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651.539.1500 FAX 651.539.1547  
An equal opportunity employer

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February 25, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Total Call Mobile, Inc. (TCM) Petition for Designation as an Eligible  
Telecommunications Carrier (Low Income Only) in Minnesota  
Docket No. P6892/M-12-1182

Dear Dr. Haar:

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

The petition was filed on October 29, 2012 by:

Hideki Kato  
Chief Operating officer for Total Call Mobile

and

Robert Yap, Esq.  
Chief Administrative Officer and General Counsel  
Total Call International, Inc.

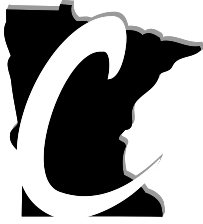
1411 W. 190<sup>th</sup> St., Suite 700  
Gardena, CA 90248

The Department recommends that the Commission find that the petition, as filed, is incomplete. The Commission should deny the petition without prejudice and close the docket.

Sincerely,

/s/ KATHERINE DOHERTY  
Rates Analyst

KD/lt  
Attachment



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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. P6892/M-12-1182

**I. DEPARTMENT COMMENTS**

On October 29, 2012, Total Call Mobile, Inc. (TCM) filed a petition seeking designation as an Eligible Telecommunications Carrier (ETC) in Minnesota for the purpose of receiving federal universal service support solely for providing Lifeline (and Linkup) service to qualified customers.

Between November 2012 and August 2013, the Minnesota Public Utilities Commission (Commission) extended the initial comment period several times, at the request of the Department of Commerce.

On September 16, 2013, the Minnesota Department of Commerce (Department) filed a letter indicating that it had not received responses to its second and third requests for information from TCM (sent May 29 and May 30, 2013), and that the petition could not be considered complete until responses had been received. The outstanding information requests were due on June 10 and June 11, 2013. TCM did not request an extension of time to file its responses.<sup>1</sup> The Department contacted the company and confirmed that the information requests had been received.

Since that time, the comment period has been extended, at the Department's request, to February 25, 2014.

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<sup>1</sup> The Department notes that, in TCM's May 24, 2013 response to IR#17, TCM requested an extension without specifying a date, to respond to the Department's request that TCM provide an informational tariff. TCM indicated that it would "supplement its response to this request as soon as it is able to collect and provide the required information," (see Attachment 1). To date, no informational tariff or draft has been provided, nor has TCM indicated since then whether, and if so when, it will do so.

To date, no further information has been provided by TCM, nor has TCM contacted the Department. Further, the Department has confirmed with the Department of Public Safety (DPS) that TCM has not contacted the agency nor provided sample handsets to begin DPS' certification process. As the Department indicated in its September 16, 2013 letter, the Department does not believe that the petition can be considered complete until full responses have been provided.

TCM's responses to the Department's initial set of IRs are attached as Attachment 1. Attachment 2 contains the unanswered information requests (sets 2 and 3).

The unanswered information requests seek data or clarifications with respect to TCM's marketing and advertising processes and plans in Minnesota, TCM's commitment to provide service upon request to qualified requesting customers, TCM's informational tariff (which should include all terms, conditions, and rates applicable to its Lifeline offering), TCM's ability to remain functional in emergency situations, and whether TCM commits to offer, in Minnesota, the highest number of free minutes of usage offered in any jurisdiction by TCM.

## **II. CONCLUSION**

The Department believes that full answers to these questions are necessary for the Commission to critically evaluate whether TCM has the intent and capability of providing and advertising Lifeline service to qualified consumers in Minnesota. The answers are also necessary to demonstrate that designating Total Call as an ETC in Minnesota is in the public interest.

The Department recommends, therefore, that the Commission deny the petition without prejudice, and close the docket. TCM may reapply at such time that full information can be provided.

## **I. COMMISSION ALTERNATIVES**

- A. Find that TCM has not provided sufficient information for the petition to be considered complete. Deny the petition without prejudice, and close the docket.
- B. Other action as determined by the Commission.

## **II. DEPARTMENT RECOMMENDATION**

The Department recommends alternative A. The Commission should find that TCM has not provided sufficient information for the petition to be considered complete. Deny the petition without prejudice, and close the docket.

