

STATE OF MINNESOTA
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

Total Call Mobile, Inc. Petition for Designation
as an Eligible Telecommunications Carrier (Low
Income Only) in Minnesota

Docket No. P6892/M-12-1182

REPLY COMMENTS OF OPEN ACCESS CONNECTIONS

IN RESPONSE TO: *Comments of the Minnesota Department of Commerce Regarding Total Call Mobile, Inc. Petition for Designation as an Eligible Telecommunications Carrier (Low Income Only) in Minnesota.*

Introduction

Open Access Connections¹ has provided free voice mail services to more than 66,000 homeless and low-income Minnesotans since 1994. We are strong supporters of the Lifeline program and many of our voice mail clients also receive Lifeline services. We have submitted numerous comments to the Public Utilities Commission (PUC) on pending Lifeline issues. We are submitting the following reply comments regarding Total Call Mobile's (TCM) petition for designation as an Eligible Telecommunications Carrier (ETC) for the PUC's consideration.

Summary of Offerings

TCM submitted their initial filing for ETC Designation on October 30th, 2012.² According to their initial filing and their website www.totalcallmobile.com, TCM will offer two separate Lifeline plans. The first plan would offer 150 monthly minutes, which can also be used for international calls. Text

¹ Open Access Connections previously submitted comments under the name Twin Cities Community Voice Mail. We formally changed our name to Open Access Connections in the fall of 2010.

² Total Call Mobile Inc., *Petition of Total Call Mobile, Inc, for Designation as an Eligible Telecommunications Carrier*, Docket No. P6892/M-12-1182 (Filed October 30th, 2012).

messages will be offered at a rate of one text message per minute of air time. The second plan will offer 250 monthly minutes and text messages at a rate of one text message per minute of air time. Additional minutes and text messages for both plans are available at a rate of 10 cents per additional minute and 5 cents per additional text. Lifeline customers will also have the option to apply their Lifeline benefit to TCM's regular prepaid plans.

In the comments submitted by the Department of Commerce, TCM plans to offer their Lifeline customers free calls to customer service and Emergency 911 services.³ When Open Access Connections staff called their customer service number 1-800-661-7391, we were able to reach a live representative within 10 minutes.⁴ TCM also pledged to provide usable phones and instruction manuals to their Lifeline customers. TCM also committed to match their Lifeline service offerings if they increase their services in another jurisdiction.

Conclusion

The Lifeline services provided TCM are comparable to other Lifeline programs found within the marketplace. We believe that the rates of adding additional minutes and texts, 10 cents per additional minute and 5 cents per additional text, are competitive and reasonably priced for low-income consumers. We are pleased that TCM plans on offering free calls to customer service and calls to Emergency 911, as we believe that these are essential services for low-income consumers. We are also pleased that TCM is committing to provide usable cell phones, instruction manuals, and automatically match their Lifeline services if they increase their offering in another jurisdiction. Given the information provided by TCM, Open Access Connections believes that granting TCM designation as an ETC is in the public's interest.

³ Department of Commerce, *Comments Regarding Total Call Mobile, Inc. Petition for Designation as an Eligible Telecommunications Carrier (Low Income Only) in Minnesota*, Docket No. P6892/M-12-1182 (Filed June 3rd, 2014).

⁴ Open Access Connections staff called Total Call Mobile customer service on June 5th and June 12th 2014.

June 13, 2014

Mark Erpelding
Executive Director
Open Access Connections
1821 University Avenue
Suite N-184
St. Paul, MN 55104
mark@openaccessconnections.org
651-621-2494