirms that it does seek Link-Up support, as well as Lifeline support, in its Petition for ETC designation in Massachusetts.

- a. In any other state where TAG Mobile or any of its affiliates has been designated as an ETC to receive support for wireless services, indicate whether that designation includes Link-Up support or whether Link-Up support was denied.**

Response: In all states wherein TAG Mobile has received ETC designation, such designation includes Link-Up support. To the best of our knowledge and belief, in all states wherein dPi Teleconnect has received ETC designation, such designation also includes Link-Up support.

- b. Describe with specificity why granting TAG Mobile ETC designation for Link-Up support is in the public interest and provide further legal support for TAG Mobile's claim that "a combination carrier like TAG Mobile, is required to provide Lifeline and Link-Up." P etition at 18.**

Response: Granting TAG Mobile ETC designation for Link-Up support is in the public interest because it provides Low Income consumers access to Lifeline supported services with no out of pocket expense. In the absence of Link-Up support, such out of pocket expenses would typically preclude Low Income consumers from being able to afford the establishment of Lifeline service, regardless of that service being provided at no cost to qualifying consumers. Additionally, Link-Up support contributes to increased competitive choice by enabling potential competitors to offset costs associated with entry into a new market, thereby supporting the goals of universal service with respect to competitive neutrality.

In support of TAG Mobile's claim that it is required to provide Link-Up Service as part of obligation to provide the supported services, TAG Mobile relies upon the specific language of 47 CFR 54.411 which states in part "...the term "Link Up" shall describe the following assistance program for qualifying low-income consumers, *which an eligible telecommunications carrier shall offer* as part of its obligation set forth in 47 CFR 54.101(a)(9) and 54.101(b)" (emphasis added). In further support of this contention, TAG Mobile asserts that in order to be designated as an ETC without the obligation of providing Link-Up service, ETC's are required to receive an order of forbearance from the FCC waiving the requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own facilities.

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- c. Describe with specificity the costs incurred by TAG Mobile to activate a Lifeline customer.**

Response: Please see the cost analysis attached hereto as Exh. DTC-TAG 1-19c.

- d. Confirm that TAG Mobile will waive the activation charge to Lifeline customers. See Petition at 28. Identify the activation charge imposed on non- Lifeline customers by TAG Mobile.**

Response: TAG Mobile hereby confirms that it will waive any activation charges remaining after application of the Link-Up credit for eligible Lifeline consumers. TAG Mobile's activation charge for non-Lifeline customers is \$60.

Supplemental Response: TAG Mobile has eliminated its activation charge for both Lifeline and non-Lifeline customers in an effort to remain competitive in the marketplace.

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D.T.C. 1-24 TAG Mobile asserts that through its “own facilities and its underlying 911 carrier’s network, TAG Mobile is able to provide its customers with access to emergency services...” Petition at 11.

- a. Identify each carrier from which TAG Mobile intends to obtain facilities in providing service to its Massachusetts customers.**

Response: TAG Mobile currently utilizes both Sprint and Verizon Wireless carrier networks.

- b. For each such carrier, indicate whether any agreement between TAG Mobile and that carrier contains specific provisions related to functionality in emergency situations relevant to Massachusetts. Describe any such provisions and provide copies of all such agreements.**

Response: TAG Mobile’s underlying carrier agreements do not contain specific provisions related to functionality in emergency situations. Further, TAG Mobile’s underlying carrier agreements contain confidentiality language and restrictions which prevent us from providing copies of the agreements in any forum which may make them available in a public forum. TAG Mobile will provide copies of its underlying carrier agreements to the Department. Subject to a Motion for Confidential Treatment, TAG Mobile will file a supplemental response and accompanying motion when it has obtained copies for production.

Supplemental Response: While the above response remains unchanged, carrier agreements indicated in TAG Mobile’s original response are provided supplementally as Exh. DTC-TAG 1-24-Supp (Sprint) and Exh. DTC-TAG 1-24-Supp (VZ). The agreements are competitively sensitive, and a motion for confidential treatment is filed herewith.

