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February 1, 2013

## **ELECTRONIC FILING**

Betty McCauley  
Director of Administration  
Public Utilities Commission of Ohio  
180 E. Broad St.  
Columbus, OH 43215-3793  
(614) 466-3016

Re: Total Call Mobile, Inc. - Case No. 12-1883-TP-UNC

Dear Ms. McCauley:

Attached please find for filing Total Call Mobile, Inc.'s Supplement to Application for Designation as a Low-Income Competitive Eligible Telecommunications Carrier.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

*/s/ Barbara Bison Jacobson*

Barbara Bison Jacobson, Esq.  
Attorney for Total Call Mobile, Inc.

Enclosures

cc: Nathaniel Law

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of the Application of Total Call Mobile, Inc. for Designation as a Low-Income Competitive Eligible Telecommunications Carrier	) ) ) ) )	Case No. 12-1883-TP-UNC
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**SUPPLEMENT TO APPLICATION OF TOTAL CALL MOBILE, INC.  
FOR DESIGNATION AS A LOW-INCOME COMPETITIVE ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

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February 1, 2013

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In the Matter of the Application of	)	Case No. 12-1883-TP-UNC
Total Call Mobile, Inc.	)	
for Designation as a Low-Income Competitive	)	
Eligible Telecommunications Carrier	)	

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**SUPPLEMENT TO APPLICATION OF TOTAL CALL MOBILE, INC.  
FOR DESIGNATION AS A LOW-INCOME COMPETITIVE ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

**I. INTRODUCTION**

Total Call Mobile, Inc. (“Total Call” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Public Utilities Commission of Ohio (“Commission”), hereby submits this Supplement to its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Ohio. Rapid grant of Total Call’s request would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Ohio residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve Total Call’s request for ETC designation.

**II. ADDITIONAL COMPANY INFORMATION**

Total Call currently offers non-Lifeline wireless services in Ohio, and will offer Lifeline wireless services upon designation as an ETC, in all areas that Sprint PCS provides service in the

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

state of Ohio. Please see attached Exhibit A for a map of Sprint PCS coverage in the state of Ohio as available on <http://coverage.sprint.com/IMPACT.jsp>. Total Call will market its non-Lifeline as well as Lifeline services under the same name, Total Call Mobile, Inc., but will keep track of its Lifeline subscribers in a separate internal database. Total Call does not have any outstanding complaints or investigations at any state commissions, the Universal Service Administrative Company (USAC), or at the FCC.

### **III. ADDITIONAL INFORMATION ON LIFELINE OFFERING**

#### **A. Proposed Lifeline Plans**

Total Call has amended its Lifeline plans to offer a discount of \$10 off per month for each retail plan, in addition to adding an additional 1000 Talk and 1000 Text plan which has a retail price of \$29.99. As such, the Lifeline customer monthly charges are as follows: 150 Minute Plan – free (Lifeline Plan 1); 250 Minute Plan – free (Lifeline Plan 2); Discounted Retail Plans - eligible customers may apply the Company’s Lifeline discount of \$10.00 (comprised of the maximum federal Lifeline subsidy, currently \$9.25<sup>3</sup>, and a Company credit) to the Company’s 1000 Talk & 1000 Text retail plan (regularly \$29.99) (Lifeline Plan 3), 30-day Unlimited Talk & Text retail plan (regularly \$39.99) (Lifeline Plan 4), or the 30-day Unlimited Talk, Text & Data retail plan (regularly \$49.99) (Lifeline Plan 5). Customers on plans 2, 3, 4 and 5 would need to purchase additional minutes in order to place international calls. See Exhibit B for an updated summary of Total Call’s proposed Lifeline rate plans.

