

August 14, 2017

PUBLIC DOCUMENT

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

RE: **Assist Wireless, Inc. Petition for ETC Designation in Minnesota**
Docket No. P6978/M-17-213

Dear Mr. Wolf:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce in the above-referenced matter.

The petition was filed on March 16, 2017 by:

Jason A. Danowsky
FosterLaw
904 West Avenue, Ste. 107
Austin, TX 78701

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ JOY GULLIKSON
Rate Analyst

JG/lt
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. P6978/M-17-213

I. PROCEDURAL BACKGROUND

On March 16, 2017, Assist Wireless, Inc. (Assist Wireless) filed a petition seeking designation as an Eligible Telecommunication Carrier (ETC) in Minnesota for the purpose of receiving federal universal service support solely for providing Lifeline service to qualified customers.

On three occasions, the Minnesota Public Utilities Commission (Commission) extended the initial period for comments, at the request of the Department of Commerce (Department). The most recent extension requested comments by August 16, 2017.

II. HISTORICAL BACKGROUND

In Docket P999/M-05-1169, the Commission adopted a set of criteria for approval of Eligible Telecommunications Carrier Designation. These criteria are summarized in the chart below. While these criteria are not specific to wireless broadband, they do provide a checklist of areas that the Commission has addressed in previous applications. By order released April 27, 2017, the FCC added criteria regarding wireless broadband speeds—those additions are shown in Criterion 1 in italics.¹ Additionally, through Docket No. P-6920/M-13-1176, the Commission adopted some criteria regarding usable phones offered to Lifeline customers by wireless ETCs. These criteria are shown as Number 15, in the list of criteria below.

¹ *Lifeline and LinkUp Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (FCC rel Apr. 27, 2016) at ¶93.

Table 1. Criteria for Approval of Eligible Telecommunications Carrier Designation

Number	Criterion
1	<p>Common Carriage and Supported Services. The applicant must be a common carrier and commit to providing the following services:</p> <ul style="list-style-type: none"> a. Voice grade access to the public switched telephone network b. Local usage c. Dual tone multi-frequency signaling or its equivalent (touch tone) d. Single-party service or its functional equivalent e. Access to emergency services f. Access to operator services g. Access to interexchange service h. Access to directory assistance i. Toll limitation for qualifying low-income customers (47 USC § 214(e)(1) and 47 CFR § 54.101). j. <i>500MB broadband data per month; beginning December 1, 2017, 1 GB data per month; beginning December 1, 2018, 2GB data per month; TBD by FCC for December 1, 2019 and beyond.</i>
2	<p>Facilities Description. The applicant must file a list and description of the facilities used to provide services throughout the service area for which designation is sought.</p>
3	<p>Facilities Ownership. The applicant must offer services either using its own facilities or a combination of its own facilities and resale of another carrier’s services. (47 USC § 214(e)(1)(A)).</p>
4	<p>Service Provision Requests. The applicant must file a description of how the applicant will fulfill its obligation to provide service upon a customer’s reasonable request.</p>
5	<p>Basic Service Offering. The applicant must file a detailed description of at least one “basic” affordable universal offering with all the supported services.</p>
6	<p>Advertising Plan. The applicant must file a formal plan for advertising the offering and availability of Lifeline and the basic universal service offering throughout the proposed service area.</p>
7	<p>Informational Tariff. The applicant must file an information tariff, or customer service agreement that shows the rates, service plans, cost of related equipment and installation charges, and all the terms and conditions related to the universal service offering.</p>
8	<p>Service Quality Plan. The applicant must file a service quality plan, including commitments and/or disclosures regarding customer service, dispute resolution policies, network maintenance policies, procedures for resolving service interruptions, and any associated customer remedies, and billing, payment, deposit and disconnection policies and procedures.</p>
9	<p>Service Commitment. The applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it will</p> <ul style="list-style-type: none"> 1. Provide service on a timely basis to requesting customers within the applicant’s service areas where the applicant’s network already passes the potential customer’s premises 2. Provide service within a reasonable period of time, if the potential customer is within the applicant’s licensed service area but outside its existing network coverage, if the service can be provided at reasonable cost by <ul style="list-style-type: none"> a. Modifying or replacing the requesting customer’s equipment b. Deploying a roof-mounted antenna or other equipment c. Adjusting the nearest cell tower

