



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: February 4, 2025

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Samuel Day, Public Utility Analyst III, Office of Industry Development & Market Analysis *SD*

RE: Docket No. 20240147-TP – Petition to expand eligible telecommunications service area to statewide, by Assurance Wireless USA, L.P.

Attached is the company's response to Staff questions. Please add to docket file.

If you have any questions, please contact Samuel Day at (850) 413-6734.

RECEIVED-FPSC
2025 FEB -4 AM 8:31
COMMISSION
CLERK

Samuel Day

From: Floyd R. Self <fself@bergersingerman.com>
Sent: Monday, February 3, 2025 1:39 AM
To: Samuel Day
Cc: 'Michelle.Lama@t-mobile.com'; Greg Fogleman
Subject: RE: Meeting Questions - FPSC Docket 20240147-TP

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Sam, sorry for the delay. Here are the answers to the various questions:

- FCC Order DA 20-1295 appears to mandate that Assurance develop and implement a compliance plan, and also mandated for Assurance to file compliance reports to the FCC for a few years. Can the documents that have been sent to the FCC in response to the Order in DA 20-1295 be provided to the Florida Commission? **The Consent Decree has ended, all compliance reports were filed confidentially, and there is no current reporting to the FCC.**
- Has Assurance ever been subject to ETC revocation proceedings? **No.**
- After our explanation of the Lifeline Promotion Process, does Assurance now plan to participate this process (Florida administrative code 25-4.0665(3))? **Yes, Assurance will participate in this process and will work with the Florida Commission as needed.**
- Assurance is seeking expanded ETC designation in the WPBHFLGR, MICCFLBB, and KSSMFLXC wire centers (FPSC Docket Number 20240147-TP, Exhibit A of DN 09645-2024). Since Assurance has recently acquired Q-LINK's Lifeline customers (pursuant to FCC DA 24-1182), are there any Lifeline customers that are within these wire centers? If yes, please indicate by wire center how many customers were: from Q-LINK or existing Assurance customers. **A total of 9 Q-Link customers: 6 in KSSMFLXC and 3 in WPBHFLGR**
- Are affected customers in these wire centers currently receiving discounted services? If yes, is Assurance forgoing Lifeline reimbursements for Lifeline customers in these three wire centers from USAC? **Yes, affected customers are receiving discounted services and yes, Assurance is forgoing reimbursement.**

With respect to the Lifeline Promotion Process, what needs to happen next? Does someone at Assurance/T-Mobile need to contact you or do you reach out to a designated person???

Please let me know if you need anything else.

Thanks,
Floyd

[External E-mail]

Let's do 11:00 on Monday.

Topics:

- 1) Discussion of Promotional Lifeline Process.
- 2) Question regarding QLink Customers transitioned to Assurance and if there are any affected Lifeline customers are in the three wire centers Assurance has requested expanded ETC status in Florida. (see [DA 24-1182](#))

From: Floyd R. Self <fself@bergersingerman.com>
Sent: Friday, January 3, 2025 10:54 AM
To: Greg Fogleman <GFoglema@PSC.STATE.FL.US>
Subject: Call Monday

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Greg, I am available any time after 10:30 AM on Monday.

Just send me a calendar invite for whatever time works best with you. And if you have specific questions, feel free to send those to me in advance.

Thanks,
Floyd

 **Floyd R Self**
 Board Certified State and Federal Government and Administrative Practice Lawyer
 **Berger Singerman** *Florida's Business Law Firm*
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Samuel Day

From: Floyd R. Self <fself@bergersingerman.com>
Sent: Monday, December 23, 2024 3:17 PM
To: Samuel Day
Cc: Greg Fogleman; Jennifer Augspurger
Subject: RE: FPSC Docket 20240147 Follow-Up Questions

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Sam,

I've been advised there is no wholesale agreement.

Please let me know if you need anything else.

Have a great holiday!

Floyd



From: Samuel Day <SDay@psc.state.fl.us>
Sent: Tuesday, December 10, 2024 5:27 PM
To: Floyd R. Self <fself@bergersingerman.com>
Subject: RE: FPSC Docket 20240147 Follow-Up Questions

[External E-mail]

Hey Floyd,

Back in 2009 when Virgin Mobile was owned by Sprint and was applying to be an ETC, the company stated that it had a wholesale arrangement with Sprint. Nowadays, does Assurance have a wholesale arrangement with its parent company T-Mobile?

Thanks,

Sam Day

Public Utility Analyst III



Office of Industry Development
& Market Analysis | (850) 413-6734

From: Floyd R. Self <fself@bergersingerman.com>
Sent: Tuesday, November 26, 2024 12:42 PM
To: Samuel Day <SDay@psc.state.fl.us>

Samuel Day

From: Floyd R. Self <fself@bergersingerman.com>
Sent: Friday, December 13, 2024 1:05 PM
To: Samuel Day
Cc: Greg Fogleman; Jennifer Augspurger
Subject: RE: FPSC Docket 20240147 Follow-Up Questions

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Sam, apologies for taking so long to respond to this.

Please see the following responses:

- 1) Per 47 CFR § 54.202(a)(2), is Assurance able to remain functional in emergency situations? **Yes.**
- 2) Will Assurance continue to offer Transitional Lifeline Service throughout its lifespan as an ETC? **Assurance currently gives customers an opportunity to transition from Lifeline to another service pursuant to the terms and conditions on our website, and does not have current plans to remove this transitional offering.**
- 3) In Assurance's 2024 Data Request, Assurance responded that they do not participate in the Lifeline Promotion Program Process. The Lifeline Promotion Process is an electronic interface between the Department of Children and Families, the Commission, and the eligible telecommunications carrier to provide eligible consumers information on how to apply for Lifeline assistance following enrollment in a qualifying public assistance program.

To the extent the Lifeline Promotion Program Process is a way to pre-qualify applicants for Lifeline Service, Assurance does not participate as customers must qualify through the National Verifier. If it is solely a Marketing/ Promotional tool, Assurance is open to hearing more about the Program.

Please let me know if you need anything else.

Thanks,
Floyd

 **Floyd R Self**
D: (850)521-6727 | M: (850)566-6347
bergersingerman.com

From: Samuel Day <SDay@psc.state.fl.us>
Sent: Wednesday, November 13, 2024 5:08 PM
To: Floyd R. Self <fself@bergersingerman.com>