A customer may change plans once per month at the end of the month. There is no charge to change between plans. Lifeline Plan 1 and Lifeline Plan 2 are offered exclusively to Lifeline customers. Under Total Call’s initial application, text messages were not included with Plan 1 or Plan 2. However, Total Call has since amended its plans so that Plans 1 and 2 will include text

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<sup>3</sup> See *Lifeline and Link Up Reform Order* at page 5.

messages which will be deducted from the free monthly minutes at the rate of 1 text message for each minute (i.e. one incoming or outgoing text message will consume one minute of usage). Total Call sends a free text notification to the customer when the customer's balance of airtime will be expiring. Customers may obtain free balance inquiries by calling customer service. For Lifeline customers, the information on their balance is provided in minutes of available airtime. If a Lifeline customer purchased additional minutes to add to their Lifeline-allotted airtime minutes, the balance for the additional minutes purchased is provided in dollar units. If a customer expends all of its allotted minutes on either Plan 1 or 2 and desires additional minutes or text messages before the next month's allotment of minutes, they must purchase additional usage in increments of \$5, \$10, or \$20. Any additional text messages used after the initial 150 or 250 minutes is consumed will be deducted at \$0.05 per text regardless of whether a text is read or viewed. Total Call's system allows the first 150 or 250 units each month (depending on plan selection) to be either text or minutes (i.e. one text message = one minute). Thereafter, the system is programmed such that additional minutes are \$.10 per minute and \$.05 per text and are deducted from the balance of additional usage purchased. Customers will be advised of the rates for minutes and text messages at the time they select or change their rate plan. Also, rates for minutes and text messages are clearly set forth when a customer purchases additional usage.

Customers need only call Total Call customer service to request text message blocking. There is no charge to initiate blocking of text messages, nor is there an ongoing charge to maintain text message blocking. However, customers cannot block incoming texts while retaining the ability to send texts; customers must block text messages entirely (i.e. prevent both incoming and outgoing text messages). Blocks are not available for incoming international calls. Customer may choose to block the ability for outbound international calls if they desire. Note

that on Lifeline plans other than Plan 1 (which allows customers to call certain international locations at no additional charge), international calls cannot be made unless a customer purchases additional minutes separate from the Lifeline plan minutes. Total Call does not offer free airtime for in-network calls. “Free voicemail” means that there is no additional charge for the voicemail feature being in place. However, voicemail deposits and retrievals will use airtime minutes. Customers may call customer service to deactivate voicemail.

Total Call does not charge or deduct usage from its Lifeline customers for calls to customer service. Lifeline customers are able to request English or Spanish-speaking representatives when they call customer service, and Lifeline-related customer service calls are not routed off-shore at this time.

#### **B. Payment Options**

As previously mentioned, Lifeline Plans 1 and 2 are free to the Lifeline customer. For upgrades to non-free Lifeline plans (i.e. regular retail plans at a \$10 discount), customers are automatically debited from either a credit or debit card, required to be provided by the customer. For additional top-ups, customer may purchase at retail stores in Total Call’s nationwide distribution network, through e-PIN providers at terminals nationwide, or Western Union locations nationwide. Payment via credit or debit cards are also accepted by phone at no additional charge. If a customer has upgraded to a non-free plan, a customer’s failure to reload or pay for additional usage beyond the initial purchase will cause the customer to revert to the free Lifeline Plan 1.

#### **C. Plan Enrollment**

All applications for Lifeline wireless service with Total Call require the applicant to provide proof of the individual’s (or, in the case of the National School Lunch participant, the

household member's) eligibility by submitting the appropriate documentation indicating qualification and that the individual is a member of the household.

Total Call anticipates that Total Call and its agents will perform in-person sign up through events. Launch of this program will begin upon Commission approval of Total Call as an ETC. At this time, Total Call does not have any agents or events in place in the state of Ohio. However, Total Call anticipates that it will utilize either its own employees or distributors to operate the in-person sign up events. In order to ensure protection of the customer provided documentation, all agents facilitating Lifeline enrollment must sign an agreement that contains language restricting the agent from keeping or copying any of the customer provided documentation. Further, Total Call has a destruction protocol in place after the verification of a customer's eligibility for Lifeline services is conducted and documented.