	<ul style="list-style-type: none"> d. Adjusting network or customer facilities e. Reselling services from another carriers' facilities to provide service, or f. Employing, leasing or constructing an additional cell site, call extender, repeater, or other similar equipment.
10	Service Improvement Plan. The applicant must submit a two-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis or on a service-area basis throughout its proposed designated area. Each applicant shall demonstrate how signal quality, coverage, or capacity will improve due to the receipt of high-cost support; the specific geographic areas where the improvements will be made; and the estimated population that will be served as a result of the improvements. If an applicant believes that service improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area.
11	Emergency Functionality. The applicant must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
12	Consumer Protection. The applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. Applicants' commitments will be considered on a case-by-case basis.
13	Comparable Usage Plan. The applicant must demonstrate that it offers a local usage plan comparable to the one offered by the incumbent local exchange carrier in the service area for which it seeks designation.
14	Equal Access. The applicant must certify that it acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.
15	<p>Wireless Handsets. The applicant shall provide access to useable phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call, or receive a call under normal circumstances are not acceptable.</p> <ul style="list-style-type: none"> a. Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets must be clear to consumers, and available to consumers who do not have web access. b. The applicant shall provide to the consumer detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options. c. The applicant shall provide cell phone instruction manuals to its Lifeline customers. (Pursuant to Commission Order in Docket No. P-6920/M-13-1176, March 20, 2015).
16	Public Interest. Prior to designating an eligible telecommunications carrier pursuant to section 214(e)(2), the Commission will determine that such designation is in the public interest. In doing so, the Commission shall consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering. In instances where an eligible telecommunications carrier applicant seeks designation below the study area level of a rural telephone company, the Commission shall also conduct a cream skimming analysis that compares the population density of each wire center in which the eligible telecommunications carrier applicant seeks designation against that of the wire centers in the study area in which the eligible telecommunications carrier applicant does not seek designation. In its cream skimming analysis, the Commission shall consider other factors, such as disaggregation of support pursuant to § 54.315 by the incumbent local exchange carrier.

Source: Primarily, Minnesota Public Utilities Commission Staff Briefing Paper, Docket No. P6862/M-11-132, pp 2-4, October 27, 2011.

III. OVERVIEW OF ASSIST WIRELESS FILING

Assist Wireless is a Texas corporation that offers wireless service to its customers. Its “customer base typically will be low-income consumers who qualify for Lifeline service.”² Assist Wireless is registered with the Minnesota Secretary of State as a foreign corporation. Assist has been designated as an ETC by the states of Arkansas, Maryland, Missouri, Oklahoma and Wisconsin. Assist Wireless reports that it has pending ETC applications in California, Illinois, Louisiana, Texas, and Washington.

Assist Wireless does not charge to connect to its network. Instead, the company proposes to offer prepaid packages of talk, text, and data that range from 500 minutes and 500 texts to unlimited talk and text with 2GB of data.

IV. DISCUSSION OF WHETHER ASSIST WIRELESS MEETS THE COMMISSION’S CRITERIA FOR ETC STATUS

Criterion 1.

Common Carriage and Supported Services. The applicant must be a common carrier and commit to providing the following services:

- a. Voice grade access to the public switched telephone network
- b. Local usage
- c. Dual tone multi-frequency signaling or its equivalent (touch tone)
- d. Single-party service or its functional equivalent
- e. Access to emergency services
- f. Access to operator services
- g. Access to interexchange service
- h. Access to directory assistance
- i. Toll limitation for qualifying low-income customers (47 USC § 214(e)(1) and 47 CFR § 54.101).
- j. *500MB broadband data per month; beginning December 1, 2017, 1 GB data per month; beginning December 1, 2018, 2GB data per month; TBD by FCC for December 1, 2019 and beyond.*

² Petition of Assist Wireless, Inc. for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Service on a Wireless Basis. March 16, 2017, p3.