**ATTACHMENT 1 -PUBLIC**  
**TRADE SECRET INFORMATION HAS BEEN**  
**EXCISED**

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

Date of Request: May 14, 2013

Requested From: Hideki Kato/Robert Yap  
Total Call Mobile

Response Due: May 24, 2013

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    .....Financial            .....Rate of Return            .....Rate Design  
                          .....Engineering            .....Forecasting            .....Conservation  
                          .....Cost of Service            .....CIP                        .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	Please provide an advertising plan listing the specific means by which Total Call will advertise the availability of its services throughout its designated service area. Please include specific newspapers, radio or television stations, and any other media of general distribution that TAG intends to use in Minnesota. Please include information with respect to the frequency and timing of such advertisements. Please describe TAG's outreach program and the specific locations and low-income community services where TAG will promote the availability of Lifeline service.

**Response to Request No. 1: CONFIDENTIAL AND PROPRIETARY – TRADE SECRET AND PRIVILEGED. [REDACTED]**

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

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                         .....Engineering            .....Forecasting            .....Conservation  
                         .....Cost of Service            .....CIP            .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
2	Please describe the process by which Total Call will account for and submit 911 and Telecommunications Access Minnesota (TAM) fees from all of its end user customers, including its Lifeline customers.

**Response to Request No. 2:** TCM utilizes a tax rating software in order to calculate and account for 911 and TAM fees from its end user customers, including its Lifeline customers.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
3	<p>Although the FCC determined that it would no longer require Lifeline-only ETC applicants (in petitions brought before the FCC) to obtain certification from each PSAP that the applicants' phones are 911 and E911 compliant, it preserved states' rights to do so. The Minnesota Department of Public Safety (DPS) conducts a streamlined review on behalf of all Minnesota PSAPS, requiring that the applicant submit a sample handset for testing to ensure that the applicant's handsets are 911 and E911 capable regardless of the activation status of the phone, and the availability of minutes. DPS also requires certification from the carrier that it will pay appropriately into the Minnesota State 911 fund.</p> <p>Has Total Call received certification from DPS, or started the certification process?</p> <p>If not please contact DPS to begin the testing and certification process. Total Call should contact:</p> <p style="padding-left: 40px;">Dana Wahlberg State of Minnesota 911 Program Manager Department of Public Safety Office: 651-201-7546 Web Address: <a href="mailto:Dana.Wahlberg@state.mn.us">Dana.Wahlberg@state.mn.us</a></p> <p>Total Call will need to complete DPS' certification process prior to operating in Minnesota.</p>

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
4	Total Call states on page 26 of its petition that calls to customer service will be free. Does Total Call also provide its subscribers with a toll-free number that can be called from any telephone that potential or current customers can call with questions or concerns or to request information?

**Response to Request No. 4:** Yes. The toll-free number to contact TCM with any questions or concerns or to request information is 800-550-5265.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

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                          .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
5	What is that toll free number?

**Response to Request No. 5:** The toll-free number is 800-550-5265.

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Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

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                         .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
6	How are potential and existing customers made aware of the toll free number?

**Response to Request No. 6:** The TCM toll free number is displayed on print advertisements, brochures, and posters for TCM's Lifeline services. Further, employees and agents of TCM will inform inquiring individuals at live, in-person events of the availability of the toll free number in the event the potential and existing customers have additional questions or concerns. Finally, the toll free number is displayed on the TCM website for its Lifeline services.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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                          .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
7	Please explain how Total Call will inform its Lifeline customers of the availability of the Minnesota Commission for assistance in resolving disputes or complaints.

**Response to Request No. 7:** TCM intends to inform its Lifeline customers of the availability of the Minnesota Commission for assistance in resolving disputes or complaints by including this information in its Minnesota-specific application forms and brochures. TCM will also train customer service, which is available 24 hours a day, 7 days a week, to inform Minnesota customers that the Minnesota Commission is available to assist in resolving disputes and complaints.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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                          .....Cost of Service                    .....CIP                                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
8	Please list all makes and models of "free" handsets that Total Call provides to its Lifeline customers.

**Response to Request No. 8:** Please be advised that this list may change from time to time depending upon handset availability. However, at this time, the "free" handsets provided include: LG 125, LG 225, LG 260, LG 325, Sanyo PRO700, Samsung M370, Samsung M540, Samsung M360, Palm 100, Palm 690, Samsung M400, Samsung M380, Sanyo S1, Motorola V950, Kyocera E4277, Sanyo 3200, and Sanyo 6600

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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                          .....Cost of Service            .....CIP                        .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
9	Does Total Call provide refurbished handsets or new handsets? If both, please provide the approximate percentage of phones that are provided new.

**Response to Request No. 9:** TCM estimates that more than 90 percent of the Lifeline handsets provided by TCM are refurbished. Customers, however, have the option of paying an additional fee to upgrade their free Lifeline handsets to a higher model or new handset.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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                          .....Cost of Service                    .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
10	Does Total Call provide cell phone instruction manuals with all handsets it provides or sells to Lifeline customers at the time of enrollment?