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D.T.C. 1-27 Describe with specificity whether TAG Mobile has any unique advantages, characteristics, or features to its proposed service offerings as compared to the service offerings of the incumbent local exchange carrier (i.e., Verizon) and other Massachusetts ETCs (e.g., RCN of Massachusetts, Taconic Telephone Corporation, Virgin Mobile, and TracFone) in the designated area.

Response: TAG Mobile will have a unique advantage over the ILEC landline carriers in that TAG Mobile customers can take their service with them wherever they go. The service offering comes with texting, voice mail, and calling features, and comes with domestic Long Distance as well. In regards to TracFone and Virgin Mobile, TAG Mobile believes that it offers comparable plans to customers and that customers benefit from the presence of competition for telecommunication services. In addition, TAG Mobile will pay E-911 fees on behalf of its customers.

Supplemental Response: As a point of clarification to the prior response, TAG Mobile clarifies that while text messaging is available, texting is not an included component of the Lifeline Service offering. Text messaging decrements voice minutes at a ratio of 1 text, either sent or received to 1 minute of use.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-28 Provide complete and detailed documentation of the certification and verification procedures TAG Mobile intends to implement in Massachusetts, including sample certification and verification forms. Verify that TAG Mobile is willing to 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 With regard to the provision of Lifeline/Link-Up service, TAG Mobile uses a four-level approach to verify Lifeline eligibility and ensure one discount per household as follows:

- First step is at the point of sale (POS) where the customer address is loaded into the POS electronic Agent portal. At this point we dip into the USPS database to ensure that the address is a valid and deliverable address. There is a second simultaneous dip into our internal customer database and finally a third dip into our ^{3rd} party verification company's (CGM, LLC, hereinafter referred to as CGM) USAC database of all 497 filings (which checks both wireline and wireless for any duplicates).
- Second step is all Lifeline/Link-Up applicant information that passes the first step is then electronically submitted into the compliancy queue. This creates a pending customer account with the original Lifeline form attached to each customer account order. This account is then audited by a trained Lifeline coordinator, who contacts the customer to verify the information included on the form. The order is checked for any potential fraud (duplicate or missing signatures, modified forms, another duplicate name/address check, incorrect form information)
- The third step is a QC audit check where senior level QC compliancy agents take random samples of all Lifeline/Link-Up applications to spot check auditor accuracy and quality. All Lifeline Auditors and audits are required to consistently keep a 98% accuracy rating for all Agents and orders.
- The Fourth step is performed prior to filing form 497 for USAC reimbursement. All accounts are uploaded to CGM for an additional check of all addresses against other cooperating ETC's for duplications and any other invalid address issues.

All of the above processes and procedures are electronically tracked and reported in real time.

Please also see application document attached hereto as Exh. DTC-TAG 1-28.

Supplemental Response: With regard to the provision of Lifeline service, TAG Mobile

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uses a four-level approach to verify Lifeline eligibility and ensure one discount per household as follows:

