

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation of TAG)
Mobile, LLC to Show Cause Why This) Docket No: 16-TAGC-323-SHO
Commission Should Not Initiate Sanctions and)
Fines and Cancel, Suspend and Revoke Any)
Authority the Carrier Currently Holds.)

**TAG MOBILE, LLC'S
PETITION FOR RECONSIDERATION**

COMES NOW, TAG Mobile, LLC ("TAG") and, pursuant to K.S.A. 66-118b, K.S.A. 2014 Supp. 77-529, and K.A.R. 82-1-235, respectfully petitions for reconsideration of the January 14, 2016 Order issued by the State Corporation Commission of the State of Kansas ("Commission" or "KCC") in the above captioned matter. In support of this Petition for Reconsideration ("Petition"), TAG states as follows:

1. On December 23, 2015, the Commission Staff ("Staff") submitted to the Commission a Report and Recommendation ("R&R") alleging that TAG had failed to meet certain conditions placed upon its Lifeline-Only Eligible Telecommunications Carrier ("ETC") status, to wit:

- failing to provide voice telephony service to low-income consumers as required by 47 C.F.R. 54.101(a);
- failing to utilize its own facilities or a combination of its own facilities and resale of another carrier's services in providing service; and
- failing to pass along its entire Lifeline discount to the consumer.¹

2. On January 14, 2016, the Commission issued an Order to Show Cause ("Order") based upon Staff's R&R that did the following:

A. ordered TAG to show cause, within thirty (30) days of receipt of the Order, why it

¹ R&R, p. 4.

should not be subject to sanctions and fines and its ETC designation should not be cancelled, suspended and/or revoked;

- B. required the Kansas Universal Service Fund ("KUSF") administrator, GVNW, to immediately cease providing Lifeline support to TAG Mobile, LLC until the matters at issue in the Staff's R&R are resolved; and
- C. notified TAG of its fifteen (15) day period to file for reconsideration of the Order or any part thereof.

3. TAG hereby petitions the Commission for reconsideration of the part of its Order requiring GVNW to cease providing Lifeline support to TAG until the matters in this docket are resolved.

4. At this time, TAG has been designated by the Commission as an ETC qualified to receive Lifeline support from the KUSF.² Staff has made allegations against TAG, but as of yet TAG has not had an opportunity to respond to those allegations and they remain unproven. Under such circumstances, it is inappropriate to terminate TAG's right to receive KUSF Lifeline payments.

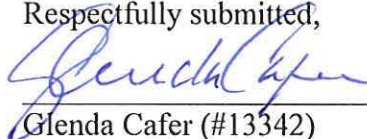
5. TAG became aware of the charges contained in Staff's R&R on or about January 4, 2016, at which time TAG began a thorough investigation into the matters alleged. TAG's goal is to have a response available to file within the thirty days set out in the Commission's Order, but at this time is unable to confirm or deny Staff's allegations or assess the impact of the allegations should they prove to be true in whole or in part.

6. While it is not appropriate to cease Lifeline payments to TAG at this juncture in the proceeding, TAG would voluntarily agree that during the pendency of this docket the Commission could have GVNW set aside any payments due to TAG and hold them until the

² The Commission granted TAG ETC status in its November 15, 2012 Order in Docket No. 12-TAGC-843-ETC. That Order remains effective at this time.

final outcome of this docket is known. Amounts accrued during that time could be paid to TAG at the conclusion of this case, in whole or in part, depending upon the outcome of this docket.

Respectfully submitted,



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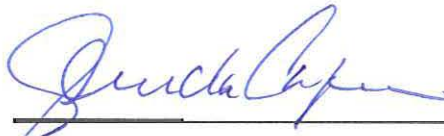
ATTORNEYS FOR TAG MOBILE, LLC

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 2nd day of February, 2016 to:

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Glenda Cafer