

[REDACTED]

**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 Commission Should Not Initiate) Docket No. 16-TAGC-323-SHO
Sanctions and Fines and Cancel, Suspend)
and Revoke Any Authority the Carrier)
Currently Holds.)

**STAFF'S SUMMARY JUDGMENT MOTION TO REVOKE TAG MOBILE'S ETC
DESIGNATION; RETURN KLSP FUNDS; AND ASSESS PENALTIES**

The Staff of the Kansas Corporation Commission (Staff and Commission, respectively), pursuant to K.S.A 77-519(a), hereby moves the Commission to issue a summary judgment order: 1) revoking TAG Mobile, LLC's (TAG) federal and state Eligible Telecommunications Carrier (ETC) designation in Kansas; 2) requiring TAG to repay all Kansas Lifeline Service Program (KLSP) support TAG has received since it was granted ETC designation in Docket No. 12-TAGC-843-ETC;¹ 3) determining TAG is ineligible to receive KLSP credits accrued since December 2015; and 4) assessing a \$96,000 penalty. In support of its Motion, Staff states the following:

I. Jurisdiction and Outstanding Hearing Request

1. The Commission has jurisdiction over the KLSP and the Kansas Universal Service Fund (KUSF) pursuant to K.S.A. 66-2002(f), K.S.A. 66-2002(h), K.S.A. 66-2006, and K.S.A. 66-2008. Additionally, the Commission has jurisdiction over ETC designation for federal Lifeline purposes under 47 U.S.C. § 214(e).

¹See Order on ETC Application, Docket No. 12-TAGC-843-ETC (Nov. 15, 2012) (Order on ETC Application).

2. On May 17, 2016, the Commission directed the Prehearing Officer in this matter to confer with the parties to schedule an evidentiary hearing.² On July 19, 2016, the Prehearing Officer contacted the parties proposing to hold an informal teleconference to develop a schedule or requesting the parties to submit a joint proposed schedule. On the same day, counsel for TAG notified the Prehearing Officer that the parties would confer and provide a proposed procedural schedule. On July 27, 2016, Staff counsel provided a proposed procedural schedule to TAG, requesting feedback. However, on August 1, 2016, counsel for TAG withdrew. To date, TAG has not substituted counsel in this matter and has not provided feedback on the originally proposed procedural schedule. K.A.R. 82-1-228(d)(2) requires corporations to appear at hearing by counsel, unless excepted. Because TAG could not appear at a hearing without counsel, and significant delay has occurred in this proceeding, Staff believes its immediate Motion is appropriate.

II. Summary Judgment and Standard of Proof

3. According to the Kansas Supreme Court:

[s]ummary judgment is appropriate when the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law. The trial court is required to resolve all facts and inferences which may reasonably be drawn from the evidence in favor of the party against whom the ruling is sought. When opposing a motion for summary judgment, an adverse party must come forward with evidence to establish a dispute as to a material fact. In order to preclude summary judgment, the facts subject to the dispute must be material to the conclusive issues in the case.³

²Order Denying Motion to Dismiss; Granting Evidentiary Hearing; Designating Prehearing Officer; and Protective and Discovery Order, p. 15 (May 17, 2016).

³O'Brien v. Leegin Creative Leather Prod., Inc., 294 Kan. 318, 330, 277 P.3d 1062, 1072 (2012).

4. In order for the Commission to issue a judgment revoking TAG's ETC designation in Kansas, order refunds, or assess penalties, the Commission must determine by a preponderance of the evidence that TAG has violated Kansas law, regulations, or Commission order.⁴ For federal ETC revocation, the Commission must determine that continuation of TAG's ETC designation is no longer consistent with the public interest, convenience, and necessity.⁵ The evidence cited by the Commission must be substantial when viewed in light of the record as a whole.⁶

III. Summary of TAG's Violations

5. TAG has violated four Lifeline or KLSP requirements:

- (1) TAG failed to utilize its "own facilities" to provide service to qualifying low-income consumers as required by K.S.A. 66-2008(b)(1)⁷ and the Commission's *Order on ETC Application*, thereby failing to meet its KLSP obligations;
- (2) TAG failed to "pass through" the full Lifeline and KLSP subsidies to qualifying low-income consumers as required by the Commission's *Order on ETC Application*⁸ and 47 C.F.R. § 54.403(a)(1), violating its federal and state Lifeline obligations;
- (3) TAG failed to provision service "directly" to the qualifying low-income customer in order to seek Lifeline reimbursement as required under 47 C.F.R. § 54.407(a) and 47 C.F.R. § 54.201, violating its federal and state Lifeline obligations; and
- (4) TAG requested KLSP reimbursement that is "excessive" compared to its rate for the offering, in violation of the Commission's *Order Maintaining Current Kansas Lifeline Service*

⁴See *Bender v. Clark*, 744 F.2d 1424, 1429 (10th Cir. 1984) (stating: "[i]t is well settled that where Congress has failed to establish the degree of proof required in an administrative proceeding, the judiciary is the traditional, and the most appropriate, forum to prescribe the standard...The traditional standard required in a civil or administrative proceeding is proof by a preponderance of the evidence.").

⁵See 47 U.S.C. § 214(e)(2).

⁶See K.S.A. 77-621(c)(7).

⁷K.S.A. 66-2008(b)(1) cites to 47 U.S.C. § 214(e)(1)(A).

⁸Order Granting ETC Designation, ¶¶ 8-10, Ordering Clauses B and D.

Program Discount and Policy (KLSP Policy Order) in Docket No. 13-GIMT-597-GIT and 47 C.F.R. § 54.407(b), and violated its federal and state Lifeline obligations.⁹

IV. Legal Requirements Relevant to Proceeding

6. The “own facilities” requirement stems from K.S.A. 66-2008(b), which states:

(b) Pursuant to the federal act, distributions from the KUSF shall be made in a competitively neutral manner to qualified telecommunications public utilities, telecommunications carriers and wireless telecommunications providers, **that are deemed eligible both under subsection (e)(1) of section 214 of the federal act** and by the commission. (Emphasis added).¹⁰

Section 214(e)(1) of the federal act, as referenced by K.S.A. 66-2008(b), states:

(e) Provision of universal service

(1) Eligible telecommunications carriers

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received--

(A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either **using its own facilities** or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution. (Emphasis added).¹¹

Therefore, an ETC may only receive KLSP funds from the KUSF if it uses its own facilities, or a combination of its own facilities and resale of another carrier's services to provide KLSP service

⁹Order Maintaining Current Kansas Lifeline Service Program Discount and Policy, p. 5, Docket No. 13-GIMT-597-GIT (Feb. 20, 2014); 47 C.F.R. § 54.407(b).

¹⁰K.S.A. 66-2008(b). KLSP distributions are paid from the Kansas Universal Service Fund (KUSF). See Order, ¶ 131, Docket No. 94-GIMT-478-GIT (Dec. 27, 1996).

¹¹47 U.S.C. § 214(e)(1).

to end users. TAG has received forbearance from this requirement federally,¹² but such forbearance is not available for KLSP recipients due to the statutory language.¹³

7. The “pass through” requirement stems from 47 C.F.R. § 54.403(a)(1), which states:

(a) The federal Lifeline support amount for all eligible telecommunications carriers shall equal:

(1) *Basic support amount.* Federal Lifeline support in the amount of \$9.25 per month will be made available to an eligible telecommunications carrier providing Lifeline service to a qualifying low-income consumer, except as provided in paragraph (a)(2) of this section, if that carrier certifies to the Administrator that it will **pass through the full amount of support to the qualifying low-income consumer** and that it has received any non-federal regulatory approvals necessary to implement the rate reduction. (Emphasis added).¹⁴

Although 47 C.F.R. § 54.403(a)(1) pertains specifically to the federal Lifeline program, the Commission has adopted such “pass through” requirement for purposes of receiving KLSP funds.¹⁵

8. Specifically, with respect to TAG, the *Order on ETC Application* approving TAG’s ETC designation for both state and federal purposes contained the following provision:

Lifeline customers will be able to apply the Lifeline discount to any calling plan offered by the carrier. Additionally, **the entirety of the Kansas Lifeline Service Program ("KLSP") discount will be passed along to the end user consumer.** If the carrier offers the same service plans in other states that do not have additional support on top of federal Lifeline subsidies, the carrier will offer a plan in Kansas that **justifies the additional Lifeline funds from the KLSP.** (Emphasis added).¹⁶

¹²Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless and TAG Mobile, WC Docket Nos. 09-197 and 11-42 (Aug. 8, 2012) (https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1286A1.pdf).

¹³See K.S.A. 66-2008(b); Order on ETC Application, ¶ 3a.

¹⁴47 C.F.R. § 54.403(a)(1).

¹⁵See Order Addressing Issues Concerning the Kansas Lifeline Service Program, p. 7-8, Docket No. 10-GIMT-658-GIT (Aug. 17, 2011); Order on ETC Application, ¶ 4a.

¹⁶See Order on ETC Application, ¶ 4a. (Internal citations omitted).

9. The “pass through” requirement makes sure that a customer receives the entire discount, and if such customer is eligible for KLSP funds on top of federal Lifeline funds, he or she must receive a benefit commensurate with the increased funding. For example, an ETC that offers a “free” 500 minutes of voice calling per month plan in a state where customers qualify only for the \$9.25 federal Lifeline subsidy would be expected to offer additional value to Kansas customers, such as 900 voice calling minutes,¹⁷ because the ETC receives an additional \$7.77 per month from the KLSP for the low-income subscribers. The ETC may not “pocket” all or part of \$7.77; it must provide additional benefits to a KLSP subscriber sufficient to justify receipt of the additional subsidy.¹⁸

10. The requirement that an ETC provision service “directly” to the qualifying low-income consumer comes from 47 C.F.R. § 54.407(a), which states:

(a) Universal service support for providing Lifeline shall be provided directly to an eligible telecommunications carrier based on the number of actual qualifying low-income customers **it serves directly** as of the first day of the month. After the National Verifier is deployed in a state, reimbursement shall be provided to an eligible telecommunications carrier based on the number of actual qualifying low-income customers **it serves directly** as of the first day of the month found in the National Verifier. (Emphasis added).¹⁹

11. The FCC adopted this requirement to prevent two companies from claiming the same low-income customer. The FCC stated:

We next attack a potential source of waste and abuse in the Lifeline program by addressing issues raised by the Commission in the 2012 *FNPRM* pertaining to resold Lifeline services. **We now find that only ETCs providing Lifeline service directly to the consumer may seek reimbursement from the Lifeline program**

¹⁷Note this is purely an example. ETCs may justify the additional funding in a variety of ways. Other examples could be additional texting, additional data, or long distance calling minutes. This is not an exhaustive list.

¹⁸See Order on ETC Application, ¶ 4a, 8, 9.

¹⁹47 C.F.R. § 54.407(a).

for the service provided. We revise sections 54.201, 54.400, 54.401, and 54.407 to reflect this change. (Emphasis added).²⁰

12. Finally, the requirement that an ETC not seek “excessive” Lifeline or KLSP support comes from 47 C.F.R. § 54.407(b) and the Commission’s KLSP Policy Order.²¹

13. 47 C.F.R. § 54.407(b) provides:

(b) For each qualifying low-income consumer receiving Lifeline service, the reimbursement amount shall equal the federal support amount, including the support amounts described in § 54.403(a) and (c). The eligible telecommunications carrier’s universal service support **reimbursement shall not exceed the carrier’s rate for that offering**, or similar offerings, subscribed to by consumers who do not qualify for Lifeline. (Emphasis added).²²

14. The requirement that ETCs not seek “excessive” Lifeline or KLSP funds was enacted to ensure ETCs are not exploiting the program for economic gain.²³ The subsidy provided to an ETC should not be more than the rate for the service.

V. Undisputed Evidence of Own Facilities Violation - Los Angeles, CA Switch

15. Staff has discovered two distinct KLSP violations of the “own facilities” requirement made by TAG. The first violation pertains to the facilities TAG claimed it was using in its initial ETC Application in 2012. As will be explained below, TAG admitted that it did not route 100% of its Lifeline service calls through its switch in Los Angeles, CA, as it represented to the Commission in 2012.

16. TAG’s ETC Application referenced the fact that TAG would utilize its own facilities to administer calls numerous times.²⁴ TAG specifically stated:

²⁰In the Matter of Lifeline & Link Up Reform & Modernization, 30 F.C.C. Rcd. 7818, 7899 (2015).

²¹Order Maintaining Current Lifeline Service Program Discount and Policy, p. 3, Docket No. 13-GIMT-597-GIT (Feb. 20, 2014) (KLSP Policy Order).

²²47 C.F.R. § 54.407(b).

²³See KLSP Policy Order, p. 3 (stating “[o]n the question of “negative,” or less than zero service rates, Staff explained the Commission does not allow a provider to receive the full KLSP discount if it would result in a rate less than zero. Under those circumstances, allowing a full discount would provide a windfall to carriers.”).

TAG Mobile has filed with the FCC its Compliance Plan, attached hereto as Exhibit D, to comply with the blanket forbearance included in the Lifeline Reform Order. **However, in Kansas TAG Mobile will utilize its ability to provide the supported services through the use of its own facilities.** (Emphasis added).²⁵

17. TAG's facilities were partially identified in Exhibit N to TAG's ETC Application.²⁶ Confidential Exhibit N showed calls being routed through a "Call Switch" located at 650 S. Grand Ave., 10th Floor, Los Angeles, CA 90017.²⁷

18. On July 24, 2012, Staff issued Data Request (DR) 2.5, wherein it asked TAG the following question:

2.5. In its Application, TAG discusses a class 5 cisco switch located in Los Angeles, CA. b) ***Does TAG route all voice telephony traffic through this switch?*** (Emphasis added).²⁸

19. TAG's response to DR 2.5, dated August 7, 2012, stated that in Kansas TAG would "route PSTN traffic, international traffic, OS and DA calls ***directly through its switch...***" (Emphasis added).²⁹

20. Furthermore, TAG's response to DR 3.1a, dated August 7, 2012, stated:

TAG provides voice grade access to the PSTN through TAG's Network Operation Center (NOC) located at 8435 Stemmons Freeway, Dallas, Texas. The NOC is on line with TAG's remote Cisco call control/authorization array, and ***its Cantata Excel network switch, located at the 650 South Grand Avenue, Los Angeles, CA POP hotel.*** All wireless voice traffic gains network authorization/access from TAG's Call Control & Authorization Platform. This same intelligent calling platform is used to communicate to the Cisco call controller before being passed to the underlying carrier network for call completion. ***A percentage of all PSTN traffic, as well as Operator Services, Directory Services***

²⁴See Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis, p. 4-5, 7, 8, Confidential Exhibit N to TAG's ETC Application, Docket No. 12-TAGC-843-ETC (May 22, 2012) (TAG's ETC Application).

²⁵TAG's ETC Application at 4.

²⁶Confidential Exhibit N to TAG's ETC Application. (Attached hereto as Confidential Exhibit A).

²⁷Id. (Confidential Exhibit A).

²⁸TAG's Response to Staff's Data Request 2.5 (August 7, 2012). (Attached hereto as Exhibit B).

²⁹Id. (Exhibit B).

and international terminated calling traffic passes through the TAG Mobile Cantata network switch.” (Emphasis added).³⁰

21. Staff followed up with DR 4.2, dated August 16, 2012, asking TAG: “What percentage of Kansas PSTN traffic passes through TAG’s Cantata network switch?”³¹ TAG responded on August 23, 2012, stating: “With regard to the appropriate percentage of Kansas PSTN traffic that passes through TAG’s switch... *TAG would defer to the recommendation of the Kansas Commission....*” (Emphasis added).³²

22. Ultimately, the Commission adopted Staff’s Report and Recommendation which stated TAG will “meet the ‘own facilities’ requirement in 47 U.S.C. § 214(e)(1) *if it sends 100% of its voice traffic, emergency calls excluded, through its switch.*” (Emphasis added).³³

23. Staff has determined through discovery in this proceeding that TAG did not send 100% of its voice traffic through the Los Angeles, CA switch. In DR 18, dated September 21, 2016, Staff asked TAG: “From November 2012 to April 2015, *did TAG route 100% of its Kansas Lifeline voice traffic through the Class 5 Cisco switch* referenced in Docket No. 12-TAGC-843-ETC?” (Emphasis added). TAG answered: “*No.*” (Emphasis added).³⁴

VI. Undisputed Evidence of Own Facilities Violation – Third-Party Vendors and Selectel Agreements

24. TAG’s second violation of the “own facilities” requirement for KLSP purposes involves a third-party vendor agreement wherein the third-party vendor provided service using TAG’s name and ETC designation, but TAG’s facilities were not used to provide the service.³⁵

³⁰TAG’s Response to Data Request 3.1a, Docket No.12-TAGC-843-ETC, (Attached hereto as Exhibit C).

³¹The “Cantata network switch” is synonymous with the “class 5 cisco switch” located in Los Angeles or just the “switch.” See TAG’s Response to Data Request 3.1 (Exhibit C).

³²TAG’s Response to Data Request 4.2 (Aug. 23, 2012) (Attached hereto as Exhibit D).

³³See Order on ETC Application, ¶ 10.

³⁴TAG’s Response to Data Request 18 (September 20, 2016) (Attached hereto as Exhibit E).

³⁵See Independent Sales Organization Agreement (October 20, 2014). (Attached hereto as Confidential Exhibit F). (ISO Agreement).

25. Specifically, it is undisputed that TAG and Selectel, Inc. (Selectel) entered into an Independent Sales Organization Agreement (ISO Agreement) on October 20, 2014.³⁶

26. It is also undisputed by TAG in its pleading in this docket that under the terms of the ISO Agreement:

**** (1)** [REDACTED]

***** (Emphasis added).**³⁷

27. The ISO Agreement specifically provided that:

****** [REDACTED]

• [REDACTED]

*******³⁸

28. Based upon a plain reading of the ISO agreement, and TAG's explanation, end users' services under the ISO agreement were provided by *Selectel*, rather than TAG. Because TAG's own facilities were not being utilized under this arrangement, TAG violated the own facilities requirement.

