

BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Total Call Mobile, Inc., for Approval	)	Docket No. 16-2293-TP-UNC
to Relinquish its Eligible	)	
Telecommunications Carrier Designation	)	

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**AMENDED APPLICATION OF TOTAL CALL MOBILE, LLC  
FOR APPROVAL TO RELINQUISH ITS  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

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Total Call Mobile, Inc. (“Total Call”), pursuant to 47 U.S.C. § 214(e), 47 C.F.R. § 54.205, Rule 4901:1-6-09(D)(2) of the Ohio Administrative Code (“O.A.C.”), and the Public Utilities Commission of Ohio (“Commission”) Finding and Order, Case No. 12-1883-TP-UNC, dated May 15, 2013, hereby requests that the Commission approve this Amended Application (the “Application”) to Relinquish its Eligible Telecommunications Carrier (“ETC”) Designation in the State of Ohio, effective January 31, 2017. Total Call seeks to relinquish its ETC designation due to changes in the wireless industry and proposed modifications to the Lifeline program, as well as in light of the recent consent decree approved by the Federal Communications Commission (“FCC”). As detailed below, Total Call’s Lifeline subscribers will be given ample notice of the discontinuance of Total Call’s operations and there are many other ETCs able to serve Total Call’s current Lifeline subscribers.

In support of its Application for Approval to Relinquish its ETC designation, Total Call states as follows:

## Background

1. Total Call is a Delaware limited liability company. Its principal place of business is 1411 190<sup>th</sup> Street, Suite 650, Gardena, CA 90248. Total Call provides wireless Lifeline telecommunications services to consumers in Ohio through resale of Commercial Mobile Radio Services (“CMRS”) provided by Sprint PCS (“Sprint”).

2. By Order dated May 15, 2013, the Commission granted Total Call’s request for designation as a Lifeline-only ETC in Ohio.<sup>1</sup>

3. Total Call offers eligible customers in Ohio five (5) Lifeline prepaid wireless service choices.<sup>2</sup> All Total Call Lifeline service plans include a free handset, call waiting, caller identification and voicemail at no additional charge. Calls to 911 emergency services are always free, regardless of availability of minutes. Total Call does not require deposits and does not have service contracts with its Lifeline customers, and thus Lifeline customers incur no early termination fees.

4. Total Call seeks to relinquish its ETC designation and to discontinue service in Ohio due to changes in the wireless industry and proposed modifications to the Lifeline program. Total Call also intends to exit its wireless Lifeline business in every state and U.S territory in which it currently offers wireless Lifeline service. Additionally, Total Call has entered into a consent decree, approved by the FCC on December 22, 2016, that requires it to cease Lifeline

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<sup>1</sup>*In the Matter of the Petition of Total Call Mobile, Inc., for Designation as a Low-Income Competitive Eligible Telecommunications Carrier*, Case No. 12-1883-TP-UNC, Finding and Order (May 15, 2013) (“Order”).

<sup>2</sup>Lifeline Plan 1 offers 250 free anytime minutes with an option of using text, inbound or outbound, which consumes one (1) Plan minute per text. Lifeline Plan 2 offers a 1000 Minute Talk & 1000 Text retail plan for \$19.99 (after application of the \$10.00 Lifeline discount to the regular retail price \$29.99). Lifeline Plan 3 offers a 30-day Unlimited Talk retail plan for \$19.99 (after application of the \$10.00 Lifeline discount to the regular retail price \$29.99). Lifeline Plan 4 offers a 30-day Unlimited Talk & Text retail plan for \$29.99 (after application of the \$10.00 Lifeline discount to the regular retail price \$39.99). Lifeline Plan 5 offers a 30-day Unlimited Talk, Text, & Data retail plan for \$39.99 (after application of the \$10.00 Lifeline discount to the regular retail price \$49.99).

operations.<sup>3</sup> While this consent decree calls for a December 31, 2016 cessation date, Total Call can nonetheless continue to serve the remaining customers through the January 31, 2017 proposed relinquishment date as part of the orderly shut-down of operations.

5. Total Call is not currently enrolling any new Lifeline subscribers in Ohio, and has not enrolled any new customers since April 28, 2016. Total Call ceased advertising and marketing to new customers in Ohio on or about that same date.

6. Total Call is not currently receiving, has not received since May 2016, and will not seek to receive reimbursement for the Lifeline discount upon relinquishment.

7. Of Total Call's total subscriber base, 1,687 Lifeline subscribers have been transferred to Boomerang Wireless dba enTouch Wireless ("Boomerang"). With the transfer, the transferred subscribers were able to retain their handsets as they are compatible with Boomerang's network, subscribers were able to retain the same phone number, subscribers would be served by the same nationwide wireless network provided by Sprint, and the transferred subscribers received an upgrade in service, including an additional 500 voice units, 100 texts, and 10 mb of data on Boomerang's network. All subscribers that were compatible with Boomerang's network were transferred.

