

December 22, 2014

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible to Receive Universal Service Support; Boomerang Wireless, LLC; Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket No. 09-197*

Dear Ms. Dortch:

On December 18, 2014, Scott Blake Harris, Brita Strandberg and the undersigned of this firm met with Rebekah Goodheart, Legal Advisor of Wireline to Commissioner Clyburn, on behalf of Boomerang Wireless, LLC (“Boomerang”). During the meeting we discussed Boomerang’s above-captioned request that it be designated as an Eligible Telecommunications Carrier to provide Lifeline service.

We explained that in the states where it is already approved, Boomerang is a careful Lifeline provider that understands its responsibility to protect public funds. It likewise understands its responsibility to the communities it serves, and has long recognized that offering these communities voice service alone is not enough to close the gap between the communications haves and have-nots. Boomerang has therefore been working aggressively to close that gap.

First, and most importantly, Boomerang’s Lifeline plan includes wireless data. Boomerang was among the first to provide data-enabled handsets to its customers, including basic smartphones. During distribution, the company teaches users how to access the Internet. Customers can add additional data to their plan for as little as \$5 per month.

One significant benefit of Boomerang’s approach is that consumers can use email to communicate with health care providers. Boomerang discussed its efforts to partner with health care providers so that at-risk communities can have the communications they need to support effective health care.

Finally, we noted that granting Boomerang’s ETC application will serve the public interest and expand broadband access by enabling Boomerang to offer its Lifeline service, including data, in all of the above-captioned states.

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If you have any questions, please do not hesitate to contact me at (202) 730-1347, or
snorvell@hwglaw.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susannah J. Norvell". The signature is written in a cursive, flowing style.

Susannah J. Norvell
Counsel to Boomerang Wireless, LLC

cc: Rebekah Goodheart