VII. Undisputed Evidence of Pass Through Violation – Selectel Agreement

³⁶Id. (Confidential Exhibit F).

³⁷Response of TAG Mobile, LLC to Show Cause Order, p. 3 (Feb. 17, 2016) (TAG's Response).

³⁸ISO Agreement, p. A-1, A-2. (Confidential Exhibit F).

29. Staff has acquired undisputed evidence of two distinct federal Lifeline and KLSP “pass through” violations made by TAG.

30. The first “pass through” violation pertains to the aforementioned ISO Agreement with Selectel.

31. TAG admitted in a responsive pleading that the ISO Agreement contains the following terms pertaining to payment: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] .***³⁹

32. As mentioned above, the ISO Agreement required Selectel ** [REDACTED] [REDACTED] .**⁴⁰ For ** [REDACTED] **, TAG paid ** [REDACTED] ** per end user per month to Selectel.⁴¹

33. Notwithstanding the fact that the ISO Agreement violates the “own facilities” requirement, such agreement violates the “pass through” requirement because TAG was compensating Selectel ** [REDACTED] ** per end user, and ** [REDACTED] [REDACTED] [REDACTED] .** Thus, TAG did not pass through the entire federal Lifeline and KLSP discounts to the low-income consumer, as required.

VIII. Undisputed Evidence of Pass Through Violation – No Additional Value to Kansans

34. The second “pass through” violation pertains to services offered to KLSP subscribers. As noted above, TAG receives a \$7.77 monthly KSLP subsidy on top of the \$9.25

³⁹TAG’s Response, p. 3.

⁴⁰ISO Agreement at p. A-2. (Confidential Exhibit F).

⁴¹ISO Agreement, p. B-1, B-2 (stating: ** “[Selectel] is eligible for the monthly payments with respect to an approved End User acquired by [Selectel] after such approved End User’s first full month on the TAG Lifeline service.”**). (Confidential Exhibit F).

federal Lifeline subsidy. KLSP subscribers must receive additional services to justify TAG receiving the additional subsidy in Kansas.

35. When TAG was originally granted its ETC designation in 2012, it stated that it offered a nationwide 250 minute calling plan, but that it would provide low-income Kansans with an enhanced 500 minute calling plan due to the receipt of the \$7.77 KLSP subsidy.⁴²

36. However, at some point Staff cannot discern, TAG began to offer the 500 minute calling plan nationwide, and kept its Kansas offering the same.⁴³

37. For example: Arkansas, Colorado, and Iowa do not have state Lifeline programs and do not offer additional subsidies on top of the federal \$9.25 Lifeline subsidy.⁴⁴ Yet a review of TAG's Lifeline plans in those states shows TAG offers the same 500 minute, unlimited global text messaging plan as the one offered in Kansas.⁴⁵ Kansans are not receiving any additional benefit for the \$7.77 KLSP subsidy. This is a violation of the "pass through" requirement.

IX. Undisputed Evidence of "Direct" Provision of Service Violation

38. Staff has discovered undisputed evidence that TAG sought reimbursement for Lifeline funds for qualifying low-income customers that it *does not serve directly*, in violation of 47 C.F.R. § 54.407(a).

39. During its efforts to discover whether TAG had any other arrangements similar to the ISO Agreement, Staff sent DR 13, dated July 28, 2016, asking TAG to: "(a) verify the

⁴²TAG's Response to Data Request 2.1, Docket No. 12-TAGC-843-ETC (Aug. 7, 2012). (Attached hereto as Exhibit G).

⁴³Attached as Exhibit A to TAG's Response filed on February 17, 2016, was a listing of TAG's Kansas based Lifeline offerings. TAG's "base plan" included "500 local voice minutes, \$1.50 calling credit for international calling, and unlimited global text messaging every 30 days from date of activation, and a free 911/E911 complaint feature handset..." The base plan was free to KLSP customers. A review of TAG's website indicates that this is the same plan currently offered in Kansas.

⁴⁴See NRRI State Universal Service Funds 2014 Report No. 15-05, p. 20-21 (June 2015). (Attached hereto as Exhibit H).

⁴⁵See Exhibits I, J, K, and L, attached hereto.

number of lines reported for Kansas Lifeline Service Program purposes” and “(i) the number of Lifeline connections provided *directly by TAG*.” (Emphasis added).⁴⁶

40. TAG’s response to DR 13 shows that since at least January 2013, TAG has failed to directly provide service to its Lifeline end users.⁴⁷ For example, in January 2016, TAG claimed 3,302 KLSP lines, but only *directly* provided service to 98.⁴⁸

41. TAG’s responses to both DR 7 and DR 13 also identify multiple third-party vendors including: Worldfone Global Wireless, Absolute Telecom, Peter Sirianni, Inc., Expert Communications Marketing, TEAM Marketing Group, Inc., On the Go Prepaid Wireless, LLC, among others. Staff is unsure of the terms of each agreement because TAG initially stated there were only two ISO agreements and has not been provided copies of each agreement, but any agreement wherein TAG is not directly providing service to end users violates the “direct” service requirement, and potentially the “own facilities” requirement.⁴⁹

X. Undisputed Evidence of “Excessive” Reimbursement Violation

42. Finally, Staff has discovered undisputed evidence that TAG sought “excessive” KLSP support that is greater than the carrier’s service rate for the offering.

43. In Request No. 5-3, GVNW Consulting, Inc. (GVNW), the current KUSF administrator, asked TAG for copies of residential customer bills in conjunction with its KUSF

⁴⁶TAG’s Updated Response to Staff Data Request 13 (dated Oct. 26, 2016). (Attached hereto as Exhibit M).

⁴⁷Id. (Exhibit M).

⁴⁸Id. (Exhibit M). TAG contends in its Updated Response to Staff Data Request 13, provided October 26, 2016, that the “Other Agreements were provided Lifeline connections directly through TAG Mobile.” Staff does not know if this is correct because it has not reviewed all of the ISO Agreements. However, out of an abundance of caution, Staff included the 35 lines listed as served directly by TAG as well as the 63 Lifeline connections from Other Agreements in the 98 connects served by TAG directly calculation.

⁴⁹See Id (Exhibit M); TAG’s Response to Staff Data Request 7 (dated Mar. 18, 2016). (Attached hereto as Exhibit N). TAG’s response to DR 7 stated, “There were two other ISO Agreements which are no longer active. See Attached.” The attached ISO Agreements were with Casepro Solutions, Inc. and Worldfone Global Wireless. No other ISO Agreements were identified prior to the response to DR 13 and none of the other ISO agreements have been provided. (Casepro and Worldfone agreements omitted from attached Exhibit N).

audit of TAG.⁵⁰ TAG provided copies of ten customer billing screen shots, which list TAG's rate for its 500 minute, unlimited text messaging plan as \$12.75.⁵¹

44. The credits provided for the federal Lifeline program and the KLSP, combined, total \$17.02. TAG should have requested reimbursement of no more than \$12.75 per Lifeline connection from the federal Lifeline program and the KLSP because this is the retail rate for the service plan offered to KLSP customers. However, based upon GVNW's⁵² and USAC's⁵³ records, TAG sought reimbursement for the full state and federal Lifeline discounts - \$17.02 - \$4.27 more than the rate for each Lifeline connection.

XI. Disputed or Inconclusive Evidence

45. Staff's Motion for Summary Judgment is not based on the following because it has been disputed by TAG, or because it is inconclusive, however, Staff would like to point out some additional evidence pertaining to this matter.

46. In addition to the ISO Agreement with Selectel, the two parties also had a Joint Venture Agreement. Under the terms of the Joint Venture Agreement, ** [REDACTED]

[REDACTED]

[REDACTED] ***⁵⁴ This Joint

Venture Agreement would appear to involve a "pass through" violation as well as an "own facilities" violation; however, the terms of the Joint Venture Agreement are silent as to who actually provides service to end users.

⁵⁰TAG's Response to KUSF Carrier Audit Information Request 5 (dated Oct. 17, 2016) (Attached hereto as Exhibit O). This request was issued by GVNW in Docket No. 17-TAGC-029-KSF.

⁵¹Id. (Exhibit O).

⁵²See Summary of Accrued Lifeline Credits as Requested by TAG Mobile (Attached hereto as Exhibit P). Exhibit P was compiled by Commission Staff based upon GVNW's Confidential Carrier Remittance Worksheets (CRWs) for the months indicated in the document. Staff omitted the actual CRWs from this Motion to save space, but they can be provided if required by the Commission.

⁵³See USF Funding Report for TAG Mobile, Inc. for Kansas (Attached hereto as Exhibit Q). Exhibit Q is a listing of the federal Lifeline funding provided to TAG Mobile in Kansas by month.

⁵⁴TAG Mobile/Selectel Joint Venture Agreement, p. 2 (Oct. 15, 2015) (Attached as Confidential Exhibit R).

47. Staff has also received inconsistent responses to the question of whether TAG ever owned a switch in Los Angeles, CA and whether TAG *currently* provides services using its own facilities.

48. With respect to the Los Angeles, CA, switch, Staff DR 16, dated August 24, 2016, asked TAG to: “provide any documentation that TAG has to verify that TAG *ever owned* the class 5 Cisco switch in Los Angeles, CA. Please include all relevant documentation including the date the switch was acquired, the date it was sold, etc.”⁵⁵ TAG responded on August 31, 2016 with the following: “As previously stated, we have been unable to locate any documentation on the ownership of the switch.”⁵⁶ Subsequently, on October 26, 2016, TAG updated its response to DR 16, citing to an updated response to DR 12, also provided on October 26, 2016, wherein a “Network Switching and Facilities Capital Lease” between Reunion Communications, Inc. (Reunion) and TAG and an Invoice between Reunion and TAG coming out of LaGrange, Illinois were attached.⁵⁷ Staff is unsure how these documents prove TAG owned a class 5 Cisco switch in Los Angeles, CA or why they were not provided in response to Staff’s original request. The “Network Switching and Facilities Capital Lease” is just that – a lease. It does not prove that TAG owned anything, let alone a Class 5 switch in Los Angeles, CA.

49. With respect to whether TAG currently owns any facilities, Staff DR 10, dated July 18, 2016, asked TAG for: “[a] description (e.g. switch, lines, etc.) and location of each facility TAG owns used to provide service to KLSP subscribers.”⁵⁸ TAG responded to DR 10 on

⁵⁵TAG’s Response to Staff Data Request 16 (Aug. 31, 2016) (Attached hereto as Exhibit S).

⁵⁶Id. (Exhibit S).

⁵⁷TAG’s Updated Response to Staff Data Request 16 (Oct. 26, 2016) (Attached hereto as Exhibit T); TAG’s Updated Response to Staff Data Request 12 (Oct. 26, 2016) (Attached hereto as Exhibit U).

⁵⁸TAG’s Response to Staff Data Request 10 (July 25, 2016) (Attached hereto as Exhibit V).

July 25, 2016, admitting that it “*does not currently own its own facility.*” (Emphasis added).⁵⁹

TAG updated its answer to DR 10 on October 26, 2016, to state “TAG owns a managed voice switch located at 2775 Northwoods Pkwy, Norcross, Georgia.”⁶⁰ TAG did not indicate when it purchased the switch, whether Kansas Lifeline traffic is routed through the Georgia switch, or provide proof that it owns said switch.

50. Finally, it should be noted that Selectel, Inc. has not been granted ETC designation, and is therefore not authorized to collect or receive from TAG any KLSP or Lifeline subsidies. TAG represented in its February 17, 2016, filing in this docket that its ISO Agreement was terminated January 4, 2016.⁶¹ However, TAG’s response to DR 13 indicates that at least until June 2016, TAG continued its agreement with Selectel, Inc.⁶² Staff is unsure what to make of this contradictory information.

XII. Recommended Penalties

51. With respect to Staff’s Motion for Summary Judgment, any monetary penalties assessed by the Commission would be discretionary. Staff does not read the statutes to entitle it to a specific judgment as a matter of law. However, Staff does believe that it is entitled to findings of violations as a matter of law.

52. With that in mind, Staff no longer believes it is in the public interest for TAG to provide KLSP or federal Lifeline services in Kansas. TAG has failed to comply with its federal and state Lifeline obligations by performing the following actions: (a) failing to use its own facilities to provide KLSP service in Kansas; (b) failing to pass through all Lifeline subsidies received to the end-user; (c) failing to provide service directly to qualifying low-income

⁵⁹ Id. (Exhibit V).

⁶⁰ TAG’s Updated Response to Staff Data Request 10 (Oct. 26, 2016) (Attached hereto as Exhibit W).

⁶¹ TAG’s Response at 8.

⁶² TAG’s Updated Response to Staff Data Request 13 (Oct. 26, 2016) (Exhibit M).

consumers; (d) seeking reimbursement in excess of its standard monthly Lifeline service rate; and (e) allowing Selectel, a non-ETC, to offer Lifeline services using TAG's ETC designation and receive government subsidies.

53. Staff recommends that the Commission revoke TAG's ETC designation for both federal and state purposes.

54. Staff also recommends that TAG be ordered to refund all KLSP subsidies received (\$942,291.21) since November 15, 2012.⁶³ Furthermore, in its March 3, 2016, *Order Granting Petition for Reconsideration*, the Commission determined GVNW would accrue the KLSP credits requested by TAG pending outcome of this docket. Staff recommends TAG should not collect any of the KLSP credits accrued since December 2015, which currently total \$217,062.72.⁶⁴ This is justified due to TAG's failure to meet its state KLSP obligations as set forth in this Motion.

55. Finally, Staff recommends TAG Mobile be penalized in the amount of \$96,000.⁶⁵ This recommendation is based on a \$2,000 per month penalty for the periods of December 2012 through November 2016. The guidelines the Commission adopted for non-compliance with KLSP obligations provides a monthly penalty range of \$200-\$2,000. Staff believes that TAG intentionally modified the manner in which it offered Lifeline service in Kansas and knowingly shared governmental subsidies with other non-ETC entities instead of passing through the entire

⁶³See Exhibit P, attached.

⁶⁴See Id.

⁶⁵See K.S.A. 66-177; Order Assessing Penalties Against AT&T, ¶ 6, Docket No. 14-GIMT-105-GIT (adopting the following guidelines for noncompliance with KLSP obligations: "(1) the carrier should be required to repay the over-collected monies to the KUSF; (2) each occurrence should be defined as one month, unless the Commission believes the situation warrants a different treatment, with the monthly fines for non-compliance should range from \$250-\$2000; and (3) the Commission would have leeway to increase the fines if the Commission finds: (A) egregious misconduct; (B) the carrier's assets are significant enough that a larger disincentive is necessary; (C) the violation was intentional; (D) the violation resulted in substantial harm; (E) prior violations of Commission requirements; (F) the violation resulted in substantial economic gain; or (G) repeated or continues violation. Similarly, the Commission would have latitude to reduce the fines if it finds: (A) the violations are minor; (B) good faith or voluntary disclosure; (C) a history of overall compliance; or (D) inability to pay.").

federal and state Lifeline credits to subscribers. Furthermore, contrary to its obligations to provide an additional benefit to Kansas subscribers to justify receiving the \$7.77 per month KLSP credit, TAG did not offer any additional benefit.

WHEREFORE, for the reasons set forth above, Staff respectfully moves the Commission to summarily revoke TAG's ETC certification for both federal and state purposes, order TAG to repay all KLSP subsidies collected between November 15, 2012 and November 2015, determine TAG is not eligible to receive the KLSP credits accrued since December 2015, and penalize TAG \$96,000.

Respectfully Submitted,

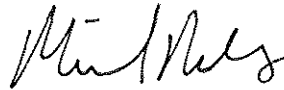


Michael Neeley, S. Ct. #25027
Litigation Counsel
Ahsan Latif, S. Ct. #24709
Litigation Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
Phone: 785-271-3110

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

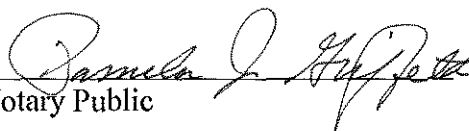
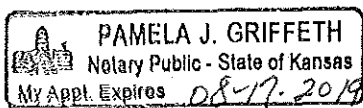
VERIFICATION

Michael Neeley, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Staff's Summary Judgment Motion to Revoke TAG Mobile's ETC Designation; Return KLSP Funds; and Assess Penalties* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Michael Neeley # 25027
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 5th day of December, 2016.


Notary Public

My Appointment Expires: August 17, 2019

**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)	
Commission Should Not Initiate Sanctions and)	Docket No. 16-TAGC-323-SHO
And Fines and Cancel, Suspend, and Revoke Any)	
Authority the Carrier Currently Holds.)	

REDACTED

EXHIBITS

to

Staff's Motion for Summary Judgement

Dated

December 5, 2016

<u>Exhibit</u>	<u># of pages</u>
Confidential Exhibit A	2
Exhibit B	2
Exhibit C	2
Exhibit D	2
Exhibit E	1
Confidential Exhibit F	22
Exhibit G	2
Exhibit H	2
Exhibit I	6
Exhibit J	6
Exhibit K	6
Exhibit L	7
Exhibit M	2
Exhibit N	1
Exhibit O	7
Exhibit P	2
Exhibit Q	2
Confidential Exhibit R	3
Exhibit S	1
Exhibit T	1
Exhibit U	14
Exhibit V	1
Exhibit W	1

Docket No. 16-TAGC-323-SHO
Redacted Exhibit A

Exhibit A, consisting of 2 pages, contains Confidential Information.

**Kansas Corporation Commission
Information Request**

Request No: 2

Company Name TAG Mobile, LLC

TAGC

Docket Number 12-TAGC-843-ETC

Request Date July 24, 2012

Date Information Needed August 7, 2012

RE: ETC Application

Please Provide the Following:

2.1 Does the listing of rate plans in Exhibit G to TAG's Application include ALL rate plans offered in Kansas?

2.2 Can Lifeline customers subscribe to all of TAG's rate plans in Kansas?

2.3 Please provide a listing of the following for each rate plan available in Kansas: a) the monthly rate prior to the application of any Lifeline discounts; b) the monthly rate after applying the federal USF Lifeline discount; and c) the monthly rate after applying the Kansas USF Lifeline discount.