- First step is at the point of sale (POS) where the customer address is loaded into the POS electronic Agent portal. At this point we dip into the USPS database to ensure that the address is a valid and deliverable address. There is a second simultaneous dip into our internal customer database and finally a third dip into our ^{3rd} party verification company's (CGM, LLC, hereinafter referred to as CGM) USAC database of all 497 filings (which checks both wireline and wireless for any duplicates). Also at the POS, in accordance with the revised rules promulgated as part of the FCC Lifeline Reform Order (FCC 12-11), Agents will visually inspect proof of eligibility documentation provided by applicants to verify eligibility for the Lifeline program. The form and validity of such documentation is recorded on the Lifeline application as per the Record Keeping Requirements posted by USAC. (Link provided: <http://www.usac.org/li/telecom-carriers/step06/record-keeping-requirements.aspx>)
- Second step is all Lifeline applicant information that passes the first step is then electronically submitted into the Lifeline Eligibility queue. This creates a pending customer account with the original Lifeline form attached to each customer account order. This account is then audited by a trained Lifeline Eligibility Auditor, who contacts the customer to verify the information included on the form. The order is checked for any potential fraud (duplicate or missing signatures, modified forms, missing eligibility documentation information, another duplicate name/address check, incorrect form information)
- The third step is a QC audit check where senior level QC Lifeline Eligibility agents take random samples of all Lifeline applications to spot check auditor accuracy and quality. All Lifeline Eligibility Auditors and audits are required to consistently keep a 98% accuracy rating for all Agents and orders.
- The Fourth step is performed prior to filing form 497 for USAC reimbursement. All accounts are uploaded to CGM for an additional check of all addresses against other cooperating ETC's for duplications and any other invalid address issues.

All of the above processes and procedures are electronically tracked and reported in real time.

Please also see updated application document attached hereto as Exh. DTC-TAG 1-28-Supp.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-29 For each Lifeline service package that TAG Mobile proposes to offer in Massachusetts, provide detailed calculations showing how carrier support and each Tier of USF support directly supports the minutes provided.

Response:

TAG Mobile will give free minutes to lifeline customers equal to the full lifeline subsidy in Massachusetts. The full subsidy will be applied to all of TAG Mobiles lifeline service packages. The subsidy amount is equal to:

Tier 1: \$6.39 (Federal Support)

Tier 2: \$1.75 (Federal Support)

Tier 3: \$3.50 (TAG Mobile Support)

Tier 3: \$1.75 (Federal Support Match of Company Tier 3)

The total subsidy TAG Mobile will give its lifeline customers is \$13.39.

TAG Mobile will seek \$9.89 in federal subsidy for each lifeline customer.

Supplemental Response: TAG Mobile will give free minutes to Lifeline customers equal to the full Lifeline subsidy in Massachusetts plus a company contribution. The full subsidy will be applied to TAG Mobile's Lifeline specific service package and is equal to the federal Lifeline benefit of \$9.25 plus a company contribution of \$3.50 for a total benefit of \$12.75. The Lifeline discount applicable to TAG Mobile's non-Lifeline specific, pre-paid Service offerings is equal to the federal Lifeline benefit of \$9.25.

TAG Mobile will seek \$9.25 in federal subsidy for each lifeline customer.

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D.T.C. 1-30 TAG Mobile states that it “operates as a facilities-based Mobile Virtual Network Operator (“MVNO”), with a variety of facilities owned by TAG Mobile and/or co-owned with wireline affiliate, dPi Teleconnect, LLC.”
Petition at 13. TAG Mobile states these facilities are located in California, Texas, and Florida. *Id.*

- a. Describe with specificity the services to be provided by each of these facilities [as set forth in 47 C.F.R. § 54.101] and the charges and fees associated with each service to be imposed on Lifeline customers in Massachusetts.**

Response: Please see the spreadsheet attached hereto as Exh. DTC-TAG 1-30a.

- b. Define the term “Mobile Virtual Network Operator.” Clarify whether the FCC has designated TAG Mobile a MVNO.**

Response: A Mobile Virtual Network Operator (MVNO) is defined as a company that provides mobile phone services but does not have its own licensed frequency allocation of radio spectrum, nor does it necessarily have all of the infrastructure required to provide mobile telephone service. TAG Mobile has not been specifically designated by the FCC as an MVNO.

- c. Describe with specificity TAG Mobile’s co-ownership arrangement with dPi Teleconnect, LLC with respect to the facilities identified. Describe with specificity TAG Mobile’s responsibility to maintain or manage these co-owned facilities.**

Response: TAG Mobile is researching this information and will supplement this response when available.