**Response to Request No. 10:** Yes, TCM provides a "Getting Started" booklet that contains instructions on handset operation and use, as well as TCM's Terms & Conditions. Manuals can also be found online at [totalcallmobile.com](http://totalcallmobile.com)

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

Date of Request: May 14, 2013

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Analyst Requesting Information: Katherine Doherty

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                         .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
12	If a customer's phone is lost or stolen, how does the customer obtain a replacement?

**Response to Request No. 12:** A customer who loses his or her phone or has his or her phone stolen may obtain a replacement by contacting TCM customer service and paying a fee for a new phone.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

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Total Call Mobile

Response Due: May 24, 2013

Analyst Requesting Information: Katherine Doherty

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                         .....Engineering            .....Forecasting            ..... Conservation  
                         .....Cost of Service            .....CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
13	Please provide a copy of Total Call's policy for repair/replacement of defective handsets.

**Response to Request No. 13:** TCM's policy for repair/replacement of defective handsets is that the Company will replace such handsets if they are defective within 90 days of first use. The customer must send the handset in at their own cost; however, as long as the handset is not damaged due to abuse or from water, the Company will send a new handset to the customer at the Company's own cost. After 90 days of first use, the customer must pay to replace their handset. The price for replacing the handset varies depending on the type of handset they choose.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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Total Call Mobile

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                         .....Cost of Service            .....CIP                    ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
14	Does Total Call provide free hearing-aid compatible sets to hard of hearing Lifeline eligible customers?

**Response to Request No. 14:** Yes, TCM provides hearing-aid compatible handsets which can be used by Lifeline eligible customers who are hard of hearing. The list of all hearing aid-compatible handsets offered by TCM is available at TCM's website (totalcallmobile.com).

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

Date of Request: May 14, 2013

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Analyst Requesting Information: Katherine Doherty

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                          .....Engineering            .....Forecasting            .....Conservation  
                          .....Cost of Service            .....CIP                        .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
15	Please provide Total Call's most recently available financial statements (Income and balance sheets).

**Response to Request No. 15: CONFIDENTIAL AND PROPRIETARY – TRADE SECRET AND PRIVILEGED. [REDACTED]**

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P6892/M-12-1182

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Analyst Requesting Information: Katherine Doherty

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                          .....Engineering            .....Forecasting            .....Conservation  
                          .....Cost of Service            .....CIP                        .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
16	Please list all agents and retailers that Total Call will use in Minnesota to distribute phones and/or enroll Lifeline subscribers in Minnesota.

**Response to Request No. 16: CONFIDENTIAL AND PROPRIETARY – TRADE SECRET AND PRIVILEGED. [REDACTED]**

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

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                         .....Engineering            .....Forecasting            .....Conservation  
                         .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
17	<p>Please provide an informational tariff for the purpose of disclosure, and to memorialize commitments that Total Call has made, that includes the following:</p> <ul style="list-style-type: none"><li>• All rates associated with the universal service offering, including the cost of all equipment and installation charges and all other recurring and non-recurring charges.</li><li>• All terms and conditions of service associated with its universal service offering.</li><li>• Other services which may be added to the universal service offering.</li><li>• The specific exchange areas in which the ETC offers service.</li><li>• Commitment to provide clear notice to consumers of the Commission's contact information and the availability of this Commission in addressing customer questions, concerns, comments, and complaints.</li></ul>

**Response to Request No. 17:** TCM hereby requests an extension to respond to this request. TCM will supplement its response to this request as soon as it is able to collect and provide the required information.

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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                          .....Cost of Service            .....CIP                    .....Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
18	Are Total Call Lifeline customers charged "roaming" charges?

**Response to Request No. 18:** No, TCM Lifeline customers are not charged "roaming" charges because TCM blocks roaming for its prepaid customers (i.e. roaming is not available with prepaid services).