2.4 Please provide a listing of each state in which TAG offers service and the rate plans that are offered in each state. Please include the monthly rate, included minutes, and calling features. Please note if TAG receives federal and/or state Lifeline support in any of the states listed and the monthly rate before and after applying the applicable federal and/or state low-income discounts.

2.5. In its Application, TAG discusses a class 5 cisco switch located in Los Angeles, CA. a) Does TAG own 100% of this switch?; b) Does TAG route all voice telephony traffic through this switch?; c) if TAG does not route all of its voice telephony service through the class 5 switch, please explain how the switch is utilized.

Please see responses attached.

Submitted By Christine Aarnes

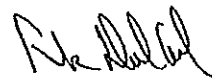
Submitted To Johnson/Gilbreath/Smith

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____



Date: 8/7/12

2.5 In its Application, TAG discusses a class 5 cisco switch located in Los Angeles, CA.

a) Does TAG own 100% of this switch? **Yes. Detailed information, including serial numbers and model numbers for that equipment is available and will be provided to the Commission upon request.**

b) Does TAG route all voice telephony traffic through this switch? **TAG has the capability of determining the types of calls and percentage of calls that will route through its switch. In a full facilities model, such as that which will be employed in Kansas, TAG will route PSTN traffic, international traffic, OS and DA calls directly through its switch (where such practice is applicable and does not limit the subscriber in any way). At this time, TAG plans to continue its policy of routing 911 calls directly from its underlying carriers.**

Kansas Corporation Commission
Information Request

Request No: 3

Company Name TAG Mobile, LLC TAGC
Docket Number 12-TAGC-843-ETC
Request Date July 24, 2012
Date Information Needed August 7, 2012

RE: ETC Application

Please Provide the Following:

3.1 Please provide an explanation of how TAG will provide the following: a) voice grade access to the public switched network or its functional equivalent; b) minutes of use for local service provided at no additional charge to end users; c) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and d) toll limitation services to qualifying low-income consumers.

3.2 TAG states in its Application that it will provide its customers the same ability to remain functional in emergency situations as currently provided by its underlying carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, etc. Please provide specific information indicating how the underlying carrier will ensure it will remain functional in an emergency situation, including how it will ensure functionality without an external power source. Please provide specific information for all underlying carriers.

Please see responses attached.

Submitted By Christine Aarnes

Submitted To Johnson/Gilbreath/Smith

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:  _____

Date: 8/7/12 _____

3.1 Please provide an explanation of how TAG will provide the following:

a) voice grade access to the public switched network or its functional equivalent; TAG provides voice grade access to the PSTN through TAG's Network Operation Center (NOC) located at 8435 Stemmons Freeway, Dallas, Texas. The NOC is on line with TAG's remote Cisco call control/authorization array, and its Cantata Excel network switch, located at the 650 South Grand Avenue, Los Angeles, CA POP hotel. All wireless voice traffic gains network authorization/access from TAG's Call Control & Authorization Platform. This same intelligent calling platform is used to communicate to the Cisco call controller before being passed to the underlying carrier network for call completion. A percentage of all PSTN traffic, as well as all Operator Services, Directory Services and international terminated calling traffic passes through the TAG Mobile Cantata network switch.

**Kansas Corporation Commission
Information Request**

Request No: 4

Company Name TAG Mobile, LLC

TAGC

Docket Number 12-TAGC-843-ETC

Request Date August 16, 2012

Date Information Needed August 31, 2012

RE: ETC Application

Please Provide the Following:

4.1 In response to DR 2.2, TAG indicated that it does not offer the ability to apply the Lifeline discount to all of its service offerings. However, this is an issue of development with TAG's OSS software platform, and TAG is in the process of making modifications to its system to accommodate such an offering. When will the Lifeline discount be available to all of TAG's Lifeline service offerings?

4.2 What percentage of all PSTN traffic passes through TAG's Cantata network switch? What percentage of Kansas PSTN traffic passes through TAG's Cantata network switch?

4.3 TAG's proposed Kansas Lifeline Service Application is not in compliance with the KCC's Lifeline rules and orders. Please review the program-based and income-based eligibility information and provide a revised form that includes the appropriate Kansas Lifeline criteria. (See website for assistance - <http://kcc.ks.gov/pi/lifeline.htm> and/or contact me with questions.)

4.4 TAG's response to 3.2 indicates it will need to request detailed information from its underlying carriers, and will provide this information as soon as it is received. Please provide a date as to when TAG anticipates this information will be available. If currently available, please provide.

Please see responses attached.

Submitted By Christine Aarnes

Submitted To Johnson/Gilbreath/Smith

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____



Date: 8/23/12

4.2 What percentage of all PSTN traffic passes through TAG's Cantata network switch? What percentage of Kansas PSTN traffic passes through TAG's Cantata network switch?

Currently the percentage of PSTN traffic that runs through TAG's switch varies by state based on the requirements of the local Utility Commission. With regard to the appropriate percentage of Kansas PSTN traffic that passes through TAG's switch, in the absence of a determination by the FCC of what percentage of PSTN traffic passing through a carrier's facilities is required to meet the definition of "facilities based", TAG would defer to the recommendation of the Kansas Commission in this regard.

**Kansas Corporation Commission
Information Request**

Request No: 18

Company Name TAG Mobile, LLC

TAGC

Docket Number 16-TAGC-323-SHO

Request Date September 21, 2016

Date Information Needed September 28, 2016

RE:

Please Provide the Following:

From November 2012 to April 2015, did TAG route 100% of its Kansas Lifeline voice traffic through the Class 5 Cisco switch referenced in Docket No. 12-TAGC-843-ETC? No. If yes, please provide proof.

Submitted By Christine Aarnes

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon

Date: 9/30/2016

Docket No. 16-TAGC-323-SHO
Redacted Exhibit F

Exhibit F, consisting of 22 pages, contains Confidential Information.

**Kansas Corporation Commission
Information Request**

Request No: 2

Company Name TAG Mobile, LLC

TAGC

Docket Number 12-TAGC-843-ETC

Request Date July 24, 2012

Date Information Needed August 7, 2012

RE: ETC Application

Please Provide the Following:

- 2.1 Does the listing of rate plans in Exhibit G to TAG's Application include ALL rate plans offered in Kansas?
- 2.2 Can Lifeline customers subscribe to all of TAG's rate plans in Kansas?
- 2.3 Please provide a listing of the following for each rate plan available in Kansas: a) the monthly rate prior to the application of any Lifeline discounts; b) the monthly rate after applying the federal USF Lifeline discount; and c) the monthly rate after applying the Kansas USF Lifeline discount.
- 2.4 Please provide a listing of each state in which TAG offers service and the rate plans that are offered in each state. Please include the monthly rate, included minutes, and calling features. Please note if TAG receives federal and/or state Lifeline support in any of the states listed and the monthly rate before and after applying the applicable federal and/or state low-income discounts.
- 2.5. In its Application, TAG discusses a class 5 cisco switch located in Los Angeles, CA. a) Does TAG own 100% of this switch?; b) Does TAG route all voice telephony traffic through this switch?; c) if TAG does not route all of its voice telephony service through the class 5 switch, please explain how the switch is utilized.

Please see responses attached.

Submitted By Christine Aarnes

Submitted To Johnson/Gilbreath/Smith

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:  _____

Date: 8/7/12 _____

2.1 Does the listing of rate plans in Exhibit G to TAG's Application include ALL rate plans offered in Kansas?

In accordance with TAG's revised FCC Compliance Plan filing made on June 29, 2012, TAG is modifying its Lifeline product offering to include a minimum of 250 free monthly minutes of use rather than the initially proposed 100 free monthly minutes of use. For Kansas, TAG's Lifeline offering will be enhanced to include 500 free monthly minutes of use per month for the Lifeline consumer due to the additional KUSF funding available. In addition, TAG's modified plan will still include text capability, and texts will decrement minutes at a rate of 1 text, either sent or received, to 1 minute of use. Further, for clarification purposes, TAG has removed any references to data services from the Summary Rate Plan document included with its ETC application. Data services are not offered as a component of TAG's Lifeline Service, and while data may be available as part of TAG's replenishment plans, TAG does not provide data capable handsets as part of its Lifeline offering. Please see the revised Summary Rate Plan document attached hereto as Exhibit A. This revised schedule of rates and plans does not include all rate plans and services offered by TAG in Kansas as it does not include the data component of TAG's service offerings.

4. Lifeline

Lifeline, which provides a bill credit to low income consumers, represents the second largest spending category for state universal service funds. Lifeline spending was \$199,257,711 in 2014, down from \$257,254,511 in 2012.³⁵

Eighteen states have specific state Lifeline funds. These states are California, the District of Columbia, Idaho, Kansas, Kentucky, Minnesota, Missouri, Nevada, New Mexico, New York, Nebraska, Oklahoma, Oregon, South Carolina, Vermont, Washington, Wisconsin, and Wyoming,

Utah includes Lifeline in its High Cost Fund rather than maintaining a separate fund. Nebraska has a state Lifeline fund but did not report a figure for expenditures in 2014.

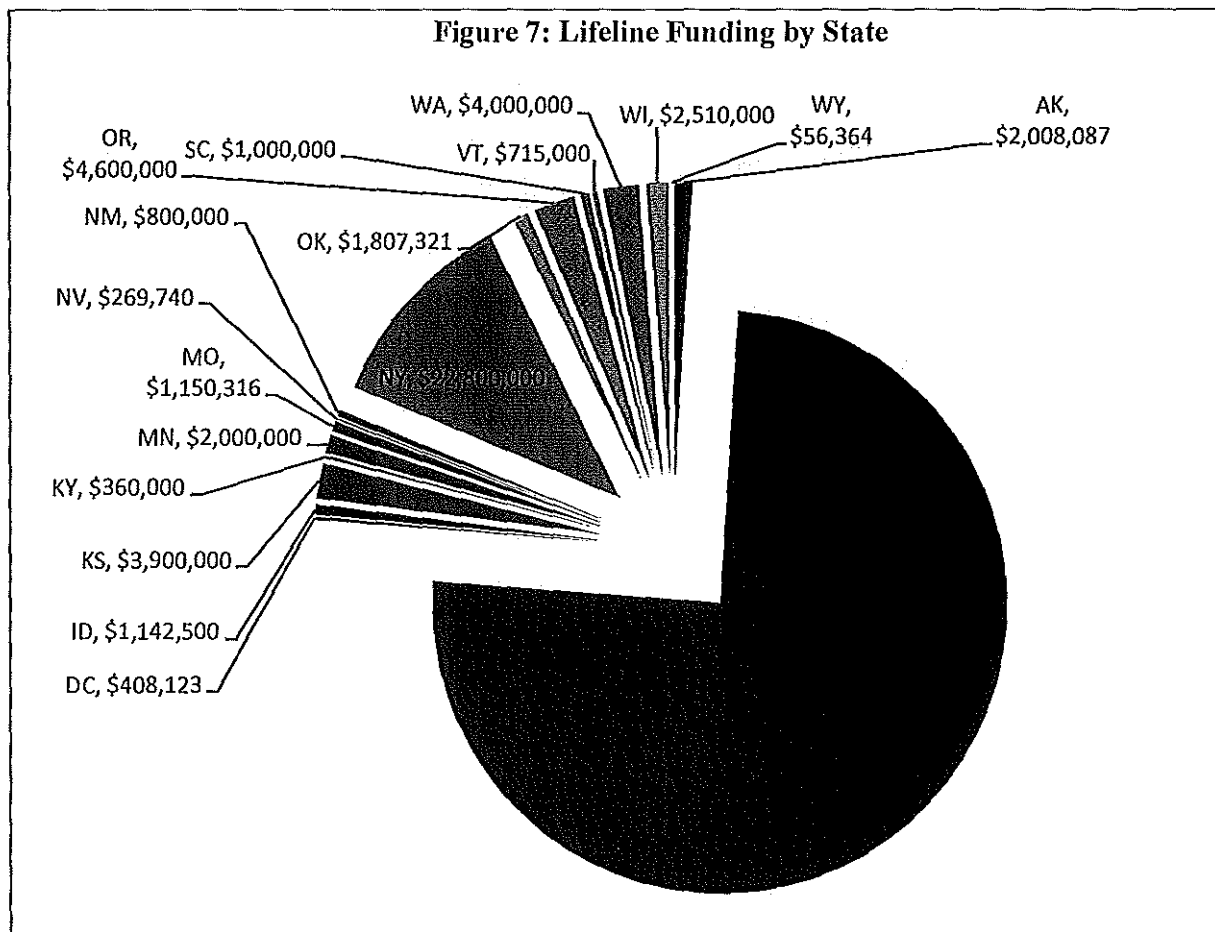
Total Lifeline expenditures have decreased as a result of changes to the Federal Lifeline program to limit fraud and abuse by ensuring that recipients can have only one Lifeline account.

California represents the bulk of Lifeline spending at \$150M, down \$40M from 2012. California expanded its Lifeline program in 2014 to include wireless and some VoIP providers. All local telephone companies that offer residential voice grade telephone in California are required to offer California Universal Lifeline Telephone service. The support amount is capped at \$11.50. This amount is based on the retail price of basic residential telephone less the Federal lifeline subsidy.³⁶

Figure 7 shows Lifeline funding by state.

³⁵ This total includes only those states that reported a dollar value for Lifeline spending. Nebraska and Utah did not report separate spending amounts for Lifeline. Utah includes Lifeline funding in its High Cost Fund.

³⁶ See CPUC Order Modifying Decision (D.) 14-01-036, And Denying Rehearing of Decision, as Modified, available at <http://docs.cpuc.ca.gov/publisheddocs/published/g000/m099/k887/99887806.pdf>



Lifeline expenditures have also decreased as a result of limitations on state funding support and, in some states, fewer program participants.

Idaho reduced its Lifeline funding from \$3.50/month to \$2.50/month in 2014.

In Wyoming increasing declines in the number of consumers participating in the program have reduced the need for State funding. Figure 8 shows the decline in Wyoming's Lifeline participants between 2008 and 2013.³⁷ Wyoming's Lifeline Fund is repealed as of July 1, 2015.³⁸

³⁷ Data provided by Thomas Wilson, Wyoming Public Service Commission

³⁸ Op. cit. Wyoming HB 37

Docket No. 16-TAGC-323-SHO

Exhibit I

Page 1 of 6

24/7 Customer Support 1-866-959-4918

Recertification Hotline 1-866-302-5348



(/LifeLine/LifelineSignUpZipCheck)

Arkansas - The Natural State

Did you know?

- ✓ Arkansas has over 600,000 acres of lakes and 9,700 miles of streams & rivers, and is fittingly called - The Natural State.
- ✓ In Crater of Diamonds State Park - the state has the only active diamond mine in the United States where anyone can search for diamonds and other precious stones!
- ✓ The "Strawn-Wagner Diamond", found in the mine in 1990 is considered to be the first perfect diamond ever found on the Earth. It received a perfect grade of O/O/O by the American Gem Society!

TAG Mobile's Free Lifeline Phone Service is another 'perfect' thing you can find in The Natural State.

It is a government assisted wireless service that provides Free cell phone services to eligible low income families and individuals. The Lifeline Services discounts are offered to qualified Arkansas customers who meet certain eligibility requirements. This includes government assistance or a household income that is at or below 125% of the federal poverty level. Customers can check their eligibility for the program, apply online (Lifeline/Lifelinesignup.zipcheck) and avail the benefits.

