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NEW APPLICATION  
KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP



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BRUSSELS, BELGIUM Arizona Corporation Commission

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AZ CORP COMM  
Director - Utilities

Thomas Broderick  
Arizona Corporation Commission  
1200 W Washington St.  
Phoenix, AZ 85077-2996

T-20861A-16-0378  
T-20870A-16-0378

Re: Notification of Boomerang Wireless, LLC d/b/a enTouch Wireless and Total  
Call Mobile Regarding a Transfer of Customers

Dear Mr. Broderick,

~~T-20871A~~ T-20861A  
~~T-20853A~~ T-20870A

Boomerang Wireless, LLC (Boomerang or the Company) and Total Call Mobile (Total  
Call and, together with Boomerang, the Parties) hereby notify the Arizona Corporation  
Commission (Commission) of their intention to transfer certain Total Call wireless Lifeline  
customers to Boomerang (the Transaction). For the Commission's records, the Parties provide  
the following information:

I. THE PARTIES

A. Boomerang Wireless, LLC d/b/a enTouch Wireless (Boomerang)

Boomerang is a limited liability company located at 955 Kacena Rd. Suite A, Hiawatha,  
IA 52233. The Company provides prepaid wireless services to customers in twenty-four states,  
including in Arizona.<sup>1</sup> The Company has been designated as an eligible telecommunications  
carrier (ETC) to provide Lifeline services to low-income consumers on a wireless basis in 27  
states, currently serving approximately 260,000 Lifeline customers throughout its operating  
territory. Boomerang was designated by the Commission as an ETC to provide Lifeline services  
on a wireless basis on July 30, 2013 and amended October 24, 2014 in Docket No. T-20861A-  
12-0415. Boomerang currently serves approximately 5,170 Lifeline customers in Arizona.

<sup>1</sup> Boomerang also holds international Section 214 authority from the Federal Communications  
Commission (FCC).

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**B. Total Call Mobile (Total Call)**

Total Call, a California corporation, is headquartered at 1411 W 190<sup>th</sup> St, Suite 700, Gardena, CA 90248. Total Call provides wireless services throughout the United States, including in Arizona. Total Call has been designated as an ETC to provide Lifeline services to low-income consumers on a wireless basis in numerous states and Puerto Rico. The Commission designated Total Call as an ETC to provide wireless Lifeline services on January 7, 2014 in Docket No. T-20870A-12-0500.

**II. DESIGNATED CONTACTS**

Correspondence or other materials concerning this Notification should be directed to:

Joshua T. Guyan  
Kelley Drye & Warren LLP  
3050 K Street NW, Suite 400  
Washington, D.C. 20007  
Tel: (202) 342-8566  
Fax: (202) 342-8451  
Email: [jguyan@kelleydrye.com](mailto:jguyan@kelleydrye.com)

William K. Mosca, Jr.  
Bevan, Mosca & Giuditta, P.C.  
222 Mt Airy Road, Suite 200  
Basking Ridge, NJ 07920  
Tel: (908) 753-8300  
Fax: (908) 753-6423  
Email: [wmosca@bmg.law](mailto:wmosca@bmg.law)

with a copy to:

Kimberley Lehrman  
Boomerang Wireless LLC  
President  
955 Kacena Road, Suite A  
Hiawatha, Iowa 52233  
FAX: 319.743.1293  
EMAIL: [klehrman@readywireless.com](mailto:klehrman@readywireless.com)

Saturo Manabe  
President/CEO  
Total Call Mobile  
1411 W 190<sup>th</sup> Street  
Suite 700  
Gardena, CA 90248  
EMAIL: [saturo.manabe@kddia.com](mailto:saturo.manabe@kddia.com)

**II. DESCRIPTION OF THE TRANSACTION**

Pursuant to the terms of a Customer Transfer Agreement dated October 12, 2016, (the Agreement), Total Call intends to transfer approximately 3012 wireless customers in Arizona to Boomerang. These Customers currently receive local exchange and long distance wireless Lifeline services from Total Call. Boomerang will not assume any of Total Call's pre-closing liabilities or obligations.

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To ensure a seamless transition and avoid customer confusion or inconvenience, the Parties will provide affected customers with notice at least ten (10) days prior to the transfer, using a form notice substantially similar to the one attached as **Exhibit 1**.