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- d. **Describe with specificity any infrastructure owned or co-owned by TAG Mobile in Massachusetts, including cell towers, transport facilities, loops, tandem switches, end offices, local switches, and spectrum. Identify the location of any such facilities in Massachusetts.**

Response: TAG Mobile does not own or co-own any infrastructure in Massachusetts.

- e. **Describe with specificity any infrastructure owned or co-owned by TAG Mobile in other states (including cell towers, transport facilities, loops, tandem switches, end offices, local switches, and spectrum) that will be used to provide Lifeline and Link-Up services to Massachusetts residents not identified in the Petition. Identify the location of any such facilities.**

Response: TAG Mobile does not own or co-own any infrastructure in other states.

Supplemental Response: Since TAG Mobile has received approval of its Compliance Plan filed with the FCC on August 8, 2012, TAG Mobile has received forbearance from the facilities requirement for providing Lifeline service. As a result, the prior responses are now moot.

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D.T.C. 1-33 Explain TAG Mobile's deactivation and non-usage policies. Additionally:

Response: Please see TAG Mobile's Non-Usage policy document attached hereto as Exh. DTC-TAG 1-33.

a. Provide a detailed description of the reasons for which a Lifeline subscriber's account may be deactivated.

Response: A Lifeline subscriber's service may be deactivated in the event that the subscriber no longer meets the eligibility requirements for receiving the Lifeline discount and they do not choose to pay for continued service on a non-Lifeline basis. In addition, a Lifeline subscriber's service may be deactivated in the event the subscriber is identified as receiving duplicate Lifeline service with another provider and does not indicate that TAG Mobile is their preferred service provider as anticipated by the IDRPs initiative currently ongoing with the FCC and USAC.

b. If a Lifeline subscriber does not use the service for a notable period of time (e.g., 60 days), explain whether TAG Mobile collects USF support during the period it attempts to confirm continued usage and eligibility.

Response: Please refer to Exh. DTC-TAG 1-33.

Supplemental Response: In addition to the prior response related to reasons for which a Lifeline subscriber's account may be deactivated, TAG Mobile supplements its response to include deactivation of Lifeline subscriber accounts that have not been recertified pursuant to the revised rules of the FCC's Lifeline Reform Order (FCC 12-11)

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D.T.C. 1-36 Regarding the prepaid wireless Lifeline plan and plans to purchase additional airtime described on pages 26 and 27 of the Petition:

- a. Describe with specificity any additional charges, fees, or taxes that may apply for each plan listed. For each, describe how the fee will apply to the proposed Lifeline service offerings. Describe how these charges and fees differ from TAG Mobile's non-Lifeline service offerings.**

Response: For Replenishment minutes purchased via PIN Reload cards purchased at a retail location, sales tax may be imposed at the POS. This fee has no application to TAG Mobile's Lifeline service offerings. Further, additional airtime minutes purchased online, via telephone or in person at an authorized agent location wherein the additional minutes are purchased directly through TAG Mobile's Agent Portal, sales tax does not apply. No other additional charges, fees or taxes that will apply.

- b. For each plan listed, describe whether and how TAG Mobile will collect and remit the 911 surcharge for additional minutes purchased.**

Response: TAG Mobile's service plan pricing incorporates anticipated 911 & E911 fees. Remittance of the 911 and E911 fees is done via the tax billing software provided with the H2O software platform utilized for TAG Mobile's billing and reporting system.

- c. Explain whether TAG Mobile intends to notify the Department and receive Department approval before modifying its Massachusetts Lifeline service offerings.**

Response: TAG Mobile intends to notify the Department and receive Department approval before modifying its Massachusetts Lifeline service offerings in a manner that reduces the offerings. TAG Mobile reserves the right to enhance offerings without prior notice to or approval of the Department.