TAG Mobile Arkansas Lifeline Services Eligible Customers Receive:

- ✓ FREE Smartphone*
- ✓ 500 FREE minutes every month
- ✓ Unlimited global messaging every month
- ✓ Add Unlimited calling to Mexico (landline & mobile) for \$5

TAG Mobile Arkansas Lifeline Services Plan Benefits:

- ✓ Assured discount every month
- ✓ No Contracts, No Cost
- ✓ Nationwide Coverage
- ✓ Caller ID
- ✓ Call Waiting
- ✓ Voicemail

Eligible Subsidy Programs:

- ✓ Supplemental Nutrition Assistance Program (SNAP)
- ✓ Medicaid (not Medicare)
- ✓ Temporary Assistance for Needy Families (TANF)
- ✓ Section 8 Federal Public Housing Assistance (FPHA)
- ✓ Supplemental Security Income (SSI)
- 24/7 Customer Support 1-866-959-4918
- ✓ Low Income Home Energy Assistance Plan (LIHEAP)
- Recertification Hotline 1-866-302-5348
- ✓ National School Free Lunch Program (NSLP)
- ✓ Transitional Employment Assistance (TEA)
- ✓ Bureau of Indian Affairs General Assistance (BIA)
- ✓ Food Distribution Program on Indian Reservations
- ✓ Tribally-Administered Temporary Assistance for Needy Families (TATANF)
- ✓ Income at or below 135% of federal poverty level

* Smartphones available for online sign-ups only

Start by entering your zip code:

Zip Code

Enter your Email ID

Go

Talk to Us

1-866-959-4918 (Customer Support)

24/7 Customer Support

1-866-216-9576 (Agent Relations)

Live Representatives are available

8:30 AM CST - 12 AM CST: Mon-Fri

9:00 AM CST - 12 AM CST: Sat

9:00 AM CST - 11 PM CST: Sun

Exhibit I

Page 4 of 6

Office:

972-337-5050

Address:

1330 Capital Parkway

Carrollton, TX 75006

~~24/7 Customer Support 1-866-959-4918~~

Recertification Hotline 1-866-302-5348

TAG LIFELINE

My Account

[Add More Minutes \(/Shop/Topup\)](#)[Phones \(/Shop/Shop\)](#)[Add Minutes & Data \(/Shop/Topup\)](#)[Coverage Maps \(/Support/Coverage\)](#)[Switch to Tag Lifeline \(/BringYourPhone/TransferYourNumber\)](#)[International Calling Rates \(/Support/InternationalCallingRates\)](#)

SERVICE AND SUPPORT

[Application Status \(/LifeLine/LifelineApplicationStatus\)](#)[Program Description \(/LifeLine/ProgramDescription\)](#)[Lifeline Forms \(/LifeLine/LifelineForms\)](#)[Lifeline Assistance \(/Support/LifelineAssistanceProgram\)](#)[TAG Lifeline Services \(/Support/TagLifelineServices\)](#)[Re-Certification \(/Recertification/RecertificationFAQs\)](#)[FAQ \(/Support/Faq\)](#)[Sitemap \(/Support/Sitemap\)](#)[Terms and Conditions \(/Support/TermsConditions\)](#)[Privacy Policy \(/Support/PrivacyPolicy\)](#)

Exhibit I

Page 5 of 6

CONTACT US

[About Us \(/Support/Aboutus\)](#)[Contact Information \(/Support/ContactUs\)](#)[Host a Community Event \(/Support/CommunitySignup\)](#)[Become a Dealer \(/Home/BeAnAgent\)](#)[24/7 Customer Support 1-866-959-4918](#)[Re-Certification Hotline 1-866-302-5348](#)

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STATE APPLICATIONS

[Arkansas \(/StatePages/Arkansas-Free-Lifeline-Phones\)](#)[California \(/StatePages/California-Free-Lifeline-Phones\)](#)[Colorado \(/StatePages/Colorado-Free-Lifeline-Phones\)](#)[Iowa \(/StatePages/Iowa-Free-Lifeline-Phones\)](#)[Kentucky \(/StatePages/Kentucky-Free-Lifeline-Phones\)](#)[Louisiana \(/StatePages/Louisiana-Free-Lifeline-Phones\)](#)[Maine \(/StatePages/Maine-Free-Lifeline-Phones\)](#)[Maryland \(/StatePages/Maryland-Free-Lifeline-Phones\)](#)

Exhibit I

Page 6 of 6

Kansas (/StatePages/Kansas-Free-
Lifeline-Phones)

Minnesota (/StatePages/Minnesota-
Free-Lifeline-Phones)

Michigan (/StatePages/Michigan-
Free-Lifeline-Phones)

South Carolina
(/StatePages/SouthCarolina-Free-
Lifeline-Phones)

Missouri (/StatePages/Missouri-Free-
Lifeline-Phones)

24/7 Customer Support 1-866-959-4918 Texas (/StatePages/Texas-Free-
Lifeline-Phones)

Nevada (/StatePages/Nevada-Free-
Lifeline-Phones) Recertification Hotline 1-866-302-5348

Wisconsin (/StatePages/Wisconsin-
Free-Lifeline-Phones)

Oklahoma (/StatePages/Oklahoma-
Free-Lifeline-Phones)

West Virginia

Pennsylvania

(/StatePages/WestVirginia-Free-
Lifeline-Phones)

(/StatePages/Pennsylvania-Free-
Lifeline-Phones)

-- Select City -- ☐



(<https://www.instagram.com/taglifeline/>)



(<https://www.pinterest.com/tagmobile>)



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Docket No. 16-TAGC-323-SHO

Exhibit J

Page 1 of 6



(/LifeLine/LifelineSignUpZipCheck)

Lifeline Phones in Colorado

"Mike the Headless Chick"

In the 1940's, farmer Lloyd Olsen was so concerned to keep his chickens safe from predators that he would leave as much of the neck as possible on the chicken, as tightly as he could. However, because of this, the chicken continued to "peck" for food as if it were still alive. Mike, started feeding the chicken with a headless chicken. Mike, lived for 18 months after his head was removed.

You don't have to live with a headless chicken. TAG Mobile is here to help.



Colorado Lifeline Services is a government assisted wireless service that provides discounted home phone and cell phone services to eligible low income families and individuals. Colorado Lifeline Services discounts are offered to qualified Colorado customers who meet certain eligibility requirements such as, government assistance or a household income that is at or below 150% of the federal poverty level. Customers can check their Eligibility for the Program, apply online (/LifeLine/LifelineSignUpZipCheck) and avail the benefits, along with Discounts and Offers.

As per Program guidelines, the Lifeline service is limited to one per household and cannot be combined with any other Lifeline offering. Each household must choose to get the discount either on a home phone or on a cell phone, but not on both.

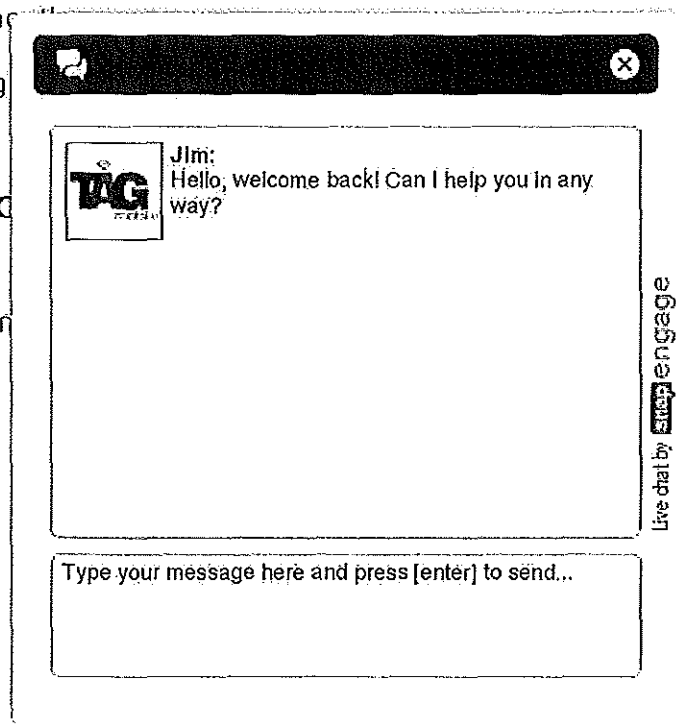
Select your prepaid plan that fits your need and requirement. There several prepaid plans available under TAG Mobile Colorado Lifeline Services. You can change your plan every month to fit your lifestyle or you can add minutes anytime at your convenience. For more details, please contact us or have your queries answered here (/Support/Faq) (FAQs).

TAG Mobile Colorado Lifeline Services Eligible Customers Receive:

- ✓ FREE Smartphone*
- ✓ 500 FREE minutes every month
- ✓ Unlimited global messaging

TAG Mobile Colorado Benefits:



- ✓ Assured discount every month
- ✓ No Contracts, No Cost
- ✓ Nationwide Coverage
- ✓ Caller ID
- ✓ Call Waiting
- ✓ Voicemail



Eligible Subsidy Programs:

- ✓ Supplemental Nutrition Assistance Program (SNAP)
- ✓ Medicaid (not Medicare)
- ✓ Colorado Works, Temporary Assistance for Needy Families (TANF)
- ✓ Section 8 Federal Public Housing Assistance (FPHA)
- ✓ Supplemental Security Income (SSI)
- ✓ Low Income Home Energy Assistance Plan (LIHEAP)
- ✓ National School Free Lunch Program (NSLP)
- ✓ Head Start (meeting income qualifying standards)
- ✓ Bureau of Indian Affairs General Assistance (BIA)
- ✓ Tribally Administered Temporary Assistance for Needy Families (TATANF)
- ✓ Food Distribution Program on Indian Reservations (FDPIR)
- ✓ Income at or below 135% of federal poverty level

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<p>Start by entering your zip code:</p> <div>Zip Code</div> <div>Enter your Email ID</div> <div>Go</div> <p>Talk to Us</p> <p>1-866-959-4918 (Customer Support) 24/7 Customer Support</p> <p>1-866-216-9576 (Agent Relations)</p>	<div><p>Jim: Hello, welcome back! Can I help you in any way?</p></div> <div>Type your message here and press [enter] to send...</div> <div>Live chat by  engage</div>
--	--

Live Representatives are available
8:30 AM CST - 12 AM CST: Mon-Fri
9:00 AM CST - 12 AM CST: Sat
9:00 AM CST - 11 PM CST: Sun

Office:

972-337-5050

Address:

1330 Capital Parkway
Carrollton, TX 75006

TAG LIFELINE

My Account

Add More Minutes (/Shop/Topup)

Phones (/Shop/Shop)

Add Minutes & Data (/Shop/Topup)

Coverage Maps (/Support/Coverage)

Switch to Tag Lifeline (/BringYourP)

International Calling Rates (/Support)

SERVICE AND SUPPORT

Application Status (/LifeLine/Lifeline)

Program Description (/LifeLine/Prog)

Lifeline Forms (/LifeLine/LifelineFo)

Lifeline Assistance (/Support/Lifelin)

TAG Lifeline Services (/Support/Tag)

Re-Certification (/Recertification/Re

Jim:
Hello, welcome back! Can I help you in any way?

Type your message here and press [enter] to send...

Live chat by snapengage

[FAQ \(/Support/Faq\)](#)

[Sitemap \(/Support/Sitemap\)](#)

[Terms and Conditions \(/Support/TermsConditions\)](#)

[Privacy Policy \(/Support/PrivacyPolicy\)](#)

CONTACT US

[About Us \(/Support/Aboutus\)](#)

[Contact Information \(/Support/ContactUs\)](#)

[Host a Community Event \(/Support/CommunitySignup\)](#)

[Become a Dealer \(/Home/BeAnAgent\)](#)

Customer Service: 1-866-959-4918

Re-Certification: 1-866-302-5348

Subscribe Now for Newsletters and Updates in TAG Mobile

Email Address*

Sub

Jim: Hello, welcome back! Can I help you in any way?

Type your message here and press [enter] to send...

Live chat by snapengage

STATE APPLICATIONS

[Arkansas \(/StatePages/Arkansas-Free-Lifeline-Phones\)](#)

California (/StatePages/California-Free-Lifeline-Phones)

Colorado (/StatePages/Colorado-Free-Lifeline-Phones)

Iowa (/StatePages/Iowa-Free-Lifeline-Phones)

Kansas (/StatePages/Kansas-Free-Lifeline-Phones)

Michigan (/StatePages/Michigan-Free-Lifeline-Phones)

Missouri (/StatePages/Missouri-Free-Lifeline-Phones)

Nevada (/StatePages/Nevada-Free-Lifeline-Phones)

Oklahoma (/StatePages/Oklahoma-Free-Lifeline-Phones)

Pennsylvania
(/StatePages/Pennsylvania-Free-Lifeline-Phones)

Louisiana (/StatePages/Louisiana-Free-Lifeline-Phones)

Maine (/StatePages/Maine-Free-Lifeline-Phones)

Maryland (/StatePages/Maryland-Free-Lifeline-Phones)

Minnesota (/StatePages/Minnesota-Free-Lifeline-Phones)

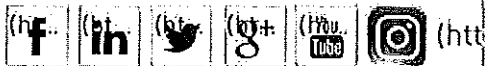
South Carolina
(/StatePages/SouthCarolina-Free-Lifeline-Phones)

Texas (/StatePages/Texas-Free-Lifeline-Phones)

Wisconsin (/StatePages/Wisconsin-Free-Lifeline-Phones)

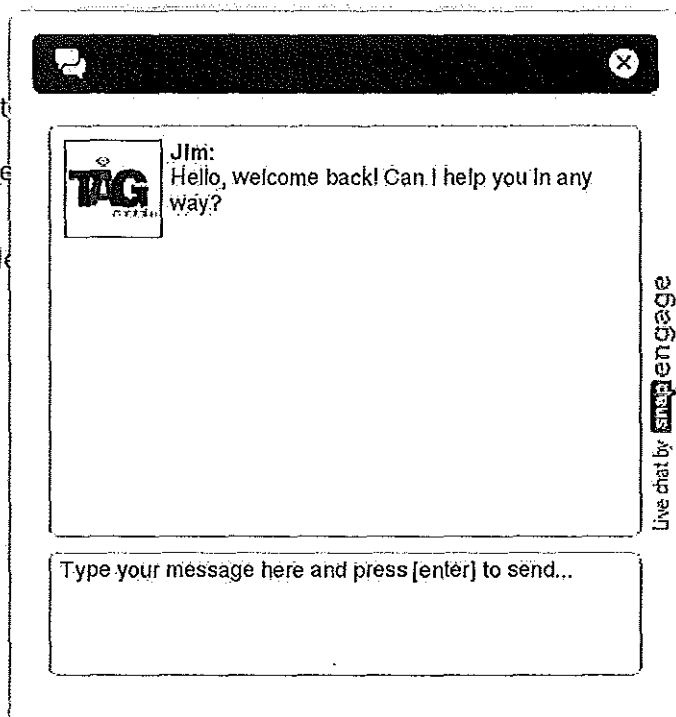
West Virginia
(/StatePages/WestVirginia-Free-Lifeline-Phones)

-- Select City--



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24/7 Customer Support 1-866-959-4918

Recertification Hotline 1-866-302-5348



(/LifeLine/LifelineSignUpZipCheck)

Free Lifeline Phones in IOWA

Did you know?

- ✓ Iowa is the only state whose name starts with two vowels.
- ✓ Iowa's state flower, the wild rose, has been around for 35 million years and is used as a medicine.
- ✓ Iowa lays claim to the world's largest wooden nickel, which sits, spanning 12 feet across, in an Iowa City farm field.
- ✓ The largest cave in Iowa is Coldwater Cave which spans 16 miles.
- ✓ The shortest and steepest railroad in the world is in Dubuque.

Iowa Lifeline Services is a government-assisted wireless service that offers cheap home phone and cell phone services to qualified low income families and individuals. Iowa Lifeline Services discounts are offered to eligible Iowan customers who meet certain eligibility requirements such as, government assistance or a household income that is at or below 135% of the federal poverty level. An individual can find out his or her eligibility to get benefits of the program and apply online. (/LifeLine/LifelineSignUpZipCheck) TAG Mobile 24/7 Customer Support 1-866-959-4916 offers unlimited plans to fit your requirements. For more details, please contact us or have your queries answered (FAQs). Recertification Hotline 1-866-302-5348 (/Support/Faq)

TAG Mobile Iowa Lifeline Services Eligible Customers Receive:

- ✓ FREE Smartphone*
- ✓ 500 FREE minutes every month
- ✓ Unlimited global messaging every month

TAG Mobile Colorado Lifeline Services Plan Benefits:

- ✓ Assured discount every month
- ✓ No Contracts, No Cost
- ✓ Nationwide Coverage
- ✓ Caller ID
- ✓ Call Waiting
- ✓ Voicemail

Eligible Subsidy Programs:

- ✓ Supplemental Nutrition Assistance Program (SNAP)
- ✓ Medicaid / MediPASS (not Medicare)
- ✓ Temporary Assistance for Needy Families (TANF)
- ✓ Food Distribution Program on Indian Reservations (FDPIR)

- ✓ Section 8 Federal Public Housing Assistance (FPHA)
- ✓ Supplemental Security Income (SSI)
- ✓ Bureau of Indian Affairs General Assistance (BIA)
- ✓ Tribally-Administered Temporary Assistance for Needy Families (TATANF)

24/7 Customer Support 1-866-959-4918

Recertification Hotline 1-866-302-5348

- ✓ Low Income Home Energy Assistance Plan (LIHEAP)
- ✓ National School Free Lunch Program (NSLP)
- ✓ Head Start (meeting income qualifying standards)
- ✓ Income at or below 135% of federal poverty level

* Smartphones available for online sign-ups only

Start by entering your zip code:

Zip Code

Enter your Email ID

Go

Talk to Us

1-866-959-4918 (Customer Support)

24/7 Customer Support

1-866-216-9576 (Agent Relations)

Live Representatives are available

8:30 AM CST - 12 AM CST; Mon-Fri

9:00 AM CST - 12 AM CST; Sat

9:00 AM CST - 11 PM CST; Sun

Office:

972-337-5050

Address:

1330 Capital Parkway
Carrollton, TX 75006

24/7 Customer Support 1-866-959-4918

TAG LIFELINE
Recertification Hotline 1-866-302-5348

My Account

Add More Minutes (/Shop/Topup)

Phones (/Shop/Shop)

Add Minutes & Data (/Shop/Topup)

Coverage Maps (/Support/Coverage)

Switch to Tag Lifeline (/BringYourPhone/TransferYourNumber)

International Calling Rates (/Support/InternationalCallingRates)

SERVICE AND SUPPORT

Application Status (/LifeLine/LifelineApplicationStatus)

Program Description (/LifeLine/ProgramDescription)

Lifeline Forms (/LifeLine/LifelineForms)

Lifeline Assistance (/Support/LifelineAssistanceProgram)

TAG Lifeline Services (/Support/TagLifelineServices)

Re-Certification (/Recertification/RecertificationFAQs)

FAQ (/Support/Faq)

Sitemap (/Support/Sitemap)

Terms and Conditions (/Support/TermsConditions)

Privacy Policy (/Support/PrivacyPolicy)

CONTACT US

[About Us \(/Support/Aboutus\)](#)

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[Host a Community Event \(/Support/CommunitySignup\)](#)

[Become a Dealer \(/Home/BeAnAgent\)](#)

Customer Service: 1-866-959-4918

Re-Certification: 1-866-302-5348

24/7 Customer Support 1-866-959-4918

Recertification Hotline 1-866-302-5348

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STATE APPLICATIONS

[Arkansas \(/StatePages/Arkansas-Free-Lifeline-Phones\)](#)

[California \(/StatePages/California-Free-Lifeline-Phones\)](#)

[Colorado \(/StatePages/Colorado-Free-Lifeline-Phones\)](#)

[Iowa \(/StatePages/Iowa-Free-Lifeline-Phones\)](#)

[Kansas \(/StatePages/Kansas-Free-Lifeline-Phones\)](#)

[Kentucky \(/StatePages/Kentucky-Free-Lifeline-Phones\)](#)

[Louisiana \(/StatePages/Louisiana-Free-Lifeline-Phones\)](#)

[Maine \(/StatePages/Maine-Free-Lifeline-Phones\)](#)

[Maryland \(/StatePages/Maryland-Free-Lifeline-Phones\)](#)

[Minnesota \(/StatePages/Minnesota-Free-Lifeline-Phones\)](#)

Michigan (/StatePages/Michigan-Free-Lifeline-Phones)

Missouri (/StatePages/Missouri-Free-Lifeline-Phones)

Nevada (/StatePages/Nevada-Free-Lifeline-Phones)

24/7 Customer Support 1-866-959-4918

Oklahoma (/StatePages/Oklahoma-Free-Lifeline-Phones)

Free-Lifeline-Phones 1-866-302-5348

Pennsylvania

(/StatePages/Pennsylvania-Free-Lifeline-Phones)

South Carolina

(/StatePages/SouthCarolina-Free-Lifeline-Phones)

Texas (/StatePages/Texas-Free-Lifeline-Phones)

Wisconsin (/StatePages/Wisconsin-Free-Lifeline-Phones)

West Virginia

(/StatePages/WestVirginia-Free-Lifeline-Phones)

-- Select City --



(<https://www.instagram.com/taglifeline/>)



(<https://www.pinterest.com/tagmobile>)



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Docket No. 16-TAGC-323-SHO

Exhibit L

Page 1 of 7

24/7 Customer Support 1-866-959-4918 Recertification Hotline
1-866-302-5348



(/LifeLine/LifelineSignUpZipCheck)

Free Lifeline Phones in Kansas

What Kansas has given the world:

- ✓ The first Pizza Hut restaurants opened in Wichita.
- ✓ University of Kansas discovered Helium in 1905.
- ✓ William Purvis and Charles Wilson of Goodland, invented the helicopter in 1909.
- ✓ Almon Stowger of El Dorado invented the dial telephone in 1889.
- ✓ Amelia Earhart, the first woman granted a pilot's license by the National Aeronautics Associate

- ✓ The first woman to fly solo across the Atlantic Ocean was from Atchison,

What TAG Mobile and the Kansas Lifeline Service is giving back to people of Kansas:

Kansas Lifeline Services is a government assisted wireless service that provides discounted home phone and cell phone services to eligible low income families and individuals. Kansas Lifeline Services discounts are offered to qualified Kansas customers who meet certain eligibility requirements such as, government assistance or a household income that is at or below 150% of the federal poverty level. Customers can check their Eligibility for the Program, apply online (/LifeLine/LifelineSignUpZipCheck) and avail the benefits, along with Discounts and Offers.