8. On November 1, 2016, Total Call sent a customer notification via electronic means (text message) to its wireless Lifeline subscribers in Ohio who Total Call intended to transfer to Boomerang.<sup>4</sup> The transfer of subscribers to Boomerang was facilitated pursuant to a transfer agreement. As customers would continue to be served by the same national wireless network, would see an upgrade in their service without needing to obtain a new phone number or handset, and received notice prior to the transfer, affirmative subscriber

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<sup>3</sup>*In the Matter of Total Call Mobile, Inc.*, File No.: EB-IHD-14-00017650, Order (December 22, 2016).

<sup>4</sup> See Attachment A.

consent was not sought prior to transfer to Boomerang. The Commission was notified of such transfer and agreement by Total Call and Boomerang by a letter dated October 13, 2016, which was filed on October 14, 2016 in Case No. 15-1065-TP-UNC.

### **Federal and State ETC Relinquishment Requirements**

1. 47 U.S.C. § 214(e)(4) states, in pertinent part:

A State commission...shall permit an eligible telecommunications carrier relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State Commission...of the relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State Commission...shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier.

See also 47 C.F.R. § 54.205. As shown below, Total Call satisfies all relevant requirements of these provisions.

2. Rule 4901:1-6-09(D)(2), O.A.C., states, in pertinent part:

An ETC may seek to relinquish its ETC designation for an area pursuant to 47 C.F.R. 54.205 through the filing of a nonautomatic application with the commission under the case purpose code TP-UNC. An ETC will not be relieved of its ETC designation until the commission issues an order granting the request.

As shown below, Total Call also satisfies all relevant requirements of this rule.

### **Designated Service Area**

1. Total Call seeks to withdraw its ETC designation throughout its entire designated service area in Ohio.
2. As set forth in 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, federal law requires

the Commission to permit the withdrawal of an ETC designation in any area served by at least one other ETC.

3. Total Call provides wireless Lifeline service to customers in approximately thirty (30) wire centers across Ohio. Each of these wire centers is served by an incumbent local exchange carrier (“ILEC”) that is designated as an ETC. See Order at 2, ¶ 6.

4. As a consequence, following relinquishment of Total Call’s ETC designation, Total Call’s service area will continue to be served by at least one ILEC ETC.<sup>5</sup> In addition, according to Universal Service Administrative Company (“USAC”) records, Total Call’s Lifeline subscribers will have access to at least eleven other competitive wireless Lifeline providers that provide service in at least part of Total Call’s designated service area – including Access Wireless, Assurance Wireless, and Safelink Wireless.<sup>6</sup>

5. Since at least one ILEC ETC already serves each of the wire centers that Total Call serves, those ETCs will not be required to purchase or construct additional facilities to ensure that Total Call’s Lifeline subscribers continue to receive service. In addition, to the best of Total Call’s knowledge, none of the competitive wireless Lifeline providers will be required to purchase or construct additional facilities to continue providing service within the wire centers comprising Total Call’s service area.

6. Because there is at least one additional ETC in each of Total Call’s designated service areas, there is no bar to prevent it from relinquishing its ETC designation in Ohio, and 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205 have been met.

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<sup>5</sup> See Attachment B.

<sup>6</sup> See Attachment C; also see <http://www.lifelinesupport.org/ls/companies/companies.aspx>.

## Customer Notice

1. Total Call currently has a total of 170 wireless Lifeline subscribers in Ohio.
2. On November 29, 2016, Total Call sent a customer notification via electronic means (text message) to its wireless Lifeline subscribers in Ohio who still have not transferred. This notice told each subscriber that Total Call planned to relinquish its ETC designation in Ohio on December 31, 2016. The notice also informed each subscriber that, upon relinquishment of Total Call's ETC designation, a Lifeline discount could be obtained from an ILEC ETC or other competitive wireless Lifeline providers in Total Call's service area.<sup>7</sup>
3. On or about January 4, 2017, Total Call sent a second customer notification via electronic means (text message) to its wireless Lifeline subscribers in Ohio who still need to transfer. This notice told each subscriber that Total Call now plans to relinquish its ETC designation in Ohio on January 31, 2017. The notice also informed each subscriber that, upon relinquishment of Total Call's ETC designation, a Lifeline discount could be obtained from an ILEC ETC or other competitive wireless Lifeline providers in Total Call's service area.<sup>8</sup>
4. The text message notices underscore in plain language that the subscriber must make arrangements with another carrier to avoid loss of service and provides a toll-free number that the customer may call to reach Total Call's customer service representatives for assistance with this transition. The notices also provided the names of three well-established wireless Lifeline service providers or directed the subscriber to a full list of alternative providers in their area.
5. Upon Commission approval of this Application, Total Call will also provide a written notification letter by U.S. Mail to remaining wireless Lifeline subscribers in Ohio who

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<sup>7</sup> See Attachment D.

