

January 12, 2015

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's 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 January 8, 2015, Scott Blake Harris, Brita Strandberg and the undersigned of this firm met with Amy Bender, Legal Advisor to Commissioner O’Rielly, on behalf of Boomerang Wireless, LLC (“Boomerang”). We also met separately with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel. During the meetings 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.

In response to questions Ms. Goodheart asked in our December 2014 meeting, Boomerang also submits the following information in support of its above-captioned request:

Total subscribers - As of December 2014, Boomerang had 52,589 total subscribers.

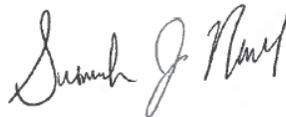
State applications pending - Boomerang currently has applications pending in 18 states, 7 of which are state applications in Massachusetts, Mississippi, New Jersey, New Mexico, Oregon, Pennsylvania, and South Dakota. Those applications have been pending for different amounts of time, ranging from the first filed in April 2012 to as recently as May 2014.

State approval for tribal lands - Of the 22 states where Boomerang is an approved Lifeline provider, Boomerang is approved for distribution to tribal lands in 9 of those states: Arizona, Iowa, Kansas, Michigan Minnesota, North Dakota, Oklahoma, Washington, and Wisconsin. Boomerang is also currently seeking approval for tribal lands in California, Colorado, South Dakota, and New Mexico.

California Lifeline Plans - Boomerang's ETC certification has been approved in California. With the additional state funding, Boomerang offers a free plan with data which includes 1100 units and 100 megabits of data. Lifeline customers can also choose a \$20/month plan with unlimited units and 100 megabits of data, or a \$30 plan with unlimited units and unlimited data. As with all of Boomerang's Lifeline plans, 1 unit equates to 1 minute or 1 text.

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

Respectfully submitted,



Susannah J. Norvell
Counsel to Boomerang Wireless, LLC

cc: Amy Bender
Priscilla Argeris
Rebekah Goodheart