Qualified customers receive a free cell phone along with free minutes and free texts every month. The Kansas Lifeline discounts help consumers lower the cost of their phone bills. As per Program guidelines, the Lifeline service is limited to one per household and cannot be combined with any other Lifeline offering. Each household must choose to get the discount either on a home phone or on a cell phone, but not on both.

TAG Mobile Kansas Lifeline Services offers a variety of flexible prepaid plans to fit your needs. Whether you talk a little or talk a lot, we have a plan for everyone. You can change your plan every month to fit your lifestyle or you can add minutes anytime at your convenience. For more details, please contact us or have your queries answered here (/Support/Faq) (FAQs).

TAG Mobile Kansas Lifeline Services Eligible Customers Receive:

- ✓ FREE Smartphone*
- ✓ 500 FREE minutes every month
- ✓ Unlimited global messaging every month

TAG Mobile Kansas Lifeline Services Plan Benefits:

- ✓ Assured discount every month
- ✓ No Contracts, No Cost

- ✓ Nationwide Coverage
- ✓ Caller ID
- ✓ Call Waiting
- ✓ Voicemail

24/7 Customer Support 1-866-959-4918 Recertification Hotline
Eligible Subsidy Programs: 1-866-302-5348

- ✓ Supplemental Nutrition Assistance Program (SNAP)
- ✓ Medicaid (not Medicare)
- ✓ Temporary Assistance for Needy Families (TANF)
- ✓ Food Distribution Program
- ✓ Food Distribution Program on Tribal Lands
- ✓ Section 8 Federal Public Housing Assistance (FPHA)
- ✓ Supplemental Security Income (SSI)
- ✓ Low Income Home Energy Assistance Plan (LIHEAP)
- ✓ National School Free Lunch Program (NSLP)
- ✓ Tribally Administered Free School Lunch Program (TASLP)
- ✓ Head Start (meeting income qualifying standards)
- ✓ Bureau of Indian Affairs General Assistance (BIA)
- ✓ Tribally Administered Temporary Assistance for Needy Families (TATANF)
- ✓ General Assistance
- ✓ Income at or below 150% of federal poverty level

* Smartphones available for online sign-ups only

Start by entering your zip code:

24/7 Customer Support 1-866-959-4918 Recertification Hotline

1-866-302-5348

Talk to Us

1-866-959-4918 (Customer Support)

24/7 Customer Support

1-866-216-9576 (Agent Relations)

Live Representatives are available

8:30 AM CST - 12 AM CST: Mon-Fri

9:00 AM CST - 12 AM CST: Sat

9:00 AM CST - 11 PM CST: Sun

Office:

972-337-5050

Address:

1330 Capital Parkway

Carrollton, TX 75006

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[International Calling Rates \(/Support/InternationalCallingRates\)](#)

SERVICE AND SUPPORT

[Application Status \(/LifeLine/LifelineApplicationStatus\)](#)

[Program Description \(/LifeLine/ProgramDescription\)](#)

[Lifeline Forms \(/LifeLine/LifelineForms\)](#)

[24/7 Customer Support 1-866-959-4918](#)

[Recertification Hotline Lifeline Assistance \(/Support/LifelineAssistanceProgram\)](#)

[TAG Lifeline Services \(/Support/TagLifelineServices\)](#)

[Re-Certification \(/Recertification/RecertificationFAQs\)](#)

[FAQ \(/Support/Faq\)](#)

[Sitemap \(/Support/Sitemap\)](#)

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Re-Certification: 1-866-302-5348

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Email Address*

Subscribe Now

STATE APPLICATIONS

24/7 Customer Support 1-866-959-4918 Recertification Hotline

Arkansas (/StatePages/Arkansas-Free-Lifeline-Phones)

Kentucky (/StatePages/Kentucky-Free-Lifeline-Phones)

California (/StatePages/California-Free-Lifeline-Phones)

Louisiana (/StatePages/Louisiana-Free-Lifeline-Phones)

Colorado (/StatePages/Colorado-Free-Lifeline-Phones)

Maine (/StatePages/Maine-Free-Lifeline-Phones)

Iowa (/StatePages/Iowa-Free-Lifeline-Phones)

Maryland (/StatePages/Maryland-Free-Lifeline-Phones)

Kansas (/StatePages/Kansas-Free-Lifeline-Phones)

Minnesota (/StatePages/Minnesota-Free-Lifeline-Phones)

Michigan (/StatePages/Michigan-Free-Lifeline-Phones)

South Carolina (/StatePages/SouthCarolina-Free-Lifeline-Phones)

Missouri (/StatePages/Missouri-Free-Lifeline-Phones)

Texas (/StatePages/Texas-Free-Lifeline-Phones)

Nevada (/StatePages/Nevada-Free-Lifeline-Phones)

Wisconsin (/StatePages/Wisconsin-Free-Lifeline-Phones)

Oklahoma (/StatePages/Oklahoma-Free-Lifeline-Phones)

West Virginia

Pennsylvania

(/StatePages/WestVirginia-Free-Lifeline-Phones)

(/StatePages/Pennsylvania-Free-Lifeline-Phones)

-- Select City --



(https://www.instagram.com/taglifeline/)



(https://www.pinterest.com/tagmobile)



24/7 Customer Support 1-866-959-4918 Recertification Hotline
1-866-302-5348

**Kansas Corporation Commission
Information Request**

Request No: 13

Company Name TAG Mobile, LLC

TAGC

Docket Number 16-TAGC-323-SHO

Request Date July 28, 2016

Date Information Needed August 5, 2016

RE: UPDATED RESPONSE 10/26/2016

Please Provide the Following:

13: Please utilize Attachment B for this Request. For each month since TAG received ETC Lifeline designation in Kansas (Nov. 2012), complete the columns for each month as follows:

- (a) verify the number of lines reported for Kansas Lifeline Service Program purposes;
- (b) the number of Lifeline connections provided through TAG's ISO Agreement with Selectel;
- (c) the number of Lifeline connections provided through TAG's Joint Venture Agreement with Selectel;
- (d) the total number of Lifeline connections provided by Selectel;
- (e, f, and g) the number of Lifeline connections provided through each Other Agreement. Please add additional columns, if necessary;
- (h) the total number of Lifeline connections provided through Other Agreements;
- (i) the number of Lifeline connections provided directly by TAG;

Please list the name of each provider included in the "Other Agreements" columns (e, f and g) in Row 2.

TAG's UPDATED RESPONSE: Per our discussion on 10/20 the Other Agreements were provided Lifeline connections directly through TAG Mobile. The Other Agreements "header" has been edited to reflect this fact. See revised Attachment B.

Submitted By Christine Aarnes

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon
Date: 10/26/16

Month	Selectel				Other Agreements Directly Provided by TAG														TAG					
	KLSP Lines	ISO	Jt. Venture	Total	Peter	Expert	TEAM	America	New	K & B	On	Worl	Futur		Life	Total	Directly							
					Absolu	Sirianni	Comm	Marketi	n	World	Comm	The	dfon	Wayn				e						
	a	b	c	d = (a+b)	m	Uconne	Rentals	Market	INC.	y	n	ons	LLC	nications	Service	Go	d	al	m	LLC	PTM	Link	h = (e+f+g)	i = (a-d-h)
November-12				-																				
December-12				-																				
January-13	82	0	0	-	1	70	1																72	10
February-13	97	0	0	-	5	79	1																85	12
March-13	462	0	0	-	17	365	1	44	3														430	32
April-13	3,592	0	0	-	26	545	1	65	1,004	1,739													3,380	212
May-13	4,719	0	0	-	31	533	1	64	1,979	1,872													4,480	239
June-13	6,855	0	0	-	36	530	1	64	4,093	1,859													6,583	272
July-13	8,520	0	0	-	40	364	1	61	6,086	1,677													8,229	291
August-13	8,864	0	0	-	41	115		61	7,894	500													8,611	253
September-13	8,006	0	0	-	38	115		36	7,058	497													7,744	262
October-13	7,349	0	0	-	40	110		33	6,423	482													7,088	261
November-13	6,290	0	0	-	42	102		28	5,450	417													6,039	251
December-13	5,512	0	0	-	40	86		27	4,743	356													5,252	260
January-14	4,778	0	0	-	36	75		25	4,090	300	1												4,527	251
February-14	4,324	0	0	-	34	65		22	3,579	258	1	120											4,079	245
March-14	4,346	0	0	-	34	65		22	3,578	258	1	141	5										4,104	242
April-14	3,732	0	0	-	32	58		17	2,959	221	1	165	36	1	14								3,504	228
May-14	3,472	0	0	-	32	55		15	2,644	202	1	150	40	1	110								3,250	222
June-14	3,222	0	0	-	32	53		14	2,411	184	1	136	40		139	1							3,011	211
July-14	2,997	0	0	-	30	53		14	2,195	159	1	123	34		180	1							2,790	207
August-14	2,456	0	0	-	23	40		11	1,707	101	1	107	31		273	1							2,295	161
September-14	2,260	0	0	-	21	39		11	1,551	92	1	95	31		268	1	3						2,113	147
October-14	2,079	0	0	-	20	37		11	1,408	83	1	88	28		252	1	7						1,936	143
November-14	1,958	0	0	-	20	34		11	1,309	75	1	87	25		249		9						1,820	138
December-14	1,875	0	0	-	20	34		11	1,267	73	1	67	23		236		12	1					1,745	130
January-15	1,176	0	0	-	4	27		2	689	47		60	21		227		12	1					1,090	86
February-15	1,164	0	0	-	3	27		2	683	46		59	21		223		11	1					1,076	88
March-15	1,076	0	0	-	3	23		2	617	39		54	20		220		10	1					989	87
April-15	1,080	180	0	180	2	22		2	535	34		49	18		150		8	1					821	79
May-15	1,263	409	0	409	3	22		2	500	30		46	17		144		6	1					771	83
June-15	1,276	436	0	436	3	19		2	489	28		46	17		144		6	1					755	85
July-15	2,402	1938	0	1,938	2	13		1	368	20		4	4		11								423	41
August-15	3,189	2758	0	2,758	2	11		1	346	14		2	3		9								388	43
September-15	3,229	2793	0	2,793	2	11		1	346	14		2	3		9				1				389	47
October-15	3,230	2788	0	2,788	2	11		1	346	14		2	3		9				1				389	53
November-15	4,341	3705	195	3,900	1	3			372			2	3		8				1				390	51
December-15	4,148	3500	245	3,745	1	2			345			2	3		7								360	43
January-16	3,302	2727	477	3,204	1	1			61														63	35
February-16	3,175	2691	386	3,077		1			52														53	45
March-16	3,045	2603	370	2,973		1			7												1		9	63
April-16	2,413	1990	355	2,345		1			7												1		9	59
May-16	2,255	1854	324	2,178		1			7												1		9	68
June-16	2,138	1748	309	2,057		1			7												1		9	72
July-16	1,998	1615	300	1,915		1			7														8	75

**Kansas Corporation Commission
Information Request**

Request No: 7

Company Name TAG Mobile, LLC TAGC
Docket Number 16-TAGC-323-SHO
Request Date March 5, 2016
Date Information Needed March 14, 2016

RE:

Please Provide the Following:

7. Does TAG have or ever had an agreement (ISO, Joint Venture or other) with any provider other than Selectel? If so, please provide a copy of each agreement.

RESPONSE: There were two other ISO Agreements which are no longer active. See attached.

Submitted By Christine Aarnes

Submitted To

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Caldon

Date: 3/18/2016

KUSF Carrier Audit Information Request

Submitted By: David Winter
Submitted To: TAG Mobile, LLC
Company Name: Queen Zhang
Docket Number: 17-TAGC-029-KSF
Request Date: August 9, 2016
Date Information Needed: September 8, 2016

Request No. 5

RE: Miscellaneous Supporting Documentation

A. Please provide copies of the following:

1. Internal KUSF reporting policies or instructions, including how the Company identifies and reports revenues related to Lifeline subscribers, discounts, and promotional service rates.

TAG's RESPONSE: See Data Request 4: A 4 for policy and instructions on how KUSF is identified and reported for lifeline subscribers.

3. Copies of Kansas tariff pages that pertain to the KUSF assessment in effect during the 3 review months, if applicable.

TAG's RESPONSE: Tariffs are not applicable to Wireless ETCs however Summary Rate Plans are filed with the KCC at the time the ETC Application is filed. During the 3 review months we offered 500 minutes and 500 text messages in May & Aug 2015. Unfortunately a new Summary Rate Plan was not filed to reflect this change from what was in the original application. For January 2016, TAG offered 500 minutes and unlimited text messaging. The Summary Rate Plan that reflects this change was filed on 12/14/15. See **Exhibit D** for the last Summary Rate plan filed and in effect on Jan '16.

3. Ten (10) Residential and ten (10) Business customer bills or billing images for each of the 3 selected review months (total of 60). Please include bills that reflect both interstate and intrastate jurisdictional charges if your company offers both intrastate and interstate (e.g. local and long-distance) services. Of the (10) Residential and ten (10) Business customer bills or billing images for each of the three (3) selected review months, select one (1) residential and one (1) business customer per month and demonstrate how the KUSF surcharge collected from the customer was calculated.

TAG's RESPONSE: As previously mentioned, TAG Mobile is a prepaid mobile service provider and does not render bills therefore there are no bills to provide as examples.

4. A detailed explanation of the line items shown on the customers' invoices that are used to calculate the KUSF surcharge shown on the invoice.

TAG's RESPONSE: Not applicable per response on #3 above.

Note: Please use sample bills provided in response to subpart 3 above to illustrate the calculation of the KUSF surcharge.