- d. Explain whether TAG Mobile intends to provide advance notice to Lifeline subscribers of changes in terms and conditions of service. See Exh. DTC-TAG D to the Petition, General Terms and Conditions of Service at 8. If so, explain whether subscribers will be afforded the opportunity to cancel service without penalty.**

Response: It is TAG Mobile's policy to notify its customers of any substantial changes to its terms and conditions of service, specifically including any changes that would affect any rights afforded to the customer therein, or any changes affecting a customer's service. Since TAG Mobile is a pre-paid service provider, cancellation of service is available at any time, for any reason, without penalty.

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- e. **Clarify whether the Customer Terms and Conditions presented in Exh. DTC-TAG D will be used by TAG Mobile in Massachusetts. If not, provide a copy of the Customer Terms and Conditions (i.e., service agreement, terms of service, general terms and conditions of service, etc.) to be used in Massachusetts.**

Response: The Agreement provided by way of Exhibit D to TAG Mobile's Petition for ETC designation in Massachusetts is the Agreement that will apply to those services anticipated to be provided in Massachusetts. Should there be any changes requested or recommended by the Department related to the provision of services in Massachusetts, TAG Mobile will comply with such request or recommendation.

Supplemental Response: The Service Agreement provided by way of Exhibit D to TAG Mobile's Petition for ETC designation in Massachusetts has been updated and is attached hereto as Exh. DTC-TAG 1-36e-Supp.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-37. Regarding Exh. DTC-TAG E ("Sample Advertising") to the Petition, explain whether this advertisement will be used in Massachusetts. Provide samples of advertising that will be used in Massachusetts. Also:

Response: With regard to the Sample Advertising included as an Exhibit to TAG Mobile's petition, TAG Mobile will use print advertising substantially similar to the Sample Advertising provided, the exception being that the advertising specific to Massachusetts will include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service.

Supplemental Response: With regard to the Sample Advertising included as an Exhibit to TAG Mobile's petition, such sample advertising has been updated and is attached hereto as Exh. DTC-TAG 1-37-Supp. TAG Mobile will use print advertising substantially similar to the Sample Advertising provided, the exception being that the advertising specific to Massachusetts will include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service.

a. Explain why the offer of free phone and free minutes every 30 days is limited to one year.

Response: Since eligibility for Lifeline service is required to be recertified and/or verified annually, renewal of TAG Mobile's Lifeline service is contingent upon the subscriber verifying their continued eligibility for the service on or about their service anniversary.

b. According to Exhibit E, additional minutes may be purchased, but will expire if not used within the designated time period. Explain why TAG Mobile believes it is in the public interest to offer to Lifeline customers packages with minutes that do not carry over.

Response: Tag Mobile's extra minutes policy has worked well for its customers, with minimal complaints. To be clear, the policy works as follows. Assume a customer has its regular minutes commencing on May 1 and desires to purchase extra minutes before the end of the month. If the purchase is made on May 25, the customer will have 30 days past May 25 to use the extra minutes - the extra minutes do not expire at the end of May. The 30 day period gives sufficient flexibility to our customers and is a reasonable accommodation that is consistent with the public interest.

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Supplemental Response: Service offerings that include the rollover of unused minutes are not currently a standard offering with respect to TAG Mobile's product portfolio. However, in certain jurisdictions commission Staff has indicated that rollover of Lifeline minutes is required for TAG Mobile's Lifeline offering to be considered in the public interest. In those cases, TAG Mobile has included an additional Lifeline Service offering option that includes 150 free monthly minutes of use with full rollover in addition to its Basic Lifeline Service offering of 250 free monthly minutes of use without rollover allowing Lifeline customers the option to choose a plan that includes a rollover component. TAG Mobile will offer such an alternative plan in Massachusetts should Staff so request.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-38 TAG Mobile states that it “employs both Verizon and Sprint carrier networks to ensure ubiquitous coverage.” Petition at 14. Regarding Exhibit A (“Map and Wire Centers”) to the Petition:

- a. Clarify the meaning of “Network 1” and “Network 2” on the coverage map provided. Clarify whether TAG Mobile is seeking to provide Lifeline and Link-Up service throughout the areas covered by Networks 1 and 2 in the map provided.**

Response: With respect to the coverage map provided, Network 1 indicates Sprint’s coverage area, and Network 2 indicates Verizon Wireless’ coverage areas. TAG Mobile confirms that it seeks to provide Lifeline and Link-Up service throughout the service areas of both Sprint and Verizon Wireless, as indicated in the map provided.