Assist Wireless meets or is attempting to meet all requirements of Criterion 1. Assist wireless will act as a common carrier, pursuant to 47 USC § 153 (10), provide voice grade access to the public switched network and provide local usage via packages of minutes. Assist Wireless will also provide and not charge for access to emergency services, discussed further in Criterion 10. Likewise, Assist Wireless offers its customers Directory Assistance through a third party, and while customers use their minutes to call Directory Assistance, there is no separate charge to access the service. Toll limitation is offered in the sense that customers prepay for a selected number of minutes. No distinction is made between local and toll minutes.

With respect to access to emergency services (item e. above), Assist Wireless states in response to a Department information request that it is seeking certification from the PSAPs in its intended service area and that Assist Wireless intends to file such certifications as soon as it receives them.

In addition to the services listed above, Assist Wireless states that it offers on all its wireless plans:

- A free handset
- Call waiting
- Call forwarding
- 3-way calling
- Voicemail³.

Criterion 2.

Facilities Description. The applicant must file a list and description of the facilities used to provide services throughout the service area for which designation is sought.

Assist Wireless's application, Confidential Exhibit 2, describes the facilities Assist Wireless uses to provide service. The switching is performed under Assist Wireless's exclusively leased facilities, while the network elements are provided by other carriers, primarily Sprint and T Mobile.

Criterion 3

Facilities Ownership. The applicant must offer services either using its own facilities or a combination of its own facilities and resale of another carrier's services. (47 USC § 214(e)(1)(A)).

³ Assist Wireless application, March 16, 2017, p.4.

As stated above, Assist Wireless's switching is provided through leased equipment that is entirely under Assist Wireless' exclusive control, and for which Assist Wireless maintains that it meets the FCC requirement in Section 254 of the Act and further defined *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157 (rel. May 8, 1997). Assist Wireless offers transport facilities through the services of a nationwide carrier.

To explain that "own facilities" is not necessarily synonymous with holding title, Assist Wireless's Confidential Exhibit 2 quotes the FCC:

[W]e note that section 214(e)(1) uses the term "own facilities" and does not refer to facilities "owned by" a carrier. We conclude that this distinction is salient based on our finding that, unlike the term "owned by," the term "own facilities," reasonably could refer to property that a carrier considers its own, such as unbundled network elements, but to which the carrier does not hold absolute title."⁴

While the FCC has not altered its 1997 definition of "own" in terms of further restriction, it has opened the question to include whether the FCC should also consider "own" to include shared facilities."⁵ To date, the FCC has not made any ruling altering the definition of "own" either to further restrict or to open up the definition.

Criterion 4

Service Provision Requests. The applicant must file a description of how the applicant will fulfill its obligation to provide service upon a customer's reasonable request.

Assist Wireless states in response to Commerce Information Request No. 5, shown as **Attachment 1:**

⁴ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157 (rel May 8, 1997) para. 151.

⁵ See for example, *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (FCC rel. Feb 6, 2012) para. 501. Where the FCC stated: "The Commission has also held that if an ETC leases facilities from another carrier and uses such facilities to provision the USF supported services, the ETC has exclusive rights to those facilities and therefore "owns" the facilities as required under section 214(e)(1)(A). If the ETC leases facilities jointly with one or more carriers that it uses to provision the supported services, does that ETC have exclusive right to use the facilities? To provide further guidance for the designation process, is it necessary for the Commission to clarify what is meant by requiring that a facilities-based ETC have exclusive right to use facilities in the provisioning of the supported services?"

“If a customer is unable to receive service from Assist, then that customer’s line will be provisioned by utilizing elements from a different national wireless network provider with Assist’s network configuration in order to ensure that the customer receives service.”

Criterion 5

Basic Service Offering. The applicant must file a detailed description of at least one “basic” affordable universal offering with all the supported services.