<sup>8</sup> See Attachment E.

have not transferred service.<sup>9</sup> This letter will notify each subscriber that Total Call is in the process of relinquishing its ETC designation in Ohio, effective January 31, 2017, subject to regulatory approval and that it filed an application with the Commission seeking approval of that relinquishment. The letter will also inform each subscriber how to obtain Lifeline benefits from an ILEC ETC or other competitive wireless Lifeline providers in Total Call's service area.

6. Total Call does not require deposits, so there is no need for a plan for return of customer deposits.

7. Total Call will continue to provide weekly updates to the Staff of the Commission regarding the number of remaining subscribers, and will file a letter in the docket prior to the approved relinquishment date noting the number of remaining subscribers.

8. On the Commission-approved relinquishment date, Total Call will promptly de-enroll any remaining subscribers in the National Lifeline Accountability Database and release the phone numbers of those customers who are no longer served by Total Call as of that date.

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<sup>9</sup> See Attachment F.

**Conclusion**

For the foregoing reasons, Total Call respectfully requests that the Commission approve Total Call's Application to relinquish its ETC designation in the State of Ohio, effective January 31, 2017.

Respectfully submitted,



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*Counsel for Total Call Mobile, Inc.*

Dated: January 5, 2016

**November 1, 2016 Total Call Mobile  
Customer Text Message Notification**

ALERT. On 11/28 your Lifeline wireless service provided by Total Call Mobile (TCM) will be provided by Boomerang Wireless dba enTouch Wireless. Your service will be upgraded to 500 voice units 100 texts and 10 mb. You will not need to change phones. You will keep the same phone number. You will be on the same national wireless network. For more information call 611 from your Total Call Lifeline phone or 800-661-7391.

**ILEC ETCs**

Glandorf Telephone Co., Inc.  
Cincinnati Bell Telephone  
American Broadband and Telecommunications  
AT&T  
Ayersville Telephone Company  
Benton Ridge Telephone Company  
CenturyLink  
Conneaut Telephone Company  
Doylestown Telephone Company  
Fairpoint Communications  
Farmers Mutual Telephone Company  
Fort Jennings Telephone Company  
Frontier Communications  
Kalida Telephone Co., Inc.  
McClure Telephone Co.  
Minford Telephone Company / Falcon1.net  
Ottoville Mutual Telephone Co.  
Sherwood Mutual Telephone Association  
Sycamore Telephone Company  
TDS Telecom/Arcadia Telephone Company  
TDS Telecom/Continental Telephone Company  
TDS Telecom/Little Miami Communications Corporation  
TDS Telecom/Oakwood Telephone Company  
TDS Telecom/The Vanlue Telephone Company  
Telephone Service Company  
The Arthur Telephone Company  
The Champaign Telephone Company  
The Chillicothe Telephone Company  
The Middle Point Home Telephone Company  
The Nova Telephone Company  
Wabash Mutual Telephone Company  
Windstream Communications

Competitive Wireless ETCs

Air Voice Wireless  
American Broadband & Telecommunications  
Assurance Wireless  
Boomerang Wireless LLC  
Budget Mobile  
Q Link Wireless  
Safelink Wireless  
Sage Telecom Communications, LLC  
Stand Up Wireless  
Tempo Telecom  
Telrite Corporation dba Life Wireless

**November 29, 2016 Total Call Mobile  
Customer Text Message Notification**

Total Call Mobile will stop providing your service on December 31, 2016. Please contact another Lifeline provider such as Access Wireless, Assurance Wireless, and Safelink Wireless if you still want Lifeline service after December 31, 2016. Questions? Call 1-800-550-5265.

**January 4, 2017 Total Call Mobile  
Customer Text Message Notification**

Total Call Mobile will stop providing your service on January 31, 2017. Please contact an alternative Lifeline provider if you still want Lifeline service after January 31, 2017. A list of alternative providers near you is available at <http://www.lifelinesupport.org/ls/companies/companies.aspx>. Questions? Call 1-800-550-5265.