- b. Indicate whether the Sprint Nextel network and/or Verizon Wireless network provides coverage across all of the towns listed in Exhibit A. Clarify whether TAG Mobile considers all of the towns listed in Exhibit A to be non-rural areas and explain why.**

Response: TAG Mobile is presently researching the response to this information request and will provide a supplemental response when the information becomes available.

Supplemental Response: TAG Mobile is still awaiting information from its providers, but expects to respond not later than Wednesday, October 31, 2012.

- c. Provide the corresponding wire center information for the CLLI codes listed in Exhibit A.**

Response: TAG Mobile is presently researching the response to this information request and will provide a supplemental response when the information becomes available.

Supplemental Response: TAG Mobile is still awaiting information from its providers, but expects to respond not later than Wednesday, October 31, 2012.

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- d. Identify the date the coverage map was generated. Provide the most recent coverage area map available for each network that TAG Mobile will use to provide service in Massachusetts.**

Response: The map provided with TAG Mobile's Petition for ETC designation in Massachusetts was created July 1, 2011 and is the most recent coverage map available for TAG Mobile's underlying carriers, Sprint and Verizon Wireless.

Person Responsible for Answer: Frank Del Col

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D.T.C. 1-40 Explain whether TAG Mobile is willing to abide by the following conditions agreed to by Virgin Mobile in *In the Matter of the Application of Virgin Mobile USA, L.P.'s Petition for Limited Designation as an Eligible Telecommunications Carrier*, D.T.C. 10-11, Order Approving Petition (Sept. 9, 2011). If not, explain with specificity why not.

- a. Provide quarterly reporting to the Department of customer accounts terminated for inactivity.**

Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

- b. Provide reporting of consumer complaints to the Department regarding its Lifeline service and agree to participate in dispute resolution by the Department's Consumer Division.**

Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

- c. Provide reporting to the Department of USF support received for Massachusetts consumers.**

Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

- d. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline service customers. Agree to an ongoing obligation to notify the Department of any future changes to its rates, terms, or conditions.**

Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

Supplemental Response: TAG Mobile has already complied with this condition as evidenced by its responses to Exh. DTC-TAG 1-36e-Supp and if required of similarly situated ETCs.

- e. Include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service.**

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Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

Supplemental Response: TAG Mobile is willing to comply with this condition as evidenced by its response to DTC 1-37.

f. Provide Public Safety Answering Points (PSAP) self-certification to the Department.

Response: TAG Mobile is willing to comply with this condition if required of similarly situated ETCs.

g. Require all customers to contact TAG Mobile directly to self-certify, under penalty of perjury, that they qualify for Lifeline service and that the customer's household is not already receiving Lifeline service.

Response: TAG Mobile's current Compliance Department verification protocol complies with this condition.

Supplemental Response: TAG Mobile has already implemented 100% direct self-certification requirements in compliance with this request pursuant to the revised rules of FCC 12-11.

h. Implement a 60-day inactive account (non-use) policy whereby if a customer account is inactive for 60 days, TAG Mobile will suspend the collection of the USF support for the account during the pendency of a subsequent 30 day grace period during which Tag Mobile will attempt to re-engage the customer. In the event TAG Mobile cannot re-engage the customer, TAG Mobile will discontinue the customer's service so that it does not receive USF support for the grace-period.

Response: TAG Mobile's current Non-Usage Plan complies with this condition.

Person Responsible for Answer: Frank Del Col