

**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.)

JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE

The Staff of the Kansas Corporation Commission (Staff and Commission, respectively) and TAG Mobile, LLC (TAG) hereby jointly move for the Commission to modify the procedural schedule in this matter to (1) require Staff's Direct Testimony to be filed June 23, 2017, rather than June 16, 2017; and (2) require TAG to respond to Staff Data Requests (DRs) 19 and 20 by June 15, 2017. In support thereof, Staff and TAG state the following:

1. On March 28, 2017, the Commission issued a Procedural Schedule in this matter setting a Staff Pre-Filed Direct Testimony due date of June 16, 2017.
2. On May 24, 2017, Staff issued DR 19 to TAG seeking information pertaining to the Universal Service Administration Company's 2015 audit of TAG. The response was due June 5, 2017. TAG failed to respond by the deadline or request an extension of time to respond.
3. On May 30, 2017, Staff issued DR 20 to TAG seeking information relating to the number of lines reported for the federal Lifeline program. The response was due June 8, 2017. TAG failed to respond by the deadline or request an extension of time to respond.
4. On June 9, 2017, Staff and TAG discussed the outstanding DRs and agreed to resolve the matter by extending the due dates for the discovery responses, as well as the due date for Staff's Pre-Filed Direct Testimony to allow time for Staff to incorporate the DR responses

into its Direct Testimony. Staff and TAG agreed that all other due dates in the Procedural Schedule would remain the same.

WHEREFORE, Staff and TAG move the Commission to the modify the Procedural Schedule in this matter to (1) require Staff's Direct Testimony to be filed June 23, 2017, rather than June 16, 2017; and (2) require TAG to respond to Staff Data Requests (DRs) 19 and 20 by June 15, 2017.

Respectfully Submitted,



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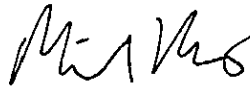


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STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

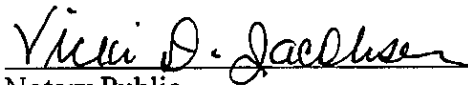
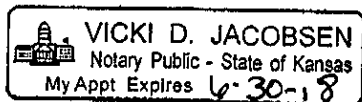
VERIFICATION

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 *Joint Motion to Modify Procedural Schedule* 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 12th day of June, 2017.



Notary Public

My Appointment Expires: June 30, 2018

CERTIFICATE OF SERVICE

16-TAGC-323-SHO

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion to Modify Procedural Schedule was served via electronic service this 12th day of June, 2017, to the following:


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