[DATE]

Total Call Mobile, LLC  
1411 190<sup>th</sup> St., Suite 659  
Gardena, CA 90238

[SUBSCRIBER NAME]  
[SUBSCRIBER ADDRESS]

Dear Total Call Subscriber:

Subject to regulatory approval, you are hereby notified that on January 31, 2017, your cell phone service, currently provided by Total Call Mobile, LLC (“Total Call”), will be disconnected. Total Call has filed an application with the Public Utilities Commission of Ohio (“Commission”) seeking approval to discontinue the provision of Lifeline services in Ohio.

If you wish to continue receiving Lifeline discounted service, you must select an alternative provider in your area for your telephone service immediately as your Total Call service will be disconnected on January 31, 2017.

Lifeline assistance is available from your traditional landline service provider and various wireless providers. A listing of Lifeline service providers is available by visiting <http://www.lifelinesupport.org/ls/companies/companies.aspx> and selecting your state on the map. A list of Lifeline-supported service providers in your state are also attached to this letter. You will need to contact an alternative provider to set up a new account, verify your Lifeline benefit eligibility, and transfer your existing phone number. The other providers may have different rates, terms and conditions, equipment, and service packages from what you currently are receiving from Total Call. If you are unable to find alternate service by January 31, 2017, you will lose your service and possibly your phone number.

Please do not hesitate to contact Total Call Customer Service at 1-800-550-5265 or via our website at [www.totalcallmobile.com/Lifeline](http://www.totalcallmobile.com/Lifeline) if you have any questions. You may also reach the Commission toll-free at 1-800-686-PUCO (7826) or 7-1-1 (TTY-TDD).

Hideki Kato  
Chief Operating Officer  
Total Call Mobile, Inc.

## Lifeline Service Providers

Name	Phone	Service Type
Air Voice Wireless	888-944-2355	Wireless
American Broadband & Telecommunications	866-966-2628	Wireless
Assurance Wireless	888-898-4888	Wireless
Boomerang Wireless LLC	866-488-8719	Wireless
Budget Mobile	888-777-4007	Wireless
Q Link Wireless	855-754-6543	Wireless
Safelink Wireless	800-723-3546	Wireless
Sage Telecom Communications, LLC	888-449-4940	Wireless
Stand Up Wireless	800-544-4441	Wireless
Tempo Telecom	877-822-8501	Wireless
Telrite Corporation dba Life Wireless	888-543-3620	Wireless
Glandorf Telephone Co., Inc.	419-538-6987	Home Phone
Cincinnati Bell Telephone	888-246-2355	Home Phone
American Broadband and Telecommunications	866-966-2628	Home Phone
AT&T	800-288-2020	Home Phone
Ayersville Telephone Company	419-395-2222	Home Phone
Benton Ridge Telephone Company	419-859-2144	Home Phone
CenturyLink	800-407-5411	Home Phone
Conneaut Telephone Company	440-593-7140	Home Phone
Doylestown Telephone Company	330-658-2121	Home Phone

Fairpoint Communications	866-984-2001	Home Phone
Farmers Mutual Telephone Company	419-758-3322	Home Phone
Fort Jennings Telephone Company	419-286-2181	Home Phone
Frontier Communications	800-921-8101	Home Phone
Kalida Telephone Co.,Inc.	419-532-3218	Home Phone
McClure Telephone Co.	419-748-8008	Home Phone
Minford Telephone Company / Falcon1.net	740-820-2151	Home Phone
Ottoville Mutual Telephone Co.	419-453-3324	Home Phone
Sherwood Mutual Telephone Association	419-899-2121	Home Phone
Sycamore Telephone Company	419-927-6012	Home Phone
TDS Telecom/Arcadia Telephone Company	888-225-5837	Home Phone
TDS Telecom/Continental Telephone Company	888-225-5837	Home Phone
TDS Telecom/Little Miami Communications Corporation	888-225-5837	Home Phone
TDS Telecom/Oakwood Telephone Company	888-225-5837	Home Phone
TDS Telecom/The Vanlue Telephone Company	888-225-5837	Home Phone
Telephone Service Company	419-739-2200	Home Phone
The Arthur Telephone Company	419-393-2233	Home Phone
The Champaign Telephone Company	217-344-4444	Home Phone
The Chillicothe Telephone Company	740-772-8331	Home Phone
The Middle Point Home Telephone Company	419-968-2000	Home Phone
The Nova Telephone Company	419-652-3577	Home Phone
Wabash Mutual Telephone Company	800-988-1618	Home Phone
Windstream Communications	800-347-1991	Home Phone

Ridgeville Telephone Company

419-267-5185

Home Phone

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

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**Case No(s). 16-2293-TP-UNC**

Summary: Application Amended Application Of Total Call Mobile, LLC For Approval To Relinquish Its Eligible Telecommunications Carrier Designation electronically filed by Mrs. Kimberly W. Bojko on behalf of Total Call Mobile, LLC