Response by: Nathaniel Law

List sources of information:

Title: Associate General Counsel

Department: Legal Department

Telephone: 310-818-4300

# **ATTACHMENT 2**



85 7th Place East, Suite 500  
St. Paul, Minnesota 55101-2198  
www.commerce.state.mn.us  
651.296.4026 FAX 651.297.1959  
An equal opportunity employer

May 29, 2013

Robert Yap  
Total Call Mobile, Inc.  
1411 West 190th Street, Suite 700  
Gardena, CA 90248

**RE: DOCKET NO. P6892/M-12-1182**

**NATURE OF DOCKET: Designation as an Eligible Telecommunications Carrier (ETC)**

Dear Mr. Yap:

Enclosed please find the Department of Commerce information request number (s) 19 - 23 in the above cited docket number. Please send me all responses in a searchable PDF format to [alex.hofschulte@state.mn.us](mailto:alex.hofschulte@state.mn.us). If responding to more than one question, please make each response a separate file. If requested by the analyst to send something by CD-ROM please send it to me at the following address:

Mr. Alexius M. Hofschulte  
Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

Please indicate the above cited docket number, the corresponding request number, the requesting analyst, and the respondent's name and title on your response. If your response contains Trade Secret data, please include a public copy.

If you have any questions or problems providing information in the time specified, please contact me at (651) 296-9314 and I will direct you to the analyst requesting the information.

Respectfully submitted,

Alexius M. Hofschulte  
Regulatory Information Center  
Enc.



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

Utility Information Request

Docket Number: P6892/M-12-1182

Date of Request: May 29, 2013

Requested From: Hideki Kato / Total Call Mobile  
Robert Yap / Total Call Mobile

Response Due: June 10, 2013

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    ..... Financial            ..... Rate of Return            ..... Rate Design  
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                           ..... Cost of Service            ..... CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
19	<p>In response to Information Request #1, Total Call Mobile (TCM or Total Call) states that it “ will advertise its services throughout its designated service area through its agent and distribution networks.”</p> <p>In response to IR#16 (“Please list all agents and retailers that Total Call will use in Minnesota to distribute phones and/or enroll Lifeline subscribers in Minnesota”), Total Call indicates that it intends to utilize its own employees in addition to its agent and distributor networks, which, while not based in Minnesota, have relationships with Minnesota-based distributors, stores and retail outlets to distribute phones and/or enroll Lifeline subscribers in Minnesota.</p> <p>a) Please list, specifically, by name, the agents and distributor networks not based in Minnesota which Total Call intends to utilize.</p> <p>b) Please also list, by name, the Minnesota-based distributors, stores, and retail outlets with whom Total Call’s agents and distributors have relationships, and who will distribute Total Call phones and enroll Lifeline subscribers.</p>

---

Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Department: \_\_\_\_\_  
 Telephone: \_\_\_\_\_

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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Docket Number: P6892/M-12-1182

Date of Request: May 29, 2013

Requested From: Hideki Kato / Total Call Mobile  
Robert Yap / Total Call Mobile

Response Due: June 10, 2013

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    ..... Financial            ..... Rate of Return            ..... Rate Design  
                         ..... Engineering            ..... Forecasting            ..... Conservation  
                         ..... Cost of Service            ..... CIP            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
20	TCM also states in its response to IR#1 that it will promote its Lifeline services through in-person sales events staffed by TCM representatives or agents.  a) Please list any and all agents with whom TCM contracts or will contract to conduct such events in Minnesota.

---

Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
21	TCM states in response to IR#10 that it provides a "Getting Started" booklet that contains instructions on handset operation and use, as well as TCM's Terms & Conditions.  a) Does the "Getting Started" booklet include a complete cell phone manual? b) If not, how can a customer who does not have access to the internet get a copy of the manual? c) Please provide a copy of the "Getting Started" booklet that contains instructions on handset operation and use, as well as TCM's Terms & Conditions.

---

Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
Title: \_\_\_\_\_  
Department: \_\_\_\_\_  
Telephone: \_\_\_\_\_

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
22	<p>TCM states, on page 15 of its initial petition, that “subject to handset availability,” it commits to provide the supported services on a timely basis to qualified requesting customers within its designated service area.</p> <p>a) Please describe the circumstances under which Total Call would not be able to provide service to a requesting customer due to the unavailability of a handset.</p> <p>b) If Total Call is unable to fulfill a customer’s request due to the unavailability of a handset, is the customer turned away? If not, how does Total Call handle the customer’s request?</p>

---

Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

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Request No.	
23	<p>Total call states, on page 16 of its petition, that “[t]hrough its agreement with its underlying carrier [Sprint], Total Call will provide its customers with the same ability to remain functional in emergency situations as is currently provided <i>by the ILECs</i> to their own customers.”</p> <p>a) Does Total Call mean to say that Total Call will provide its customers with the same ability to remain functional in emergency situations as is currently provided <i>by its underlying carrier [Sprint]</i> to its own customers?</p> <p>b) If not, please explain how the agreement with Sprint provides Total Call the ability to provide its customers with the same ability to remain functional in emergency situations as is currently provided <i>by the ILECs</i> to their own customers. To which ILEC(s) specifically does Total Call refer?</p>