As described in section I.B.5 of the Company's Compliance Plan, at in-person events (1) Total Call representatives or agents, fully trained in Lifeline requirements, will conduct an interview, ensuring that the potential customer does not already receive a Lifeline subsidy; (2) A customer will complete the Lifeline application and provide documentation proving eligibility for Lifeline; (3) upon completion of all required eligibility verification, eligible customers will receive their phone in person. If Total Call is unable to complete the eligibility verification process at the time of application (i.e. there is no real-time eligibility database available or the customer does not have proof on hand and must submit it separately), the phone will be provided to the eligible consumer via mail or subsequent pickup upon completion of all required eligibility verification. Potential customers are not required to activate an account with Total Call prior to Lifeline approval.

Although Howard Roark Consulting remains a consultant to Total Call for Lifeline, they are no longer involved in the application review and remission process – Total Call’s internal operations team is in charge of reviewing Lifeline applications. Total Call uses software from CGM, LLC, a Georgia-based premier Lifeline service bureau, to check for internal duplicates as well as duplicates with other CGM clients who are involved in the inter-company duplicates database (“IDD”) compiled by CGM. The CGM IDD is currently the largest pooled national database. In addition to checking whether Lifeline service is already provided to a particular address, the IDD can also identify duplicate name, Social Security Number, birth date, and similar information. If an entire record is a duplicate, Total Call will reject the application. If only the address is a duplicate, the applicant will receive instructions regarding the definition of a household, and an opportunity to complete a verification that the applicant is a member of a unique household at that address that does not currently receive Lifeline benefits. Furthermore, CGM edits Total Call’s 497 each month for duplicates before submitting to USAC.

**D. Service Termination**

If service is terminated or cancelled due to any reason including non-usage, the Lifeline customer will not be charged a termination fee. Cancelled or otherwise terminated customers must re-apply to be reinstated, but there is no re-activation/reconnection fee. In regards to the Company’s non-usage policy, Total Call will discontinue a customer’s Lifeline service at the conclusion of the 60-day period of inactivity and subsequent 30-day notice period, and any remaining Lifeline minutes will not be transferred or migrated. However, customers can add regular retail airtime onto the mobile phone thereafter.

**IV. TOTAL CALL WILL COMPLY WITH COMMISSION REGULATIONS**

By this Supplement, Total Call hereby reasserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company’s

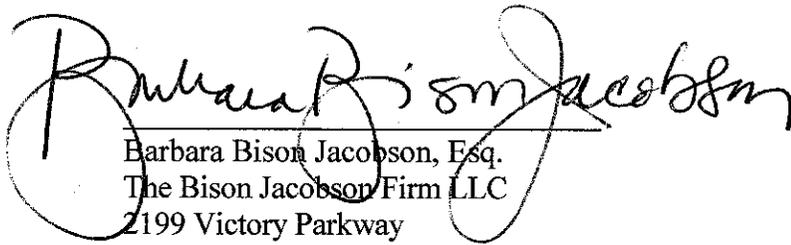
provision of service contemplated by this Application. On behalf of its wireless customers, Total Call commits to pay applicable state 911 and Telephone Relay Service (TRS) fees, as well as the Commission (PUCO) assessment fee. Total Call will remit the 911 surcharge amount for all customers based on the methodology set forth in Section 4931.61(A)(3) of the Ohio Revised Code (ORC). For TRS reporting purposes, Total Call will submit the number of access lines or equivalents it held as of December 31 of the prior year both for its non-Lifeline and Lifeline customers.

## V. CONCLUSION

Total Call submits that the information contained in the Company's Application, as supplemented herein, demonstrates that designation of Total Call as an ETC in Ohio will serve the public interest and provide a unique, much needed benefit to many eligible Ohioans.

WHEREFORE, Total Call respectfully requests that the Commission promptly designate Total Call as an ETC in the State of Ohio so that it can quickly commence providing qualifying low-income Ohio customers with affordable Lifeline-supported wireless services during these challenging economic times for all state residents.