Assist Wireless has not yet filed an informational tariff, but did file a spreadsheet showing that Assist Wireless intends to offer as its base lifeline service 50 minutes of talk, 100 texts, and 500 MB of data. For Lifeline customers, there is no charge for this service—for prepaid customers, the charge is \$9.25 per month.

Criterion 6

Advertising Plan. The applicant must file a formal plan for advertising the offering and availability of Lifeline and the basic universal service offering throughout the proposed service area.

In response to Commerce Information Request # 11, Assist Wireless filed its 2017-2018 Marketing Plan. This Marketing Plan is attached as Trade Secret **Attachment 2**. To provide reference, **Attachment 3** is a graphic depiction of the different television marketing areas in Minnesota. Assist Wireless plans to serve much of the state of Minnesota, as depicted in the map provided by Assist Wireless, in response to Commerce Information Request #6, shown in Trade Secret **Attachment 4**.

It appears from the marketing plan that Assist Wireless does not have adequate marketing efforts in the Fargo, Mankato, or Rochester areas. The Department recommends that Assist Wireless file a more detailed plan that addresses its outreach plan to the rural areas of Minnesota.

Criterion 7

Informational Tariff. The applicant must file an information tariff, or customer service agreement that shows the rates, service plans, cost of related equipment and installation charges, and all the terms and conditions related to the universal service offering.

Assist Wireless indicates that it will file an informational tariff, but would prefer to keep the tariff online. The Department recommends that the Commission require the company to file a tariff that conforms to the requirements of the Commission’s order in this matter within 30 days of the release of the order.

Criterion 8

Service Quality Plan. The applicant must file a service quality plan, including commitments and/or disclosures regarding customer service, dispute resolution policies, network maintenance policies, procedures for resolving service interruptions, and any associated customer remedies, and billing, payment, deposit and disconnection policies and procedures.

In a previous application for ETC status⁶ the applicant agreed to abide by the terms of the Cellular Telecommunications and Internet Association's (CTIA's) Consumer Code for Wireless Service. A current version of this Code is shown in Attachment 3. In this matter, Assist Wireless has not filed a service quality plan, but it has pledged to comply with the CTIA Consumer Code.⁷ The Department recommends that the Commission order that the CTIA Consumer Code be attached to Assist Wireless's informational tariff.

Criterion 9.

Service Commitment. The applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it will:

Provide service on a timely basis to requesting customers within the applicant's service areas where the applicant's network already passes the potential customer's premises
Provide service within a reasonable period of time, if the potential customer is within the applicant's licensed service area but outside its existing network coverage, if the service can be provided at reasonable cost by:

- a. Modifying or replacing the requesting customer's equipment
- b. Deploying a roof-mounted antenna or other equipment
- c. Adjusting the nearest cell tower
- d. Adjusting network or customer facilities
- e. Reselling services from another carriers' facilities to provide service, or
- f. Employing, leasing or constructing an additional cell site, call extender, repeater, or other similar equipment.

Assist Wireless commits to serving a customer through purchasing network elements from other carriers if needed.

Criterion 10

Service Improvement Plan. The applicant must submit a two-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis or on a service-area basis throughout its proposed designated area. Each

⁶ See P-6862/M-11-132, Telrite Corporation, Staff Briefing Papers ,

⁷ See Assist Wireless application, page 12.

applicant shall demonstrate how signal quality, coverage, or capacity will improve due to the receipt of high-cost support; the specific geographic areas where the improvements will be made; and the estimated population that will be served as a result of the improvements. If an applicant believes that service improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area.

Assist Wireless has not provided any information concerning their improvement plan. Since Assist Wireless is offering its service through agreements with other nationwide carriers, any service improvement plan may be dependent on service improvement plans of those other carriers. However, to satisfy this requirement, the Department recommends that Assist Wireless' approval be contingent upon submission of a two-year plan within 30 days of the Commission's Order in this matter, with whatever information it is able to provide.

Criterion 11

Emergency Functionality. The applicant must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Assist Wireless maintains that it uses its own facilities plus unbundled network elements, including emergency services, of the national networks of Sprint or T Mobile. Assist Wireless states "Sprint and T Mobile comply with applicable requirements for emergency service, including available power supplies."⁸ In addition to using the previously authorized services of underlying carriers, Assist Wireless is applying for certification from all PSAPs in its Minnesota serving area.