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Response by: _____	List sources of information: _____
Title: _____	_____
Department: _____	_____
Telephone: _____	_____



85 7th Place East, Suite 500  
St. Paul, Minnesota 55101-2198  
www.commerce.state.mn.us  
651.296.4026 FAX 651.297.1959  
An equal opportunity employer

May 30, 2013

Robert Yap  
Total Call Mobile, Inc.  
1411 West 190th Street, Suite 700  
Gardena, CA 90248

**RE: DOCKET NO. P6892/M-12-1182**

**NATURE OF DOCKET: Designation as an Eligible Telecommunications Carrier (ETC)**

Dear Mr. Yap:

Enclosed please find the Department of Commerce information request number (s) **24 - 28** in the above cited docket number. Please send me all responses in a searchable PDF format to [alex.hofschulte@state.mn.us](mailto:alex.hofschulte@state.mn.us). If responding to more than one question, please make each response a separate file. If requested by the analyst to send something by CD-ROM please send it to me at the following address:

Mr. Alexius M. Hofschulte  
Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

Please indicate the above cited docket number, the corresponding request number, the requesting analyst, and the respondent's name and title on your response. If your response contains Trade Secret data, please include a public copy.

If you have any questions or problems providing information in the time specified, please contact me at (651) 296-9314 and I will direct you to the analyst requesting the information.

Respectfully submitted,

Alexius M. Hofschulte  
Regulatory Information Center  
Enc.

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

**Utility Information Request**

Docket Number: P6892/M-12-1182

Date of Request: May 30, 2013

Requested From: Hideki Kato, Total Call Mobile  
 Robert Yap, Total Call Mobile

Response Due: June 11, 2013

Analyst Requesting Information: Katherine Doherty

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                          ..... Cost of Service                      ..... CIP                      ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
24	<p>If designated as an ETC on a conditional basis, will TCM commit to file a formal advertising plan with additional details about its marketing plan within 30 days of the Commission's order? The plan should include details about the frequency of advertising and the frequency of "marketing events," a description of how the "marketing events" will be conducted, including when, by whom, and where, the specific information that will be communicated to consumers, the method that will be used to communicate said information, TCM website information, and any other specific method by which TCM will advertise the availability of Lifeline service and, specifically, TCM's Lifeline offerings?</p>

---

Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Department: \_\_\_\_\_  
 Telephone: \_\_\_\_\_

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
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                          ..... Cost of Service            ..... CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
25	Does TCM intend to serve qualified customers on tribal lands?  If yes, does TCM intend to claim enhanced Lifeline support (as described in 47 C.F.R. 54) for serving those customers?  If yes, does TCM propose an enhanced Lifeline offering for customers on tribal lands within its designated service area that would allow TCM to collect enhanced support and to certify that it will pass the full amount of the support it receives to the tribal customer?

---

Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
Title: \_\_\_\_\_  
Department: \_\_\_\_\_  
Telephone: \_\_\_\_\_



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
26	Does TCM commit to offer, in Minnesota, the highest number of free minutes of usage offered in any jurisdiction by TCM, and supplementary minutes offered at the lowest price offered in any other jurisdiction in which TCM provides wireless Lifeline service, provided that the available support is the same?

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Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Department: \_\_\_\_\_  
 Telephone: \_\_\_\_\_

**State of Minnesota**  
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**DIVISION OF ENERGY RESOURCES**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
27	Has TCM been denied ETC status in any state?  If yes, please specify the state and date denied.

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Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
Title: \_\_\_\_\_  
Department: \_\_\_\_\_  
Telephone: \_\_\_\_\_

**State of Minnesota**  
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**DIVISION OF ENERGY RESOURCES**

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*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
28	Please list all states where Total Call Mobile has been designated as an ETC, and all other states where Total Call Mobile has filed petitions for ETC status that are currently pending

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Response by: \_\_\_\_\_ List sources of information: \_\_\_\_\_  
Title: \_\_\_\_\_  
Department: \_\_\_\_\_  
Telephone: \_\_\_\_\_

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Public Comments**

**Docket No. P6892/M-12-1182**

Dated this 25<sup>th</sup> day of February 2014

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1182_12-1182
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_12-1182_12-1182
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1182_12-1182
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_12-1182_12-1182
Robert	Yap	roberty@totalcallusa.com	Total Call Mobile, Inc.	1411 W. 190th St., Suite 700  Gardena, CA 90248	Electronic Service	No	OFF_SL_12-1182_12-1182