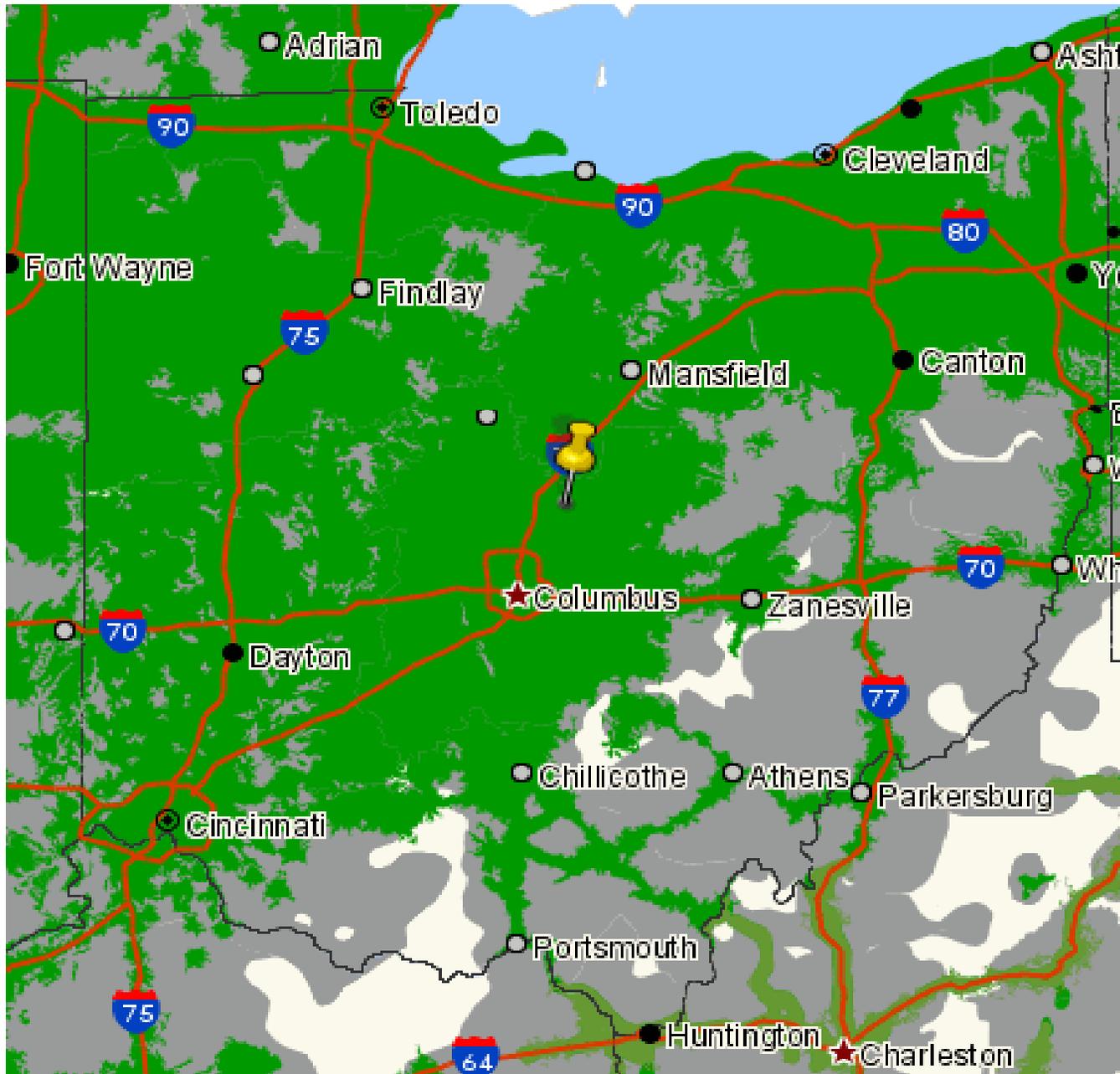
Respectfully submitted,



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**EXHIBIT A**

**Coverage Map**



Coverage

**EXHIBIT B**

**Updated Proposed Lifeline Rate Plans**

## Proposed Lifeline Offering

### Service Offering

TCM's Lifeline offering proposes to give eligible customers the following Lifeline Plan choices:

#### **Option 1: Lifeline 150 Minute Plan**

150 anytime minutes per month (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute)

(additional usage priced at 10 cents per minute and 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

\*This package includes:

- Free basic handset (customer may pay for upgrade)
- Free Voicemail, Caller-ID and Call Waiting features
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- "International Location Promo": for the Plan minutes, no additional charge for international calling to the 250 locations listed below (i.e. only the standard per minute rate applies)
- International calls to other destinations require additional funds based on call destination.