Request No. 5 (continued)

Verification of Response

I have read the foregoing Data Request and response thereto and find such response to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: Mary Calderon

Date: 10/17/2016

KUSF- Data Request 5-3

January 2016

VCare Account: 1939661

MDN: 3 [REDACTED]

Search Customer			
Find Customer By: Telephone		Search For: [REDACTED]	
Customer ID: 1939661		MDN: [REDACTED]	
Enrollment ID: ATGS4174		ESN/SM #: 26841540911537630	
Recent/Action Required		Agent Name: Corey Coleman (10159-coleman)	
		Company: TGM	
		Master Agent Name: Selectal Inc.	
		Current: Telling	
<div> <div>Live status</div> <div> <div>Customer</div> <div> <div>Info</div> <div> <div>Wichita KS 67212</div> <div>Billing/Shipping Address:</div> <div>DOB (yy-mm-dd):</div> <div>Alternative Contact: Add Contact</div> <div>Email Address:</div> <div>Current Account Balance: \$0.00</div> </div> </div> <div> <div>Plan Details</div> <div> <div>Current Plan: Kansas 500 voice and unlimited international messaging</div> <div>Plan Price: \$12.75</div> </div> </div> </div> <div> <div>Line Features</div> <div> <div>KS Federal Lifeline Discount: -\$9.25</div> <div>KS Company Contribution: -\$3.50</div> <div>Latest Notes:</div> <div> <div>1. SUSanna Stay Connected? 2016-Oct-17 11:30:30</div> <div>2. SMS/Keep your service active 2016-Sep-19 11:31:27</div> <div>3. SMS/anna Stay Connected 2016-Sep-09 11:35:33</div> <div>4. KS RTR Approval, View KS SNA... 2015-Nov-02 17:07:34</div> <div>5. VCARE order approved by auto... 2015-Nov-02 12:43:45</div> <div>History:</div> <div>1. Account status changes from DL... 2015-11-02 12:43:45</div> </div> </div> <div> <div>General</div> <div> <div>Account Type: Lifeline</div> <div>VCARE Account Status: Active</div> <div>Account Password:</div> <div>Secret Q&A:</div> <div>Add Security Question</div> <div>Address Type: Permanent</div> <div>Device ID:</div> <div>Application Approval Date: 2015-Nov-02</div> <div>Lifeline Activation Date: N/A</div> <div>Xerox Approval Date: 2015-Nov-02</div> <div>Xerox Last Status: Approved</div> <div>Disconnection Reason: N/A</div> <div>Lifeline Program Participation:</div> <div>1) Supplemental Nutrition Assistance Program (SNAP)</div> <div>Medicaid Program or Income Base</div> <div>Household: N</div> <div>Eligible Flag: N</div> <div>Proof of Eligibility (Last 4 digits): 5395</div> </div> </div> </div> </div>			

VCare Account: 1858063

MDN: 316-218-2471

Search Customer			
Find Customer By: Telephone		Search For: [REDACTED]	
Customer ID: 1858063		MDN: [REDACTED]	
Enrollment ID: BNA551792109		ESN/SM #: [REDACTED]	
Recent/Action Required		Company: TGM	
		Current: Telling	
<div> <div>Live status</div> <div> <div>Customer</div> <div> <div>Info</div> <div> <div>Wichita KS 67219</div> <div>Billing/Shipping Address:</div> <div>DOB (yy-mm-dd):</div> <div>Alternative Contact: Add Contact</div> <div>Email Address:</div> <div>Current Account Balance: \$0.00</div> </div> </div> <div> <div>Plan Details</div> <div> <div>Current Plan: Kansas 500 voice and unlimited international messaging</div> <div>Plan Price: \$12.75</div> </div> </div> </div> <div> <div>Line Features</div> <div> <div>KS Federal Lifeline Discount: -\$9.25</div> <div>KS Company Contribution: -\$3.50</div> <div>Latest Notes:</div> <div> <div>1. Proceed Request To Change Acro... 2016-Apr-25 15:20:50</div> <div>History:</div> <div>1. Proceed Request To Change Acro... 2016-Apr-26 15:20:50</div> </div> </div> <div> <div>General</div> <div> <div>Account Type: Lifeline</div> <div>VCARE Account Status: Active</div> <div>Account Password:</div> <div>Secret Q&A:</div> <div>Add Security Question</div> <div>Address Type: Permanent</div> <div>Device ID:</div> <div>Application Approval Date: 2015-Apr-24</div> <div>Lifeline Activation Date: 2015-Apr-24</div> <div>Disconnection Date: 2016-Apr-26</div> <div>Disconnection Reason: Not Usage</div> <div>Lifeline Program Participation:</div> <div>1) Medicaid (not Medicaid)</div> <div>Medicaid Program or Income Base</div> <div>Household: Y</div> <div>Eligible Flag: N</div> <div>Proof of Eligibility (Last 4 digits):</div> </div> </div> </div> </div>			

VCare Account: 1853181

MDN: [REDACTED]

Search Customer

Find Customer By: **Telephone** Search For: [REDACTED] **Search** **Advance Search**

Customer ID: 1853181 MDN: [REDACTED] **Add purchase** **Data Patch** **Bill Pay** **Equip Patch**

Enrollment ID: RAS58721264 ESN/SM #: [REDACTED] Company: TGM Carrier: 1853181

Recertification Required: **Live Status**

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
Info Wichita KS 67218 Billing Shipping Address: [REDACTED] SSN (Last 4): [REDACTED] DOB (yy/mm/dd): [REDACTED] Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: 0.00 Plan Details Current: Kansas 500 voice and unlimited international Plan: messaging Price: \$12.75	Line Features KS Federal Lifeline Discount: - \$9.25 KS Company Contribution: - \$3.50 Latest 5 Notes: 1. CGM MDN inactive 3162102478 2016-Apr-22 14:53:12 2. Proceed Request To Change Acct... 2016-Apr-22 14:53:11 History: 1. Proceed Request To Change Acct... 2016-Apr-22 14:53:11	General Account Type: Lifeline VCare Account Status: Inactive Account Password: [REDACTED] Secret QSA: Add Security Question Address Type: Permanent Device ID: N/A Application Approval Date: 2016-Jun-29 Life Line Activation Date: 2016-Jun-29 Disconnection Date: 2016-Apr-22 Disconnection Reason: Non Usage Lifeline Program Participation: 1) Supplemental Nutrition Assistance Program (SNAP) Update Program or Income Data Household: N Tribal Flag: N Proof of Eligibility List 4 (if any):							

VCare Account: 1867067

MDN: [REDACTED]

Search Customer

Find Customer By: **Telephone** Search For: [REDACTED] **Search** **Advance Search**

Customer ID: 1867067 MDN: [REDACTED] **Add purchase** **Data Patch** **Bill Pay** **Equip Patch**

Enrollment ID: RATA1452265 ESN/SM #: [REDACTED] Company: TGM Carrier: 1867067

Recertification Required: **Live Status**

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
Info Wichita KS 67217 Billing Shipping Address: [REDACTED] SSN (Last 4): [REDACTED] DOB (yy/mm/dd): [REDACTED] Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: 0.00 Plan Details Current: Kansas 500 voice and unlimited international Plan: messaging Price: \$12.75	Line Features KS Federal Lifeline Discount: - \$9.25 KS Company Contribution: - \$3.50 Latest 5 Notes: 1. Proceed Request To Change Acct... 2016-Mar-15 07:44:27 2. Successfully Deactivated I... 2016-Mar-16 07:44:27 3. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 4. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 5. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 6. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 7. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 8. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 9. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 10. SMSURGENT: Your phone... 2016-Mar-14 11:31:43 History: 1. Proceed Request To Change Acct... 2016-Mar-15 07:44:27	General Account Type: Lifeline VCare Account Status: Inactive Account Password: [REDACTED] Secret QSA: Add Security Question Address Type: Temporary Device ID: N/A Application Approval Date: 2013-May-14 Life Line Activation Date: 2013-May-14 Disconnection Date: 2016-Mar-16 Disconnection Reason: Non Usage Lifeline Program Participation: 1) Supplemental Nutrition Assistance Program (SNAP) Update Program or Income Data Household: N Tribal Flag: N Proof of Eligibility List 4 (if any):							

VCare Account: 1853171

MDN: [REDACTED]

Search Customer

Find Customer By: Telephone [REDACTED] Search For: [REDACTED] Search [REDACTED] Advance Search

Customer ID: 1853171 MDN: [REDACTED] Add purchase Data Purch Btl Pay Equip Purch
 Enrollee ID: MA551721220 ESN/ESM #: [REDACTED] Company: TGM Carrier: Telusga

Recertification Required: [REDACTED]

Live Status

Customer	Invoice	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
Info [REDACTED] Wichita KS 67207 Billing Shipping Address: [REDACTED] SSN (Last 4): [REDACTED] DOB (yy-mm-dd): [REDACTED] Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: 0.00 Plan Details Current: Kansas 500 voice and unlimited international messaging Plan: [REDACTED] Price: \$12.75	Use Features KS Federal Lifeline Discount: - \$ 9.25 KS Company Contribution: - \$ 3.50 Latest 5 Notes: 1. Unknown/Unknown sent to mail... 2016-Jun-22 13:11:19 2. Account not verified to mail... 2016-Jun-07 16:11:20 3. Change Account Status Non Use... 2016-Jun-07 14:22:53 History: 1. Change Account Status Non Use... 2016-Jun-07 14:22:53	General Account Type: Lifeline VCare Account Status: Inactive Account Password: [REDACTED] Secret Q&A: Add Security Question Address Type: Temporary Device ID: N/A Application Approval Date: 2015-Jun-29 Life-line Activation Date: 2016-Jun-07 Disconnected Date: 2016-Jun-07 Disconnection Reason: Non Usage Lifeline Program Participation: 1) Supplemental Nutrition Assistance Program (SNAP) Lifeline Program is Income Based Household: N Tribal Flag: N Proof of Eligibility and Status							

VCare Account: 1854193

MDN: 316-218-2962*

Search Customer

Find Customer By: Telephone [REDACTED] Search For: [REDACTED] Search [REDACTED] Advance Search

Customer ID: 1854193 MDN: [REDACTED] Add purchase Data Purch Btl Pay Equip Purch
 Enrollee ID: MA551734537 ESN/ESM #: [REDACTED] Company: TGM Carrier: Telusga

Recertification Required: [REDACTED]

Live Status

Customer	Invoice	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
Info [REDACTED] Wichita KS 67218 Billing Shipping Address: [REDACTED] SSN (Last 4): [REDACTED] DOB (yy-mm-dd): [REDACTED] Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: 0.00 Plan Details Current: Kansas 500 voice and unlimited international messaging Plan: [REDACTED] Price: \$12.75	Use Features KS Federal Lifeline Discount: - \$ 9.25 KS Company Contribution: - \$ 3.50 Latest 5 Notes: 1. Proceed Request To Change Acct... 2016-Apr-25 11:59:12 History: 1. Proceed Request To Change Acct... 2016-Apr-25 11:59:12	General Account Type: Lifeline VCare Account Status: Inactive Account Password: [REDACTED] Secret Q&A: Add Security Question Address Type: Permanent Device ID: N/A Application Approval Date: 2015-Jul-13 Life-line Activation Date: 2016-Jul-13 Disconnected Date: 2016-Apr-25 Disconnection Reason: Non Usage Lifeline Program Participation: 1) Supplemental Nutrition Assistance Program (SNAP) Lifeline Program is Income Based Household: N Tribal Flag: N Proof of Eligibility and Status							

VCare Account: 1888725

MDN: [REDACTED]

Search Customer

Find Customer By: Telephone [REDACTED] Search for [REDACTED] Search Advance Search

Customer ID: 1888725 MDN: [REDACTED] Add purchase Data Purch Bill Pay Equip Purch

Enrollment ID: AT027293 ESN / SM #: 268435499904566383 Company: TGM Carrier: T-Mobile

Recertification Required: [REDACTED] Agent Name: Theodore Rister (101594) Master Agent Name: Selectel Inc.

Live Status

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
<p>Info</p> <p>VCare KS 87215</p> <p>Home Shipping Address:</p> <p>SN (Last 4): [REDACTED]</p> <p>DOB (mm/dd/yyyy): [REDACTED]</p> <p>Alternative Contact: Add Contact</p> <p>Email Address: [REDACTED]</p> <p>Current Account Balance: \$130</p> <p>Plan Details</p> <p>Current: Kansas 500 voice and unlimited international</p> <p>Plan: out500g</p> <p>Plan Price: \$12.75</p>	<p>Line Features</p> <p>KS Federal Lifeline Discount: -\$9.25</p> <p>KS Company Contributions: -\$3.50</p> <p>Latest Notes:</p> <p>1. Change Account Status Non Elec... 2015-Dec-17 22:24:22</p> <p>2. KS RTR Approval, Viewed KS... 2015-Sep-23 17:21:34</p> <p>3. VCare order approved by audit... 2015-Sep-23 16:32:21</p> <p>4. Account status changed from DL... 2015-Sep-23 16:32:21</p> <p>5. Account created by GGL... 2015-Sep-23 16:32:25</p> <p>History:</p> <p>1. Change Account Status Non Elec... 2015-12-17 22:24:22</p> <p>2. Account status changed from DL... 2015-09-23 16:32:27</p>	<p>General</p> <p>Account Type: Lifeline</p> <p>VCARE Account Status: Active</p> <p>Account Password: [REDACTED]</p> <p>Secret OAA: Add Security Question</p> <p>Address Type: Permanent</p> <p>Device ID: N/A</p> <p>Application Approval Date: 2015-Sep-23</p> <p>Life Line Activation Date: N/A</p> <p>Reconnection Date: 2015-Dec-17</p> <p>Xerox Approval Date: 2015-Sep-23</p> <p>Xerox Last Status: Approved</p> <p>Disconnection Reason: N/A</p> <p>Lifeline Program Participation:</p> <p>1) Supplemental Nutrition Assistance Program (SNAP)</p> <p>Update Program to Income Base</p> <p>Household: N</p> <p>Tribal Flag: N</p> <p>Proof of Eligibility Last 4 digits: 1130</p>							

VCare Account: 1857963

MDN: [REDACTED]

Search Customer

Find Customer By: Telephone [REDACTED] Search for [REDACTED] Search Advance Search

Customer ID: 1857963 MDN: [REDACTED] Add purchase Data Purch Bill Pay Equip Purch

Enrollment ID: 26A551787925 ESN / SM #: [REDACTED] Company: TGM Carrier: T-Mobile

Recertification Required: [REDACTED]

Live Status

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
<p>Info</p> <p>VCare KS 87215</p> <p>Home Shipping Address:</p> <p>SN (Last 4): [REDACTED]</p> <p>DOB (mm/dd/yyyy): [REDACTED]</p> <p>Alternative Contact: Add Contact</p> <p>Email Address: Add Email</p> <p>Current Account Balance: 0.00</p> <p>Plan Details</p> <p>Current: Kansas 500 voice and unlimited international</p> <p>Plan: out500g</p> <p>Plan Price: \$12.75</p>	<p>Line Features</p> <p>KS Federal Lifeline Discount: -\$9.25</p> <p>KS Company Contributions: -\$3.50</p> <p>Latest Notes:</p> <p>1. Processed Request To Change Acco... 2016-Jul-06 17:17:23</p> <p>2. SMSURGENT: Your phone... 2016-Jul-07 11:32:41</p> <p>3. SMSURGENT service in 10 d... 2016-May-23 11:30:51</p> <p>4. SMS(TAG will be forced to sanc... 2016-May-24 11:33:54</p> <p>5. SMS(Your service is @ risk... 2016-May-19 11:31:12</p> <p>History:</p> <p>1. Processed Request To Change Acco... 2016-07-06 17:17:23</p>	<p>General</p> <p>Account Type: Lifeline</p> <p>VCARE Account Status: Active</p> <p>Account Password: [REDACTED]</p> <p>Secret OAA: Add Security Question</p> <p>Address Type: Permanent</p> <p>Device ID: N/A</p> <p>Application Approval Date: 2015-Aug-21</p> <p>Life Line Activation Date: 2015-Aug-21</p> <p>Disconnection Date: 2015-Aug-25</p> <p>Disconnection Reason: Non Usage</p> <p>Lifeline Program Participation:</p> <p>1) Supplemental Nutrition Assistance Program (SNAP)</p> <p>Update Program to Income Base</p> <p>Household: Y</p> <p>Tribal Flag: N</p> <p>Proof of Eligibility Last 4 digits: [REDACTED]</p>							

VCare Account: 1853665

MDN: [REDACTED]

Search Customer

Find Customer By: Telephone [REDACTED] Search for [REDACTED] Search Advance Search

Customer ID: 1853665 MDN: [REDACTED] Add purchase: Data Purch Edit Pay Equip Purch
 Enrollment ID: BMS51727297 ESN / SM # Company: TGM Carrier: TalkSafe

Recertification Required: **Live Status**

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
<p>Info</p> <p>MSA K5 67218</p> <p>Bring Shipping Address:</p> <p>SN Last 4: [REDACTED] DOB by mm-dd:</p> <p>Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: \$0.00</p> <p>Temporary Address Need Scheduled Date: 1010-03-31 Contact Address:</p> <p>Plan Details</p> <p>Current Plan: Kansas 550 voice and unlimited international messaging Plan Price: \$12.75</p> <p>Line Features</p> <p>K5 Federal Lifeline Discount: -\$9.25 K5 Company Contribution: -\$3.50</p> <p>Latest Notes:</p> <p>1. OCM Inet Profile 2162183512 2015-Apr-22 15:10:20 2. Proceed Request To Change Acct... 2015-Apr-22 15:10:31 History: 1. Proceed Request To Change Acct... 2015-04-22 15:10:31</p> <p>General</p> <p>Account Type: Lifeline VCARE Account Status: Active Account Pathwork: Secret QAL: Add Security Question Address Type: Temporary Device ID: N/A</p> <p>Application Approval Date: 2015-Jul-06 Life Line Activation Date: 2015-Jul-06 Disconnected Date: 2015-Apr-22 Disconnection Reason: Non Usage</p> <p>Lifeline Program Participation:</p> <p>1) Supplemental Nutrition Assistance Program (SNAP) Unstable Program or Income State</p> <p>Household: Y Tribal Flag: N</p> <p>Proof of Eligibility Last 4 digits: [REDACTED]</p>									

VCare Account: 1926291

MDN: [REDACTED]

Search Customer

Find Customer By: Telephone [REDACTED] Search for [REDACTED] Search Advance Search

Customer ID: 1926291 MDN: [REDACTED] Add purchase: Data Purch Edit Pay Equip Purch
 Enrollment ID: ATG43370 ESN / SM # 2581354(2512031099) Company: TGM Carrier: TalkSafe
 Agent Name: Paul Martin(10153-p.martin) Master Agent Name: Selectel Inc.