Criterion 12

Consumer Protection. The applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. Applicants' commitments will be considered on a case-by-case basis.

Assist Wireless pledges to provide quality service, and to comply with the CTIA Consumer Code and applicable Minnesota rules on consumer protection and service quality standards. Application at p. 12.

⁸ Assist Wireless Application, page 11.

Criterion 13

Comparable Usage Plan. The applicant must demonstrate that it offers a local usage plan comparable to the one offered by the incumbent local exchange carrier in the service area for which it seeks designation.

Because Assist Wireless offers wireless service and broadband access—its services are not completely comparable to landline offerings. The Department believes that the Assist Wireless offering is adequate and offers sufficient local and long distance service through the number of minutes it offers. Assist Wireless’s monthly offerings for Lifeline customers includes 50 minutes of talk (100 texts) and 500 MB of data for no charge. Assist Wireless also offers 500 minutes of talk (8.33 hours) and 500 texts per month for no charge. Various other offerings, including unlimited talk and unlimited text are available for various monthly fees, and are included in Assist Wireless’s application.

In addition, the Department recommends that the Commission order, as it has ordered previously, that Assist Wireless commit to have its terms, rate, and conditions match the best terms, rates and conditions offered in other jurisdictions⁹.

Criterion 14

Equal Access. The applicant must certify that it acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

Assist Wireless certifies that it understands the Commission may require it to provide equal access in the even that no other eligible telecommunications carrier provides equal access in Assist Wireless’s service area.

Criterion 15

Wireless Handset Criteria

The applicant shall provide access to useable phones. Frequent static or other interference on the line, lack of clarity, dropped calls, inability to place a call, or receive a call under normal circumstances are not acceptable.

- a. Policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets must be clear to consumers, and available to consumers who do not have web access.
- b. The applicant shall provide to the consumer detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.

⁹ See, for example *In the Matter of the Notice of a Planned Transaction Whereby the Ownership of TerraCom, Inc. (TerraCom) Will Change*, Docket No. P-6861/PA-16-767, ordering paragraph #8. October 28, 2016.

- c. The applicant shall provide cell phone instruction manuals to its Lifeline customers.

Assist Wireless provided no information concerning the quality of its handsets, or its replacement policy.

V. PUBLIC INTEREST (Criterion 16)

Prior to designating an eligible telecommunications carrier pursuant to section 214(e)(2), the Commission needs to determine that such designation is in the public interest. In doing so, the Commission shall consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering. In instances where an eligible telecommunications carrier applicant seeks designation below the study area level of a rural telephone company, the Commission shall also conduct a cream skimming analysis that compares the population density of each wire center in which the eligible telecommunications carrier applicant seeks designation against that of the wire centers in the study area in which the eligible telecommunications carrier applicant does not seek designation. In its cream skimming analysis, the Commission shall consider other factors, such as disaggregation of support pursuant to § 54.315 by the incumbent local exchange carrier.

Assist Wireless is not requesting designation in an area smaller than a study area. In other respects, the Department believes that if the conditional criteria are met, the Commission should find that Assist Wireless serves the public interest.

VI. COMMISSION ALTERNATIVES

1. Grant ETC status after Assist Wireless completes the following requirements:
 - a. Submit all 911 certifications (criteria 1 and 11);
 - b. Within 30 days of the Commission order in this matter, submit an update to its advertising plan that addresses outreach in the Fargo, Mankato and Rochester markets (criterion 6);
 - c. Within 30 days of the Commission order in this matter, submit its informational tariff (criterion 7);
 - d. Include in its information tariff Assist Wireless's commitment to follow the CTIA's Consumer Code for Wireless Service and include a copy of the code (criterion 8);
 - e. Within 30 days of the Commission order in this matter submit its service improvement plan covering the next two years with whatever information Assist Wireless is able to provide.

