

STATE OF MINNESOTA
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

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American Broadband and Telecommunications Company's Petition for Designation as an Eligible Telecommunications Carrier (Low Income Only) In Minnesota Docket: No. P6898/M-13-675

REPLY COMMENTS OF OPEN ACCESS CONNECTIONS

IN RESPONSE TO: *Initial Filing of American Broadband and Telecommunications Company's Petition for Designation as an Eligible Telecommunications Carrier (Low Income Only) In Minnesota*

Introduction

Open Access Connections¹ has been providing free voice mail services to homeless and low-income Minnesotans since 1994 and have provided voice mail services to more than 65,000 Minnesotans. We are strong supporters of the Lifeline program, and many of our voice mail clients also benefit from the Lifeline program. We have submitted numerous comments to the Public Utilities Commission (PUC) on pending Lifeline issues. We are submitting the following reply comments regarding American Broadband and Telecommunications' (American Broadband) petition for designation as an Eligible Telecommunications Carrier (ETC) for the consideration of the PUC.

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.

Summary of Offerings

American Broadband submitted their initial filing for ETC designation on August 2, 2013. According to their filing and their website, www.americanassistance.com, their Lifeline plan would offer 250 minutes per month along with 250 monthly text messages.² Although 250 minutes monthly minutes is not enough for many low-income consumers to complete many everyday tasks, the service offering provided by American Broadband is consistent with other Lifeline providers and is competitive with what is found on the marketplace. Also, in the comments submitted by the Department of Commerce, American Broad lists an additional Lifeline service offering that would provide 325 monthly minutes and text messaging at a rate of 2 texts per minute of air time.³ Open Access Connections believes that the availability of this additional Lifeline plan will further benefit low-income consumers.

The initial filing and website of American Broadband lists numerous plans for adding additional minutes, with the cheapest plan providing 100 additional talk minutes for \$6.99. Open Access Connections is pleased that every supplemental minute plan provides additional minutes at a rate of less than 10 cents per minute, which we believe is a competitive rate for low-income consumers. Open Access Connections believes that American Broadband's website clearly details their Lifeline monthly plans, their additional minute packages, and their Lifeline application. When Open Access

² American Broadband and Telecommunications Company, *Petition of American Broadband and Telecommunications Company for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Services on a Wireless Basis*, Docket No. P6898/M-13-675(Filed August 2nd, 2013).

³ Department of Commerce, *Comments Regarding Petition of American Broadband and Telecommunications Company for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Services on a Wireless Basis*, Docket No. P6898/M-13-675(Filed April 14th, 2014).

Connections called American Broadband's customer service line, 1-866-966-2628, we were able to reach a live customer service representative quickly.⁴ We are also pleased that American Broadband will offer emergency 911 calls and calls to customer service free of charge, as we believe that these are essential services.⁵

Conclusion

The Lifeline plans of American Broadband are consistent with other Lifeline providers and are competitive with what is found on the open marketplace. We believe that American Broadband provides quality customer service and advertises their Lifeline services clearly. Provided that American Broadband agrees to automatically match their Lifeline offering in Minnesota if they raise their Lifeline offering in another jurisdiction, we believe that American Broadband's ETC application should be approved and is in the public's interest.

April 24, 2014

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⁴ Open Access Connections Staff called American Broadband's customer service line on April 23rd, 2014, and April 24th, 2014.

⁵ Department of Commerce, *Comments Regarding Petition of American Broadband and Telecommunications Company for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Services on a Wireless Basis*, Docket No. P6898/M-13-675(Filed April 14th, 2014).