Recertification Required: **Live Status**

Customer	Invoices	Payments	Notes	Orders	Purchase	Update Customer	History	Usage	Uploads
<p>Info</p> <p>MSA K5 67206</p> <p>Bring Shipping Address:</p> <p>SN Last 4: [REDACTED] DOB by mm-dd:</p> <p>Alternative Contact: Add Contact Email Address: Add Email Current Account Balance: \$0.00</p> <p>Plan Details</p> <p>Current Plan: Kansas 550 voice and unlimited international messaging Plan Price: \$12.75</p> <p>Line Features</p> <p>K5 Federal Lifeline Discount: -\$9.25 K5 Company Contribution: -\$3.50</p> <p>Latest Notes:</p> <p>1. Proceed Request To Change Acct... 2015-Aug-13 07:03:21 2. Customer transferred out of the s... 2015-Aug-13 07:03:21 3. BMS Keep your service active @... 2015-Jul-15 11:20:53 4. BMS/Wanna Stay Connected? Mail... 2015-Jul-09 11:30:45 5. called in and verified the ... 2015-Jul-29 13:20:57 History: 1. Proceed Request To Change Acct... 2015-08-13 07:03:21 2. Account Status changed from D... 2015-10-21 13:17:42</p> <p>General</p> <p>Account Type: Lifeline VCARE Account Status: Active Account Pathwork: Secret QAL: Add Security Question Address Type: Temporary Device ID: N/A</p> <p>Application Approval Date: 2015-Oct-21 Life Line Activation Date: N/A Disconnected Date: 2016-Aug-13 Xerox Approval Date: 2015-Oct-21 Xerox Last Status: Approved Disconnection Reason: N/AAD Transferout Denial</p> <p>Lifeline Program Participation:</p> <p>1) Supplemental Nutrition Assistance Program (SNAP) Unstable Program or Income State</p> <p>Household: N Tribal Flag: N</p> <p>Proof of Eligibility Last 4 digits: [REDACTED] 5595</p>									

TAG Mobile

Summary of Lifeline Credits Reported by and Paid to Company

Month	Lines Reported (1)	KLSP Credit	KLSP Paid to Company
Dec-12	1	\$ 7.77	\$ 7.77
Jan-13	82	7.77	637
Feb-13	97	7.77	754
Mar-13	462	7.77	3,590
Apr-13	3,592	7.77	27,910
May-13	4,719	7.77	36,667
Jun-13	6,855	7.77	53,263
Jul-13	8,520	7.77	66,200
Aug-13	8,864	7.77	68,873
Sep-13	8,006	7.77	62,207
Oct-13	7,349	7.77	57,102
Nov-13	6,290	7.77	48,873
Dec-13	5,512	7.77	42,828
Jan-14	4,778	7.77	37,125
Feb-14	4,324	7.77	33,597
Mar-14	4,346	7.77	33,768
Apr-14	3,732	7.77	28,998
May-14	3,472	7.77	26,977
Jun-14	3,222	7.77	25,035
Jul-14	2,997	7.77	23,287
Aug-14	2,456	7.77	19,083
Sep-14	2,260	7.77	17,560
Oct-14	2,079	7.77	16,154
Nov-14	1,958	7.77	15,214
Dec-14	1,875	7.77	14,569
Jan-15	1,176	7.77	9,138
Feb-15	1,164	7.77	9,044
Mar-15	1,076	7.77	8,361
Apr-15	1,080	7.77	8,392
May-15	1,263	7.77	9,814
Jun-15	1,276	7.77	9,915
Jul-15	2,402	7.77	18,664
Aug-15	3,189	7.77	24,779
Sep-15	3,229	7.77	25,089
Oct-15	3,230	7.77	25,097
Nov-15	4,341	7.77	33,730
Total	<u>121,274</u>		<u>\$ 942,299</u>

Notes:

1) KLSP Lines reported reflects final counts reported by Company, including all revisions, via signed, verified monthly Carrier Remittance Worksheets.

Summary of Accrued Lifeline Credits as Requested by Company

Month	Lines Reported (1)	KLSP Credit	Monthly KLSP Accrual	Total KLSP Accrual
Dec-15	4,148	\$ 7.77	32,230	\$ 32,230
Jan-16	3,781	\$ 7.77	29,378	61,608
Feb-16	3,175	\$ 7.77	24,670	86,278
Mar-16	3,045	\$ 7.77	23,660	109,938
Apr-16	2,413	\$ 7.77	18,749	128,687
May-16	2,255	\$ 7.77	17,521	146,208
Jun-16	2,138	\$ 7.77	16,612	162,820
Jul-16	1,998	\$ 7.77	15,524	178,345
Aug-16	1,817	\$ 7.77	14,118	192,463
Sep-16	1,636	\$ 7.77	12,712	205,175
Oct-16	1,530	\$ 7.77	11,888	217,063
Total	<u>27,936</u>		<u>\$ 217,063</u>	

Notes:

1) KLSP Lines reported reflects final counts reported by Company, including all revisions, via signed, verified monthly Carrier Remittance Worksheets.

Docket No. 16-TAGC-323-SHO

Exhibit Q

Page 1 of 2

Universal Service
Administrative Co.
[USAC Home](#) | [Lifeline Program](#) | [Telecom Carriers](#) | [Search Tools](#) | [Funding Disbursement Search](#)
FUNDING DISBURSEMENT SEARCH

(Spin = ALL , Study Area Code = ALL , Study Area Name = TAG% , Year = ALL , Month = ALL , State = KS)

This disbursement tool contains data from Jan 2004 through Oct 2016.

To view how the disbursement was calculated:

1. Select the company that you would like to review (the selected company will be highlighted blue)
2. Click the left mouse button to display a drop down menu
3. To hide the data, scroll to the company (the selected company will be highlighted blue) and click the left mouse button
4. The tool will display as many or few company data as you wish

Subscriber Count Notes:

1. For Disbursements based on projections (months prior to October 2012), subscriber counts for Form 497 data month are shown in month where true-up occurred.
2. * reflects USAC adjustments.

[Expand All](#)[New Search](#) [Close all tabs](#)

	State	SPIN	Study Area	Name	Lifeline	Linkup	TLS	TOTAL	Mo/Year
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$15,133.00	\$0.00	\$0.00	\$15,133.00	Oct/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$16,807.00	\$0.00	\$0.00	\$16,807.00	Sep/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$19,064.00	\$0.00	\$0.00	\$19,064.00	Aug/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$20,387.00	\$0.00	\$0.00	\$20,387.00	Jul/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$21,506.00	\$0.00	\$0.00	\$21,506.00	Jun/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$26,844.00	\$0.00	\$0.00	\$26,844.00	May/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$28,906.00	\$0.00	\$0.00	\$28,906.00	Apr/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$43,661.00	\$0.00	\$0.00	\$43,661.00	Mar/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$30,997.00	\$0.00	\$0.00	\$30,997.00	Feb/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$29,202.00	\$0.00	\$0.00	\$29,202.00	Jan/2016
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$40,154.00	\$0.00	\$0.00	\$40,154.00	Dec/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$29,841.00	\$0.00	\$0.00	\$29,841.00	Nov/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$29,905.00	\$0.00	\$0.00	\$29,905.00	Oct/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$29,905.00	\$0.00	\$0.00	\$29,905.00	Sep/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$24,069.00	\$0.00	\$0.00	\$24,069.00	Aug/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$11,822.00	\$0.00	\$0.00	\$11,822.00	Jul/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$11,951.00	\$0.00	\$0.00	\$11,951.00	Jun/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$10,397.00	\$0.00	\$0.00	\$10,397.00	May/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$10,527.00	\$0.00	\$0.00	\$10,527.00	Apr/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$10,786.00	\$0.00	\$0.00	\$10,786.00	Mar/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$11,397.00	\$0.00	\$0.00	\$11,397.00	Feb/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$17,538.00	\$0.00	\$0.00	\$17,538.00	Jan/2015
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$18,278.00	\$0.00	\$0.00	\$18,278.00	Dec/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$20,119.00	\$0.00	\$0.00	\$20,119.00	Nov/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$21,849.00	\$0.00	\$0.00	\$21,849.00	Oct/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$24,235.00	\$0.00	\$0.00	\$24,235.00	Sep/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$28,805.00	\$0.00	\$0.00	\$28,805.00	Aug/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$31,163.00	\$0.00	\$0.00	\$31,163.00	Jul/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$33,531.00	\$0.00	\$0.00	\$33,531.00	Jun/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$36,251.00	\$0.00	\$0.00	\$36,251.00	May/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$40,302.00	\$0.00	\$0.00	\$40,302.00	Apr/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$42,300.00	\$0.00	\$0.00	\$42,300.00	Mar/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$45,455.00	\$0.00	\$0.00	\$45,455.00	Feb/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$51,791.00	\$0.00	\$0.00	\$51,791.00	Jan/2014
<input type="checkbox"/>	KS	143035649	419030	TAG MOBILE LLC	\$63,020.00	\$0.00	\$0.00	\$63,020.00	Dec/2013

Exhibit Q

Page 2 of 2

12	KS	143035649	419030	TAG MOBILE LLC	\$68,487.00	\$0.00	\$0.00	\$68,487.00	Nov/2013
13	KS	143035649	419030	TAG MOBILE LLC	\$74,065.00	\$0.00	\$0.00	\$74,065.00	Oct/2013
14	KS	143035649	419030	TAG MOBILE LLC	\$83,898.00	\$0.00	\$0.00	\$83,898.00	Sep/2013
15	KS	143035649	419030	TAG MOBILE LLC	\$79,152.00	\$0.00	\$0.00	\$79,152.00	Aug/2013
16	KS	143035649	419030	TAG MOBILE LLC	\$63,585.00	\$0.00	\$0.00	\$63,585.00	Jul/2013
17	KS	143035649	419030	TAG MOBILE LLC	\$43,697.00	\$0.00	\$0.00	\$43,697.00	Jun/2013
18	KS	143035649	419030	TAG MOBILE LLC	\$33,365.00	\$0.00	\$0.00	\$33,365.00	May/2013
19	KS	143035649	419030	TAG MOBILE LLC	\$4,292.00	\$0.00	\$0.00	\$4,292.00	Apr/2013
20	KS	143035649	419030	TAG MOBILE LLC	\$1,083.00	\$0.00	\$0.00	\$1,083.00	Mar/2013
21	KS	143035649	419030	TAG MOBILE LLC	\$768.00	\$0.00	\$0.00	\$768.00	Feb/2013

[New Search](#) [Close all tabs](#)

Key
Entered: The month/year the data was entered by USAC into its Low Income database
Applies: The "Data Month" -- Line 4b on FCC Form 497
Type: Projection, True-up or Projection Override
Projection: The amount of support the Low Income system determines a company will need for the month, based on historical support claims
True-up: The difference between the projection and the amount the company claimed on FCC Form 497 for prior months (this can be one month or multiple months)
Projection override: In some cases, USAC will manually adjust the projection for new companies to prevent a large true-up in the future

Docket No. 16-TAGC-323-SHO

Redacted Exhibit R

Exhibit R, consisting of 3 pages, contains Confidential Information

**Kansas Corporation Commission
Information Request**

Request No: 16

Company Name TAG Mobile, LLC

TAGC

Docket Number 16-TAGC-323-SHO

Request Date August 24, 2016

Date Information Needed August 31, 2016

RE:

Please Provide the Following:

In response to DR 12, TAG indicates it is unable to locate the purchase or sale agreement for the class 5 Cisco switch in Los Angeles, CA that TAG indicated it owned in its ETC Application in Docket No. 12-TAGC-843-ETC.

Please provide any documentation that TAG has to verify that TAG ever owned the class 5 Cisco switch in Los Angeles, CA. Please include all relevant documentation including the date the switch was acquired, the date it was sold, etc.

TAG's RESPONSE: As previously stated, we have been unable to locate any documentation on the ownership of the switch.

Submitted By Christine Aarnes

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon

Date: 8/31/2016

**Kansas Corporation Commission
Information Request**

Request No: 16

Company Name TAG Mobile, LLC TAGC

Docket Number 16-TAGC-323-SHO

Request Date August 24, 2016

Date Information Needed August 31, 2016

RE: UPDATED RESPONSE 10/26/2016

In response to DR 12, TAG indicates it is unable to locate the purchase or sale agreement for the class 5 Cisco switch in Los Angeles, CA that TAG indicated it owned in its ETC Application in Docket No. 12-TAGC-843-ETC. Please provide any documentation that TAG has to verify that TAG ever owned the class 5 Cisco switch in Los Angeles, CA. Please include all relevant documentation including the date the switch was acquired, the date it was sold, etc.

TAG's RESPONSE: As previously stated, we have been unable to locate any documentation on the ownership of the switch.

UPDATED RESPONSE: See UPDATED Response to DR#12.

Submitted By Christine Aarnes

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon
Date: 10/26/16

**Kansas Corporation Commission
Information Request**

Request No: 12

Company Name TAG Mobile, LLC TAGC
Docket Number 16-TAGC-323-SHO
Request Date July 28, 2016
Date Information Needed August 5, 2016

RE: UPDATED RESPONSE 10/26/2016

Please Provide the Following:

In its ETC Application in Docket No. 12-TAGC-843-ETC, TAG indicated it owns a class 5 Cisco switch in Los Angeles, CA.

Please provide the following:

- a. The purchase agreement for the class 5 Cisco switch, including the date the switch was purchased.

TAG's RESPONSE: Unfortunately, TAG was unable to locate the purchase agreement.

UPDATED RESPONSE: See EXHIBIT A titled "Reunion Contract" and EXHIBIT B titled "Invoice"

- b. The sale agreement for the class 5 Cisco switch, including the date the switch was sold or otherwise no longer owned by TAG.

TAG's RESPONSE: Unfortunately, TAG was unable to locate the sale agreement.

UPDATED RESPONSE: The switch was purchased by TAG. See Exhibit B titled "Invoice"

Submitted By Sandy Reams

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____

Date: _____

Mary Calderon
10/26/16

**NETWORK SWITCHING AND FACILITIES
CAPITAL LEASE**

BETWEEN

REUNION COMMUNICATIONS, INC.

AND

TAG MOBILE, LLC

NETWORK SWITCHING AND FACILITIES CAPITAL LEASE

This Network Switch and Facilities Capital Lease ("Lease"), dated below, is entered into by and between Reunion Communications, Inc., an Illinois corporation, with its principal business address at 106 West Calendar Avenue, Suite 190, LaGrange, Illinois 60525 ("Lessor"), and TAG Mobile, LLC, a Texas Limited Liability Company, with its principal place of business at 1330 Capital Parkway, Carrollton, TX, 75006 ("Purchaser").

Recitals

WHEREAS, Lessor offers a lease of network switching and related facilities, described in Exhibit A, incorporated herein by reference, to entities that are certified Lessors of wireless services, for the exclusive use of their retail End Users, (the "Services"); and

WHEREAS, Lessee desires to lease the equipment, capabilities, and capacities so specified, and Lessor desires to provide the Services specified upon the terms and conditions set forth in this Lease.

Lease

NOW, In consideration of the mutual covenants and Leases set forth herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties, intending to be legally bound, agree as follows:

1. **Lessee Obligations.** Lessee shall at all times conduct its efforts in a commercially reasonable, ethical and prudent manner. Lessee shall not make any representations and/or statements with respect to Lessor or the Services provided hereunder, other than those approved in writing by Lessor. Furthermore, Lessee agrees that the Services provided to the End User are provisioned under the regulatory approval held by the Lessee or under Lessee's other arrangement with a properly certified carrier, that such regulatory approvals have been secured, and will be maintained, for the duration of this Lease.
2. **Service Commencement Date.** Lessor shall commence providing Services to Lessee hereunder as of May 1, 2011, conditioned upon prompt receipt of all funds due.
3. **Terms and Conditions.** Lessor shall furnish Services to Lessee at the rates, terms and conditions described in Exhibits B and B-1, incorporated herein by reference. The Services to be provided to Lessee are limited to those set forth in Exhibit A. Lessor may change the rates, terms, conditions described herein as adhered to commercially reasonable standards, in any Exhibit to this Lease and any attachment or any subsequent rate sheet or Exhibit by providing Lessee with thirty calendar days' prior written notice or such shorter notice period as mutually agreed upon by Lessor and Lessee, except that the monthly recurring switch lease amount and related interest payment calculation is not subject to this provision. If such notice represents an increased cost to Lessee, such notice shall allow Lessee to terminate this lease on the day prior to the scheduled increase in costs without penalty or additional costs.

4. **Term, Lease type.** This capital lease shall be effective and the parties' obligations shall commence upon the commencement date of this Lease (the "Service Commencement Date") and shall continue for a period of three years. The capitalized amount of the lease is \$99,900.00, payable in 36 equal lease payments of \$2,775.00 each. An interest charge equivalent to the applicable federal rate "AFR" will be added to each payment, and will be adjusted to reflect the AFR as defined by the Internal Revenue Service. At the end of the lease period, providing all lease payments, all taxes as described in this Section, all applicable fees have been satisfied, and all accounts that Lessee has with Lessor are current, the Lessee may purchase the port card for the sum of \$1,000.00. If the purchase is not completed and payment executed within thirty (30) calendar days of the due date of the final scheduled lease payment, the Lessee is deemed to have declined the purchase option.
5. **Prompt payment as Condition of Service.** The lease amount is due and payable on the first calendar day of each month during the term of the lease, and will be charged to Lessee's account with Lessor. If there are not sufficient funds in the Lessee's account with Lessor to fund the payment, Lessee will have five business days in which to provide payment. If payment is not received by Lessor the end of the fifth business day, Lessor may cease services to the Lessee for services provided under this lease until all accounts with Lessor are current.
6. **Amount and Terms of Payment.** The non-refundable non-recurring charge for the services associated with the Lease is due at signing. Usage charges for transport due net 25 days.

Requests for payment should be sent to:

Frank Del Col, CEO
Email: frank.delcol@tagmobile.net
Phone: 972.488.5500, ext. 4032

7. **Billing Disputes and Errors.** If Lessee, in good faith, disputes any invoiced amount, Lessee must (i) notify Lessor in writing, by either U.S. Mail or electronic mail address specifically provided for billing dispute purposes, of such dispute within thirty days of the date of such disputed activity, (ii) provide, at the same time as such dispute is declared, any and all reasons, records, and supporting documentation that has been created for such dispute and provide sufficient detail for Lessor to determine the merit of the dispute. In the event Lessee fails to declare such dispute in a timely manner, Lessor shall not be obligated to consider any such disputes. Upon dispute, Lessor and Lessee agree to use commercially reasonable efforts to resolve the dispute in good faith within fifteen (15) business days after Lessor's receipt of written notice from Lessee. In the event that Lessor and Lessee are unable to resolve the dispute within this fifteen (15) business day period, the dispute shall be submitted to arbitration, as otherwise provided for in this Lease.
8. **Taxes and Regulatory Fees/Surcharges.** Lessee acknowledges and understands that Lessor computes all charges herein exclusive of any applicable taxes. If it should be



discovered that federal, state, or local taxing bodies have authority to levy a tax upon the lease, Lessee agrees to reimburse Lessor for such taxes within twenty (20) days of such invoice being sent to Lessee. Lessor shall take commercially reasonable steps to determine whether any taxes are due to federal, state, or local authorities within the first calendar month of lease, and agrees to promptly bill Lessee for any bona fide taxes, surcharges, or other similar liability.

