

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, DC 20007

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

JOHN J. HEITMANN

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

NEW YORK, NY
LOS ANGELES, CA
HOUSTON, TX
AUSTIN, TX
CHICAGO, IL
PARSIPPANY, NJ
STAMFORD, CT
BRUSSELS, BELGIUM

AFFILIATE OFFICE
MUMBAI, INDIA

March 27, 2018

By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Boomerang Wireless, LLC d/b/a enTouch Wireless Notice of Oral Ex Parte Presentation; WC Docket Nos. 17-287, 11-42, 09-197**

Dear Ms. Dortch:

On March 23, 2018, Dennis Henderson and Kim Lehrman of Boomerang Wireless, LLC d/b/a enTouch Wireless and John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP met with Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety, to Commissioner Jessica Rosenworcel to discuss the recent and proposed changes to the Lifeline program in the above-referenced proceedings.¹ The discussion was consistent with the enclosed presentation and the comments and reply comments filed by the National Lifeline Association on February 21, 2018 and March 23, 2018.²

¹ See *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (rel. Dec. 1, 2017).

² See Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Mar. 23, 2018).

KELLEY DRYE & WARREN LLP

Marlene Dortch
March 27, 2018
Page Two

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



John J. Heitmann
Joshua Guyan
Kelley Drye & Warren LLP
3050 K Street, NW, Suite 400
Washington, DC 20007
(202) 342-8400

*Counsel to Boomerang Wireless, LLC d/b/a
enTouch Wireless*

Enclosure

cc: Travis Litman

FINDING A PATH FORWARD

FUTURE OF LIFELINE

Dennis Henderson, CEO & Co-Founder
Dennis@Readywireless.com

Kim Lehrman, President
klehrman@readywireless.com

OUR COMPANY HAS INVESTED HEAVILY TO BUILD A ROBUST WIRELESS SERVICE OFFERING

"THE PROPOSED EXCLUSION OF RESELLERS FROM THE LIFELINE PROGRAM WOULD BE HIGHLY DISRUPTIVE TO EXISTING LIFELINE BENEFICIARIES AND IS AT ODDS WITH THE COMMISSION'S GOAL OF SUPPORTING AFFORDABLE VOICE TELEPHONY AND HIGH-SPEED BROADBAND FOR LOW-INCOME HOUSEHOLDS." VERIZON NPRM COMMENTS

BOOMERANG IS HIGHLY ALIGNED IN SUPPORTING RURAL AND TRIBAL BROADBAND INITIATIVES

CURRENTLY SERVING 50 TRIBES IN 15 STATES ON 3G/4G DATA AND VOICE PLANS; WITHOUT US SOME TRIBAL SUBSCRIBERS WILL HAVE NO LIFELINE SERVICE OPTIONS

34 STATES AND TERRITORIES HAVE GRANTED US ETC STATUS SINCE 2012, INCLUDING RURAL STATES LIKE IA, ID, MS, NE, NC, SD, UT, WY

THE FCC SHOULD RESPECT STATES' AND TRIBES' ROLE IN GRANTING ETC DESIGNATIONS/AUTHORITY

OUR USAC AUDIT RECORD DEMONSTRATES WE ARE GOOD STEWARDS OF THE FUND

OUR COMPANY IS BEING TARGETED FOR EXCLUSION FROM LIFELINE WHEN WE HAVE DONE NOTHING WRONG

THE NATIONAL VERIFIER AND TARGETED AUDITING WILL ADDRESS ANY OUTSTANDING WASTE, FRAUD, AND ABUSE ISSUES

WE OFFER ROBUST AND AFFORDABLE OPTIONS TO HELP CONSUMERS CLOSE THE DIGITAL DIVIDE

BOOMERANG CONDUCTED PRIMARY RESEARCH ON OUR TARGETED LIFELINE CONSUMERS & DEVELOPED POSITIONING THAT IS ALIGNED WITH POLICY THAT FAVORS COMPETITION AND REAL CONSUMER CHOICE

LET US CONTINUE TO PROVIDE HIGH QUALITY INNOVATIVE PRODUCTS THAT SPECIFICALLY ADDRESS THE AFFORDABILITY ASPECT OF THE DIGITAL DIVIDE



\$20

You Could
SAVE
\$10 /mo.

PLAN INCLUDES
Unlimited Talk & Text **
1/2 GIG of 4G Data
Unlimited Always On Data[†]



\$30

You Could
SAVE
\$10 /mo.

PLAN INCLUDES
Unlimited Talk & Text **
1 GIG of 4G Data
Unlimited Always On Data[†]



\$50

You Could
SAVE
\$10 /mo.

PLAN INCLUDES
Unlimited Talk & Text **
4 GIG of 4G Data
Unlimited Always On Data[†]