#### **Option 2: Lifeline 250 Minute Plan\***

250 anytime minutes per month (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute)

(additional usage priced at 10 cents per minute and 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

\*This package includes:

- Free basic handset (customer may pay for upgrade)
- Free Voicemail, Caller-ID and Call Waiting features
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- International calls require additional funds based on call destination. For the destinations on the 150 Minute Plan that are available at no additional charge other than airtime, customers on this Plan will be charged an additional \$0.02 per minute.

**Option 3: Lifeline Credit - Discount Plan (1000 talk & 1000 text)\***

Lifeline eligible customers may choose the 30-day 1000 talk & 1000 text plan at a \$10 discount off of retail. Additional details regarding TCM's plans can be found at [www.totalcallmobile.com/rateplans\\_monthly.aspx](http://www.totalcallmobile.com/rateplans_monthly.aspx).

1000 Talk & 1000 Text for 30 days at \$19.99 (retail price is \$29.99)

**Option 4: Lifeline Credit - Discount Plan (Unlimited Talk & Text)\***

Lifeline eligible customers may choose the 30-day Unlimited Talk & Text plan at a \$10 discount off of retail. Additional details regarding TCM's plans can be found at [www.totalcallmobile.com/rateplans\\_monthly.aspx](http://www.totalcallmobile.com/rateplans_monthly.aspx).

Unlimited Talk & Text for 30 days at \$29.99 (retail price is \$39.99)

**Option 5: Lifeline Credit - Discount Plan (30-Day Plans)\***

Lifeline eligible customers may choose the 30-day Unlimited Talk, Text & Data plan at a \$10 discount off of retail. Additional details regarding TCM's plans can be found at [www.totalcallmobile.com/rateplans\\_monthly.aspx](http://www.totalcallmobile.com/rateplans_monthly.aspx).

Unlimited Talk, Text & Data for 30 days at \$39.99 (retail price is \$49.99)

\*All Lifeline Credit – Discount Plan packages include:

- Free basic handset (customer may pay for upgrade)
- Free Voicemail, Caller-ID and Call Waiting features
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- International calls require additional funds based on call destination. For the destinations on the 150 minute plan that are available at no additional charge other than airtime, customers on these plans will be charged an additional \$0.02 per minute.

### **Free International Location Promo**

**Free International Calling Destinations on the Lifeline 150 Minute Plan** (Certain special or off-network locations may be excluded from the Free International Calling Destinations):

- Termination to landline phones only, termination to mobile phones and off network locations excluded (unless otherwise noted).
- Locations are subject to change from time to time. Please visit [www.totalcallmobile.com](http://www.totalcallmobile.com) for an updated list.
- Calls to certain cities in these countries are part of the Free International Location Promo.
- On the Free International Locations Promo, customers will still be charged for minutes but there is no additional charge for calling the specified international destinations.