Following consummation of the Transaction, Boomerang will provide the transferred Lifeline customers with services that are improved compared to the plans they currently enjoy on the same underlying wireless network (i.e., acquired customers currently on the Sprint Wireless network will remain on that network). We have filed with Arizona a 500 minutes voice + 100 text + 10 MB plan to which the consumers will be upgraded on their existing phones. This plan also meets the new voice minimum service standard as defined by the FCC's Lifeline Modernization Order,<sup>2</sup> which will be effective December 2, 2016. The consumer will not have to go through an additional plan change in December. Any future changes to the rates, terms and conditions of Boomerang's Lifeline service will be made consistent with Commission requirements. Moreover, because these customers will continue to be served utilizing the same underlying network, they will be able to continue using the same handsets and will enjoy access to the same coverage area.

### III. PUBLIC INTEREST ANALYSIS

The proposed Transaction is in the public interest. Upon consummation, the transferred customers will continue to receive high-quality competitive local exchange and interexchange wireless Lifeline services, now delivered by Boomerang.

The Transaction has no adverse effects for the transferred Customers, who will receive notice in advance of the proposed transfer and may choose to remain with Boomerang or change to a new provider. Total Call and Boomerang will work together to ensure that the affected Customers experience a smooth, virtually seamless, transition.

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<sup>2</sup> See *Lifeline and Link Up Reform and Modernization: Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order).

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**IV. CONCLUSION**

The Parties respectfully request that the Commission note the Transaction for its records. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

**TOTAL CALL MOBILE**

William K. Mosca, Jr.  
Bevan, Mosca & Giuditta, P.C.  
222 Mt Airy Road, Suite 200  
Basking Ridge, NJ 07920  
Tel: (908) 753-8300  
Fax: (908) 753-6423  
Email: [wmosca@bmg.law](mailto:wmosca@bmg.law)

Their Counsel

**BOOMERANG WIRELESS, LLC**



John J. Heitmann  
Joshua T. Guyan  
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Washington, D.C. 20007  
Tel: (202) 342-8566  
Fax: (202) 342-8451  
Email: [jguyan@kelleydrye.com](mailto:jguyan@kelleydrye.com)

Their Counsel

**EXHIBIT 1**

**Sample Customer Notice**



<First\_Name> <Last\_Name>  
<Address 1>  
<Address 2>  
<City>, <State> <Zip>

[DATE]

**RE: YOUR LIFELINE PHONE SERVICE  
PLEASE READ!**

Dear <First\_Name>:

We are pleased to share some exciting news about your wireless Lifeline services. On or shortly after [DATE] your wireless Lifeline phone service, currently provided by Total Call Mobile will be provided by Boomerang Wireless, LLC d/b/a enTouch Wireless. enTouch Wireless is a national provider of wireless services to Lifeline customers. For more information about the company go to [www.enTouchwireless.com](http://www.enTouchwireless.com).

Assuming that you continue to qualify to receive Lifeline service, enTouch Wireless will provide the high level of customer service you expect and have received from Total Call Mobile. We will make the change as seamless as possible. Your service will continue to be provided utilizing the same nationwide network. Following the changeover, you will continue to be enrolled to receive wireless Lifeline-discounted services.

**No action on your part is required.**

You will continue to use the same phone and telephone number you currently have. There will be no fees related to the transfer of your service to enTouch. Following the transfer enTouch will provide you with the following wireless Lifeline services each month:

- **500 voice minutes**
- **100 texts**
- **10 MB of data**

You will still receive this service at no charge. The Top-Up plans now available from Total Call will also still be available. enTouch will send you notices of any future changes to the rates, terms and conditions of your service that are required by law.

You will be notified by enTouch via text message once your service is transferred.

Questions or concerns? Call enTouch at any point at 866.488.8719 or, prior to the transfer, you may also call Total Call Mobile at 1-800-661-7391.

We look forward to serving you!

Sincerely,

Kimberley Lehrman  
President  
Boomerang Wireless, LLC d/b/a enTouch Wireless  
Customer Service: 866.488.8719

Hideki Kato  
COO  
Total Call Mobile  
Customer Service: 1-800-661-7391

**Total Call**  
mobile  
1411 W. 190th Street  
Ste. 650  
Gardena, CA 90248

**OPEN NOW!  
IMPORTANT NOTICE  
ABOUT YOUR PHONE  
SERVICE.**

<First\_Name> <Last\_Name>  
<Address 1>  
<Address 2>  
<City>, <State> <Zip>