- f. Agree to provide rate, terms, and conditions that match the best terms, rates and conditions offered in other jurisdictions.
 - g. Within 30 days of the Commission order in this matter, submit proposed policies regarding repair, maintenance, replacement of handsets, batteries, and chargers and options to purchase handsets must be clear to consumers, and available to consumers who do not have web access.
 - h. Agree to provide the customer the detailed information in writing, at the time of enrollment, of repair and replacement policies for phones and accessories (batteries, chargers) and purchase options.
 - i. Agree to provide cell phone instruction manuals to its Lifeline customers.
 - j. Within 30 days of this Order, Assist Wireless must file a copy of the instructional materials that it provides to its Lifeline customers.
2. Deny ETC status to Assist Wireless

VII. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission adopt Alternative 1 and grant ETC status conditioned upon the requirements listed above.

/lt

Minnesota Department of Commerce
Information Request

Docket Number: P6978/M-17-213 Nonpublic Public
Requested From: Jason Danowsky, FosterLaw Date of Request: 5/24/2017
on behalf of Assist Wireless, Inc.
Type of Inquiry: General Response Due: 6/5/2017
Requested by: Joy Gullikson
Email Address(es): joy.gullikson@state.mn.us
Phone Number(s): 651-539-1877

Request Number: 5
Topic: NA
Reference(s): NA

Request:

Please explain how Assist Wireless will fulfill its obligation to provide service upon a customer's reasonable request at any location within the service areas provided, but in which Assist Wireless does not currently have service.

RESPONSE:

If a customer is unable to receive service from Assist, then that customer's line will be provisioned by utilizing elements from a different national wireless network provider within Assist's network configuration in order to ensure that the customer receives service.

Response Date:
Response by: Kelly King and Jason Danowsky
Email Address: jason@mfoosterlaw.com
Phone Number: 512-708-8700

Minnesota Department of Commerce
Information Request

Attachment 2
P6978/M-17-213
PUBLIC COPY

Docket Number: P6978/M-17-213 Nonpublic Public
Requested From: Jason Danowsky, FosterLaw Date of Request: 5/24/2017
 on behalf of Assist Wireless, Inc.
Type of Inquiry: General Response Due: 6/5/2017

Requested by: Joy Gullikson
Email Address(es): joy.gullikson@state.mn.us
Phone Number(s): 651-539-1877

Request Number: 11
Topic: NA
Reference(s): NA

Request:

Please provide a specific advertising/outreach plan. Please list the specific means by which Assist Wireless will advertise the availability of its services, and the availability of Lifeline throughout its designated service area. Please include specific newspapers, radio stations, and any other media of general distribution that Assist Wireless intends to use in Minnesota. Please include information with respect to the frequency and timing of such advertisements. Please describe Assist Wireless's 'outreach' program and the specific locations and low-income community services where Assist Wireless will promote the availability of Lifeline.

RESPONSE:

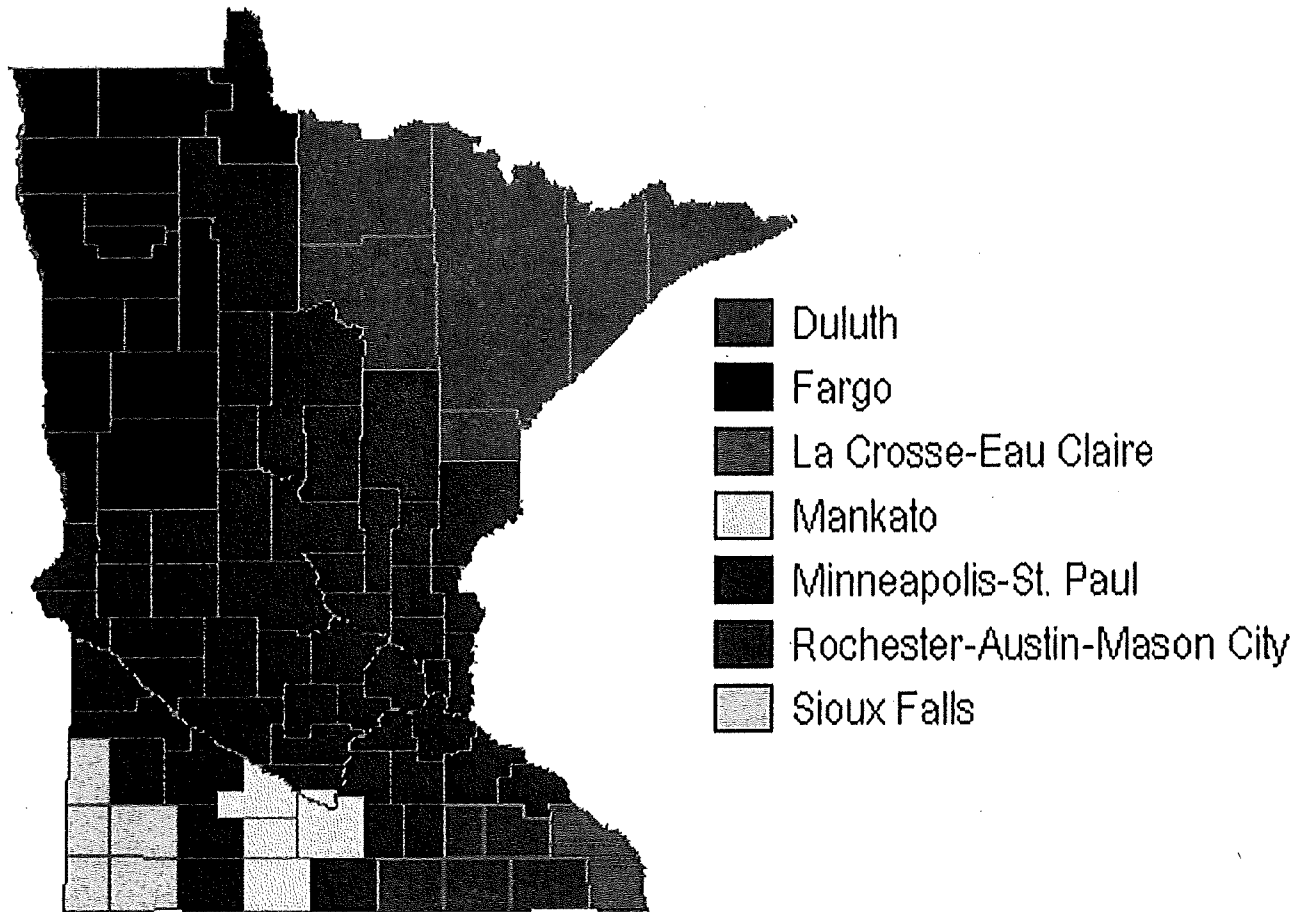
Please see Assist's advertising plan attached as *Attachment C*.

Response Date:
Response by: Kelly King and Jason Danowsky
Email Address: jason@mfoosterlaw.com
Phone Number: 512-708-8700

ATTACHMENT C

TRADE SECRET I NFORMATION HAS BEEN REMOVED

Television Direct Marketing Areas of Minnesota



Source: <http://www.northpine.com/broadcast/mn/tvmarkets.gif>

Minnesota Department of Commerce
Information Request

Attachment 4
P-6978/M-17-213
PUBLIC VERSION

Docket Number: P6978/M-17-213 Nonpublic Public
Requested From: Jason Danowsky, FosterLaw Date of Request: 5/24/2017
on behalf of Assist Wireless, Inc.
Type of Inquiry: General Response Due: 6/5/2017
Requested by: Joy Gullikson
Email Address(es): joy.gullikson@state.mn.us
Phone Number(s): 651-539-1877

Request Number: 6
Topic: NA
Reference(s): NA

Request:

Please provide a map of the proposed service areas as provided in Exhibit 3 of Assist Wireless's application.

RESPONSE:

Please see Assist's proposed service area as supported by Assist's national wireless network carrier, attached as *Attachment B*.

Response Date:
Response by: Kelly King and Jason Danowsky
Email Address: jason@mfoosterlaw.com
Phone Number: 512-708-8700