Featured Countries		
Argentina	Greece	Norway
Argentina-Buenos Aires	Greece-Athens	Peru
Argentina-Cordoba	Hong Kong	Peru-Lima
Argentina-Mendoza	Hong Kong-Cellular	Poland
Argentina-Rosario	Hungary	Poland-Warsaw
Australia	Hungary-Budapest	Portugal
Australia-Melbourne	India	Singapore
Austria	India-Ahmedabad	Singapore-Cellular
Brazil	India-Bangalore	South Korea
Brazil-Belo Horizonte	India-Bombay	South Korea-Seoul
Brazil-Campinas	India-Calcutta	Spain
Brazil-Rio de Janeiro	India-Cellular	Sweden
Brazil-Sao Paolo	India-Hyderabad	Switzerland
Canada	India-Madras	Taiwan
China	India-New Delhi	Taiwan-Taipei
China-Beijing	India-Pune	Thailand
China-Cellular	India-Punjab	Thailand-Bangkok
China-Guangzhou	Ireland	Thailand-Cellular
China-Shanghai	Israel	United Kingdom
Cyprus	Italy	US Guam
Denmark	Mexico (see cities below)	US Puerto Rico
France	Netherlands	US Saipan
France-Paris	Netherlands-Amsterdam	US Virgin Islands
Germany	New Zealand	

Calls to the following cities in Mexico are part of the Free International Location Promo.

**Mexico City List**

<b>Guadalajara</b>	<b>Ciudad Acuna</b>	<b>Guamuchil</b>
<b>Ciudad de Mexico</b>	<b>Ciudad Altamirano</b>	<b>Guanajuato</b>
<b>Monterrey</b>	<b>Ciudad Camargo B</b>	<b>Guasave</b>
<b>Acaponeta</b>	<b>Ciudad Constitucion</b>	<b>Guaymas</b>
<b>Acapulco</b>	<b>Ciudad Cuauhtemoc</b>	<b>Guerrero Negro/Santa Rosa</b>
<b>Actopan</b>	<b>Ciudad del Carmen</b>	<b>Hermosillo</b>
<b>Agua Prieta</b>	<b>Ciudad Delicias</b>	<b>Heroica Ciudad de Ures</b>
<b>Agascalientes</b>	<b>Ciudad Guzman</b>	<b>Hidalgo</b>
<b>Allende</b>	<b>Ciudad Hidalgo</b>	<b>Huatabampo</b>
<b>Apatzingan</b>	<b>Ciudad Juarez</b>	<b>Huetamo</b>
<b>Apizaco</b>	<b>Ciudad Lazaro Cardenas</b>	<b>Huimanguillo</b>
<b>Arcelia</b>	<b>Ciudad Mante</b>	<b>Huitzuco</b>
<b>Atacomulco</b>	<b>Ciudad Obregon</b>	<b>Iguala</b>
<b>Atliaca/Tixtla</b>	<b>Ciudad Sahagun</b>	<b>Irapuato</b>
<b>Atlixco</b>	<b>Ciudad Valles</b>	<b>Ixtapan de la Sal</b>
<b>Autlan</b>	<b>Ciudad Victoria</b>	<b>Ixtlan del Rio</b>
<b>Bahia de Huatulco</b>	<b>Coatzacoalcos</b>	<b>Izucar de Matamoros</b>
<b>Cabo San Lucas</b>	<b>Colima</b>	<b>Jalapa</b>
<b>Caborca</b>	<b>Cordoba</b>	<b>Jalpa</b>
<b>Cadereyta Jimenez</b>	<b>Cosamaloapan</b>	<b>Jerez de Garcia Salinas</b>
<b>Campeche</b>	<b>Cozumel</b>	<b>Jojutla</b>
<b>Cananea</b>	<b>Cuautla</b>	<b>Juchitan</b>
<b>Cancun</b>	<b>Cuernavaca</b>	<b>La Barca</b>
<b>Celaya</b>	<b>Culiacan</b>	<b>La Paz</b>
<b>Cerralvo</b>	<b>Durnago</b>	<b>La Piedad</b>
<b>Cheumal</b>	<b>Encarnacion de Diaz</b>	<b>Lago de Moreno</b>
<b>Chihuahua</b>	<b>Ensenada</b>	<b>Leon</b>
<b>Chilapa</b>	<b>Estación Manuel</b>	<b>Lerdo de Tejada</b>
<b>Chilpancingo</b>	<b>Fresnillo</b>	<b>Lerma</b>
<b>Cintalapa de Figueroa</b>	<b>General Tapia</b>	<b>Linares</b>
<b>Los Mochis</b>	<b>Puerto Vallarta</b>	<b>Tenancingo</b>
<b>Los Reyes</b>	<b>Puruandiro</b>	<b>Tenango del Aire/Tlalmanalco</b>
<b>Magdalena</b>	<b>Queretaro</b>	<b>Tepatitlan</b>
<b>Manuel</b>	<b>Quimichis/Tecuala</b>	<b>Tepic</b>
<b>Manuel Ojinaga</b>	<b>Reynosa</b>	<b>Tequila</b>
<b>Manzanillo</b>	<b>Rio Grande</b>	<b>Texcoco</b>
<b>Martinez de la Torre</b>	<b>Rio Verde</b>	<b>Teziutlan</b>
<b>Matamoros</b>	<b>Sabinas</b>	<b>Ticul</b>