9. **Termination.** Except as otherwise provided herein and except for Lessee's failure to remit payments to Lessor in such manner as to provide reasonably uninterrupted Services to End Users, and to pay any and all amounts which may be due to Lessor hereunder (as governed by Section 6 of this Lease), should either party default under this Lease, the non-defaulting party may, at its sole option, give written notice to the party which has failed to perform or has breached this Lease of its intention to terminate this Lease. In such event, the non-defaulting party must provide such written notice by certified return receipt prepaid first-class U.S. Mail to the other party. In the event the defaulting party does not cure the default within thirty days after receipt of notice, the non-defaulting party shall have the option to immediately terminate this Lease. Either party may terminate this Lease without liability at any time upon ten business days written notice if the other party becomes subject to bankruptcy or insolvency proceedings or has made an assignment for the benefit of creditors. In the event a federal, state or local law, regulation, ruling, or material change as described in Section 3, is adopted or issued that materially affects Lessor or its ability to continue to provide the Services so as to render, in Lessor's reasonable judgment, continuation of the Services unlawful or infeasible, either party may terminate this Lease upon written notice to the other party. Termination of this Lease, by either party and for any reason, shall invalidate the purchase option described in Section 4.

10. **No Warranties, Limitation of Liability.** LESSOR MAKES NO WARRANTY, EXPRESS OR IMPLIED, WITH RESPECT TO THE QUALITY OR SUFFICIENCY OF THE SERVICES PROVIDED HEREUNDER AND EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY, DESCRIPTION OR FITNESS FOR ANY PARTICULAR PURPOSE OR FUNCTION. IN NO EVENT SHALL LESSOR OR ANY OF ITS AFFILIATES, VENDORS, OFFICERS, DIRECTORS, SHAREHOLDERS, EMPLOYEES, OR AGENTS BE LIABLE TO LESSEE OR ANY OF ITS AFFILIATES, END USERS, OR EMPLOYEES OR TO ANY THIRD PARTY FOR: (I) ANY LOSS OF PROFIT OR REVENUE, OR FOR ANY INDIRECT, CONSEQUENTIAL, INCIDENTAL, PUNITIVE OR SIMILAR OR ADDITIONAL DAMAGES, WHETHER INCURRED OR SUFFERED AS A RESULT OF UNAVAILABILITY OF SERVICES, PERFORMANCE, NON-PERFORMANCE, TERMINATION, BREACH, OR OTHER ACTION OR INACTION UNDER THIS LEASE, OR FOR ANY OTHER REASON, EVEN IF LESSEE ADVISES LESSOR OF THE POSSIBILITY OF SUCH LOSS OR DAMAGE, OR (II) FOR ANY OUTAGE OR INCORRECT OR DEFECTIVE SERVICES PROVIDED BY LESSOR HEREUNDER, OR ANY CONSEQUENCES THEREOF. HOWEVER, LESSOR WARRANTS THAT IT WILL USE COMMERCIALY REASONABLE STANDARDS TO REMEDY ANY UNAVAILABILITY OF SERVICES, PERFORMANCE, NON-PERFORMANCE, OUTAGE, INCORRECT OR DEFECTIVE SERVICES, OR OTHER ACTION OR INACTION UNDER THIS LEASE.

11. **Indemnity.** Both parties shall indemnify and hold harmless the other party, its affiliates, vendors, officers, directors, stockholders, employees and agents from any and all

loss, cost, damages, expense or liability, including, without limitation, court costs and reasonable attorneys fees, arising out of, in whole or in part, directly or indirectly, Services acquired hereunder. Lessee further agrees to hold Lessor harmless from any End User claim, suit, or other action as a result of Lessor's management of the Lessee's account, and subsequent impact upon, End User customer accounts. Lessor shall provide equivalent indemnity to Lessee.

12. **Regulations.** This Lease is made expressly subject to all present and future valid orders and regulations of any regulatory body having jurisdiction over the subject matter hereof and to the laws of the United States of America, any of its states, territories or possessions, or any foreign governmental agency having jurisdiction. In the event this Lease, or any of its provisions, shall be found contrary to or in conflict with any such order, rule, regulation or law, this Lease shall be deemed modified or automatically terminated to the extent necessary to comply with any such order, rule, regulation or law and to the extent possible, shall be modified in such a way as is consistent with the form, intent and purpose of this Lease.

13. **Government Authority.** Both parties represent and warrant that: (i) it is qualified to do business in each of the jurisdictions in which it conducts its business; (ii) it has received any and all necessary permits, licenses, approvals, grants, and charters necessary to carry out the business in which both parties are engaged; and (iii) both parties have complied with and will continue to comply with all laws, regulations, orders, and statutes which may be applicable to both parties, whether local, state or federal, during the term of this Lease. From the date of this Lease until the termination hereof, both parties agree to operate in accordance with and to maintain current all such certifications, tariffs, permits, licenses, approvals, grants, charters, and to comply with all applicable laws, regulations, orders and statutes, whether local, state or federal. A breach by either party of any of the representations, warranties or covenants of this section may be deemed default hereunder.

14. **No Agency.** Neither party is authorized to act as an agent for, or legal representative of, the other party and neither party shall have the authority to assume or create any obligation on behalf of, in the name of, or binding upon the other party.

15. **Force Majeure.** The parties obligations under this Lease are subject to, and neither party shall be liable for, delays, failure to perform (except the payment of money by Lessee for services utilized hereunder), damages, losses or destruction, or malfunction of any equipment or any consequence thereof caused or occasioned by, or due to fire, flood, water, cable cuts, earthquake, act of terrorism, act of God, environmental elements, labor disputes or shortages, utility curtailments, power failures, explosions, civil disturbances, governmental actions, shortages of equipment or supplies, unavailability of transportation, acts or omissions of third parties, or any other cause beyond the party's reasonable control.

16. **No Waiver.** The failure of either party to enforce or insist upon compliance with any of the provisions of this Lease or the waiver thereof, in any instance, shall not be construed as a general waiver or relinquishment of any other provision of this Lease, nor shall such a failure by either party constitute a waiver of such provision at any future time, whether for same, similar, or dissimilar event(s).



17. **Binding Effect.** This Lease shall be binding upon and inure to the benefit of the parties hereto and their respective heirs, successors and assigns.
18. **No Assignment.** Both parties shall not voluntarily, or by operation of law, assign, transfer, license, or otherwise transfer all or any part of its right, duties or other interests in this Lease without the other party's prior written consent, such consent shall not be unreasonably withheld or delayed. Any attempt to make an Assignment in violation of this provision shall be null and void. Either party's failure to comply with the assignment provision, as contained in this paragraph, shall give the other party, at its sole discretion, the option to either accept the assignee or terminate this Lease. No assignment shall release either party of its obligations hereunder, except as may be expressly provided in such assignment, as approved by the other party.
19. **Amendment.** Except for Lessor's unilateral right to increase or decrease rates upon thirty days' notice as set forth in Section 3, this Lease may not be amended except by an instrument in writing, executed by an authorized officer of each party.
20. **Merger.** This Lease, including its Exhibits, supersedes and merges all prior Leases, promises, understandings, statements, representations, warranties, indemnities and covenants and all inducements to the making of this Lease relied upon by either party herein, whether written or oral, and embodies the parties complete and entire Lease with respect to the subject matter hereof. No statement of Purchaser, oral or written, made before or after the execution of this Lease shall vary or modify the written terms hereof in any way whatsoever.
21. **Interpretation.** The words and phrases used herein shall have the meaning generally understood in the telecommunications industry. This Lease shall be construed in accordance with its fair meaning and not for or against either party.
22. **Third Party Beneficiaries/Parties in Interest.** This Lease has been made and is made solely for the benefit of the Lessor and Lessee, and their respective successors and permitted assigns. Nothing in this Lease is intended to confer any rights/remedies under or by reason of this Lease on any third party.
23. **Severability.** If any term or provision of this Lease is determined to be illegal, unenforceable, or invalid in whole or in part for any reason, such illegal, unenforceable, or invalid provisions or part(s) thereof shall be stricken from this Lease and such provision shall not affect the legality, enforceability, or validity of the remainder of this section. The stricken provision shall be replaced, to the extent possible, with a legal, enforceable, and valid provision that is similar in tenor, intent, and consequences to the stricken provision as is legally possible.
24. **Representation of Authority.** Each party represents and warrants that: (i) the individual executing this Lease is authorized to bind the party on whose behalf he/she is signing to the terms of this Lease; (ii) the execution and delivery of this Lease and the performance of such party's obligations hereunder have been duly authorized; and (iii) the

Lease is a valid and legal Lease binding on such parties and enforceable in accordance with its terms.

25. **Further Assurances.** The parties shall at their own cost and expense execute and deliver such further documents and instruments and shall take such other actions as may be reasonably required or appropriate to carry out the intent and purposes of this Lease.

26. **Notices.** All notices, demands, requests and other communications required or permitted hereunder shall be in writing and shall be deemed to be delivered when first attempt at delivery is made by reputable overnight carrier, the following business day if by facsimile, or the third business day when sent by prepaid U.S. Mail, to the address and facsimile numbers set forth below:

If to Lessor:

Reunion Communications, Inc.
106 West Calendar Avenue, Suite 190
LaGrange, Illinois 60525

Attention: Kathryn A. Hoekstra, Secretary-Treasurer
Telephone: 630.243.7524
Facsimile: 630.243.7417

If to Lessee:

TAG Mobile, LLC
1330 Capital Parkway
Carrollton, Texas 75006

Attention: Frank Del Col, Chief Executive Officer
Email: frank.delcol@tagmobile.net
Telephone: 972.488.5500, ext. 4032
Facsimile: 469.574.5830

27. **Governing Law.** This Lease shall be in all respects, governed by, construed, and enforced in accordance with the laws of the State of Texas, venue in Dallas, Texas, including all matters of construction, validity and performance. In any action or proceeding arising out of this Lease, the party prevailing in such action shall be entitled to recover its reasonable attorney's fees and costs, unless such attorney(s) is a salaried employee of the prevailing party.

28. **Counterparts.** This Lease may be executed in several counterparts, each of which shall constitute an original, but all of which shall constitute one and the same instrument.

29. **Confidentiality, Trade Secrets.** Lessee acknowledges that Lessor's business depends to a significant degree upon the possession of information that is not generally known to others, and that the viability of Lessor's business requires that this information

remain proprietary to Lessor. Accordingly, Lessee agrees that neither it nor any of its officers, directors, agents or employees, nor any of their affiliates will, except as required in the course of its relationship with Lessor, disclose or use during or subsequent to the term of this Lease, any Confidential Information relating to Lessor's business of which Lessee becomes aware by reason of being associated with Lessor or to which Lessee gains access. Such information includes, but is not limited to, the terms and conditions contained herein, End User lists, lists of prospective End Users, vendor identities, data, records, traffic reports, sales information, computer programs, manuals, processes, methods and any other information otherwise used by Lessor in the operation of its business and not generally known by the public at large. All records and other materials relating in any way to any Confidential Information shall be and remain Lessor's sole property during and after the term of this letter Lease. The unauthorized disclosure of this Lease or the terms hereof shall constitute a material breach hereof. Lessee and Lessor acknowledge and agree that unauthorized disclosure would cause irreparable harm, which would not be adequately compensated for by monetary damages. Thus, in addition to its remedies in law, upon unauthorized disclosure the harmed party shall be entitled to equitable relief, including without limitation a temporary restraining order (obtained ex parte) as well as permanent injunctive relief and the other waives all defenses to the issuance of such an Order, all without the need of posting a bond or similar financial requirement. Lessor will provide equivalent protection to Lessee's Confidential Information.

IN WITNESS WHEREOF, the parties have executed this Lease as of the day and year first written below.

REUNION COMMUNICATIONS, INC.

By: Mark Widdin
Printed: MARK WIDDIN
Its: President
Date: 4-25-2011

TAG MOBILE, LLC

By: Frank Abela
Printed: FRANK ABELA
Its: CEO
Date: 4-25-11



List of Exhibits

Exhibit A Description of Services

Exhibit B Rates, Terms and Conditions

Exhibit B-1 Schedule of Charges



Network Switching and Facilities
Capital Lease

Exhibit A

Description of Services

Network Switch and Related Elements

Scope. This Lease grants the lease of network switching and related facilities designed to facilitate telecommunications services, based upon provisioning done by Lessee.

1. Cantata Excel CSP
2. All common hardware required to function
3. AC/DC power
4. Support
5. Network and switch maintenance
6. Access to software for provisioning and customer service operations
7. Usage capacity
8. Access to Directory Assistance
9. Card 1/Port 2

Services furnished by Lessor permit Lessee to establish an account for the transport and routing of Directory Assistance "411" traffic as sent to Lessor by Lessee.

Lessee shall route Directory Assistance calls to a Toll-Free Number via the Public Switched Telephone Network "PSTN".

Access to Directory Assistance. Lessor will make access to Directory Assistance available to subscribers provisioned under this lease. Such calls will be billed directly to end user without cost or liability to Lessee, and methods of payment will be at the discretion of the Directory Assistance Lessor. Calls will be processed through the network switch and related facilities. Alternately, Purchaser may elect to provide end users with a no-charge Directory Assistance service that is advertising supported; end user costs, if any, for advertising-supported Directory Assistance, are defined by the Lessee.

Authority. Lessee agrees that it will: (i) provision all toll Services to End Users upon the basis of Purchaser's regulatory certifications to provide such services, and (ii) provide customer service to its End Users.

Reunion Communications, Inc.
TAG Mobile, LLC, 5-1-2011
Switch Lease - Exhibits A-B1 (1.0)

10

Lessor Initials

mm

Purchaser Initials

Rpc

Network Switching and Facilities Capital Lease

Exhibit B

Rates, Terms and Conditions

Statement Period. The statement period for the lease shall be each calendar month for the duration of the lease. The Monthly Recurring Charge "MRC" shall be charged on the first of each month on a prospective basis. Usage costs and the Switch Utilization Charge, as defined herein, will be billed after the conclusion of the calendar month; payment for usage costs is due no later than the 25th of the month following the service period.

Billing Increments. Lessor will measure each Directory Assistance access call in an initial increment of six seconds and subsequent increments of six seconds, the duration of any partial period being rounded up to next increment.

Implementation. Lessor and Lessee mutually agree to implement the following items:

1. Daily Call Detail Reports of Directory Assistance access calls.
2. Lessor will set up an FTP site for posting of call detail files generated by Lessee's end users.
3. Lessor authenticates lessee access to FTP sites based upon, but not limited to, verification of lessee's static Internet Protocol "IP" address. Lessee is responsible to provide a static IP address to the Lessor for access to FTP site.





Network Switching and Facilities Capital Lease**Exhibit B-1****Charges****Network Switch and Related Elements**

Description	Monthly Charge
Lease of Switch Port	As defined in Section 4 of Lease
Switch Utilization Charge	\$200.00 per 200,000 minutes or portion thereof (minimum \$200.00 per month)

Initial Costs

Description	Amount
Set-up fee	\$2,500.00

Ancillary Items

Description	Per Minute Charge
Directory Assistance Access Transport	.0220 per minute

<END OF EXHIBIT B-1>

Lessor Initials



Purchaser Initials



Kansas Corporation Commission
Information Request

Request No: 10

Company Name TAG Mobile, LLC

TAGC

Docket Number 16-TAGC-323-SHO

Request Date July 18, 2016

Date Information Needed July 25, 2016

RE: Facilities

Please Provide the Following:

TAG was granted Eligible Telecommunications Carrier (ETC) designation within specified AT&T wire centers for purposes of receiving Federal and Kansas low-income Lifeline Service Program support (KLSP), in part, because TAG stated it would offer service to KLSP subscribers using its own facilities or a combination of its own facilities and resale of another carrier's facilities and would meet the facilities requirement for KLSP purposes.

Please provide the following:

a. A description (e.g. switch, lines, etc.) and location of each facility TAG owns used to provide service to KLSP subscribers;

TAG's Response: Tag Mobile, LLC does not currently own its own facility.

b. A description and location of each facility or service leased or, in any other manner, used by TAG in combination with its own facilities to provide service to KLSP subscribers. Please specify the lease/contract period.

TAG's Response: Tag Mobile, LLC leases a switch from SIP Trunks of Wisconsin, Inc. with its principal business address at 2018 Burr Oak Road, Oshkosh, Wisconsin 54904. The contract period begins April 10, 2015 for two years.

Submitted By Sandy Reams

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon

Date: 7/25/2016

**Kansas Corporation Commission
Information Request**

Request No: 10

Company Name TAG Mobile, LLC

TAGC

Docket Number 16-TAGC-323-SHO

Request Date July 18, 2016

Date Information Needed July 25, 2016

RE: Facilities - UPDATED RESPONSE 10/26/2016

Please Provide the Following:

TAG was granted Eligible Telecommunications Carrier (ETC) designation within specified AT&T wire centers for purposes of receiving Federal and Kansas low-income Lifeline Service Program support (KLSP), in part, because TAG stated it would offer service to KLSP subscribers using its own facilities or a combination of its own facilities and resale of another carrier's facilities and would meet the facilities requirement for KLSP purposes.

Please provide the following:

- a. A description (e.g. switch, lines, etc.) and location of each facility TAG owns used to provide service to KLSP subscribers;
TAG's Response: TAG Mobile, LLC does not currently own its own facility.
UPDATED RESPONSE: TAG owns a managed voice switch located at 2775 Northwoods Pkwy, Norcross, Georgia.
- b. A description and location of each facility or service leased or, in any other manner, used by TAG in combination with its own facilities to provide service to KLSP subscribers. Please specify the lease contract period.
TAG's Response: TAG Mobile, LLC leases a switch from SIP Trunks of Wisconsin with its principal business address at 2018 Burr Oak Road, Oshkosh Wisconsin 54904. The contract period begins April 10, 2015 for two years.
UPDATED RESPONSE: TAG owns the switch.

Submitted By Sandy Reams

Submitted To Mary Calderon

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Mary Calderon

Date: 10/26/16

CERTIFICATE OF SERVICE

16-TAGC-323-SHO

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Summary Judgment Motion to Revoke Tag Mobile's ETC Designation; Return KLSP Funds; and Assess Penalties was served by electric service on this 5th day of December, 2016, to the following:

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Pamela Griffeth
Administrative Specialist

* Denotes those receiving the Confidential version