<b>Matehuala</b>	<b>Sahuayo</b>	<b>Tijuana</b>
<b>Mazatlan</b>	<b>Salamanca</b>	<b>Tizayuca</b>
<b>Merida</b>	<b>Saltillo</b>	<b>Tizimin</b>
<b>Mexicali</b>	<b>Salvatierra</b>	<b>Tlapa de Comonfort/Alcozauca de Gro.</b>
<b>Minatitlan</b>	<b>San Andres Tuxtla</b>	<b>Tlaxcala</b>
<b>Monclova</b>	<b>San Cristobal de las Casas</b>	<b>Toluca</b>
<b>Moelia</b>	<b>San Fernando</b>	<b>Torreon</b>
<b>Moroleon</b>	<b>San Jose de Gracia</b>	<b>Tula</b>
<b>Nacozari de Garcia</b>	<b>San Jual del Rio</b>	<b>Tulancingo</b>
<b>Navojoa</b>	<b>San Luis de La Paz</b>	<b>Tuxpan</b>
<b>Nogales</b>	<b>San Luis Potosi</b>	<b>Tuxtepec</b>
<b>Nuevo Casas Grandes</b>	<b>San Luis Rio Colorado</b>	<b>Tuxtla Gutierrez</b>
<b>Nuevo Laredo</b>	<b>San Martin Pachivia/Teloloapa</b>	<b>Uruapan</b>
<b>Oaxaca de Juarez</b>	<b>San Miguel de Allende</b>	<b>Valle de Bravo</b>
<b>Ocotlan</b>	<b>San Quintin</b>	<b>Veracruz</b>
<b>Ometepec</b>	<b>Santa Ana</b>	<b>Villa Flores</b>
<b>Orizaba</b>	<b>Santa Rosalia de Camargo</b>	<b>Villahermosa</b>
<b>Pachuca</b>	<b>Santiago Ixcuintla</b>	<b>Yurecuaro</b>
<b>Palenque</b>	<b>Santiago Papasquiario</b>	<b>Zacapu</b>
<b>Parral</b>	<b>Santiago Tianguistenco</b>	<b>Zacatecas</b>
<b>Parras de la Fuente</b>	<b>Silao</b>	<b>Zamora</b>
<b>Patzcuaro</b>	<b>Tala</b>	<b>Zihuatanejo</b>
<b>Penjamo</b>	<b>Tampico</b>	<b>Zinapecuaro</b>
<b>Petatlan</b>	<b>Tapachula</b>	<b>Zitacuaro</b>
<b>Piedras Negras</b>	<b>Taxco</b>	<b>Zumpango</b>
<b>Playas de Rosarito</b>	<b>Tecate</b>	
<b>Poza Rica de Hgo</b>	<b>Tecoman</b>	
<b>Puebla</b>	<b>Tecpan de Galeana</b>	
<b>Puerto Penasco</b>	<b>Tehuacan</b>	

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/1/2013 4:45:32 PM**

**in**

**Case No(s). 12-1883-TP-UNC**

Summary: Application Total Call Mobile, Inc.'s Supplement to Application for Designation as a Low-Income Competitive Eligible Telecommunications Carrier electronically filed by Heather Kirby on behalf of The Bison Jacobson Firm LLC, LPA