

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of )  
 )  
Request for Review by TAG Mobile, LLC Of )  
Decision of the Universal Service ) Audit No. LI2013BE012  
Administrator )

**MOTION OF TAG MOBILE, LLC FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission’s Rules, 47 C.F.R. § 1.46, TAG Mobile, LLC<sup>1</sup> (TAG Mobile or the Company) respectfully requests that the Federal Communications Commission (the Commission) grant a brief extension of time for TAG Mobile to file its appeal with the Wireline Competition Bureau (Bureau), regarding the Universal Service Administrative Company’s (USAC or Administrator) July 24, 2015 Decision on the Lifeline Program Beneficiary Appeal.<sup>2</sup> Section 54.720 of the Commission’s rules requires TAG Mobile to file an appeal within 60 days after the date of the Administrator’s decision, which makes TAG Mobile’s appeal due by September 22, 2015. For the reasons stated herein, TAG Mobile seeks an additional 30 days to file its appeal with the Bureau, which would extend the deadline to October 22, 2015.

TAG Mobile makes this request because the findings in the Administrator’s Decision raise new issues and require TAG Mobile to attempt to obtain new forms of documentation to

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<sup>1</sup> TAG Mobile, LLC is an eligible telecommunications carrier that provides wireline Lifeline service in several states.

<sup>2</sup> See Administrator’s Decision on Lifeline Program Beneficiary Appeal, USAC Audit No. LI2013BE012 (July 24, 2015) (Administrator’s Decision).

refute those findings.<sup>3</sup> In May 2014, TAG Mobile received the results of an audit conducted on November 7, 2013, by the Internal Audit Division (IAD) of USAC.<sup>4</sup> The audit examined TAG Mobile's provision of wireless Lifeline service to its Maryland subscribers during January 2013. Upon receiving IAD's audit results, the Company timely filed a Request for Review, on July 15, 2014 with USAC.<sup>5</sup>

Throughout the course of the audit, and in the Company's Request for Review, TAG Mobile provided USAC with multiple forms of detailed documentation, including screenshots of customer invoices, invoicing documentation from its internal billing system and customer usage records to demonstrate that the required minutes had been passed through to TAG Mobile's subscribers in Maryland in January 2013.<sup>6</sup>

The Administrator's Decision unreasonably discounts the documentation TAG Mobile has already provided and requests additional documentation from TAG Mobile's underlying carriers.<sup>7</sup> Over the course of the audit period, this information has proven time-consuming to seek and difficult, if not impossible, to obtain. The information USAC identifies as being necessary to refute USAC's audit findings, if available, resides in the systems maintained by TAG Mobile's intermediary or underlying carriers, which TAG Mobile neither has access to nor controls. The current appeal deadline does not give TAG Mobile sufficient time to attempt to

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<sup>3</sup> See Administrator's Decision on Lifeline Program Beneficiary Appeal, USAC Audit No. LI2013BE012 (July 24, 2015) ("Administrator's Decision").

<sup>4</sup> See Independent Auditor's Report on TAG Mobile, LLC's Compliance with Low Income Support Mechanism Rules, USAC Audit No. LI2013BE012 (Nov. 7, 2013).

<sup>5</sup> See Results of the 2013 Audit of TAG Mobile, LLC (SAC 189020), USAC Audit No. LI2013BE012 (May 15, 2014); see also Request for Review by TAG Mobile, LLC of Decision of the Universal Service Administrator, USAC Audit No. LI2013BE012, Request for Review (July 15, 2014) ("Request for Review").

<sup>6</sup> See Request for Review.

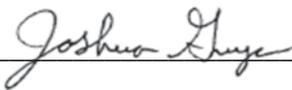
<sup>7</sup> See Administrator's Decision at 3-4.

seek and obtain additional documentation regarding customer usage of minutes from its intermediary or underlying carriers, to provide to the Commission.

In addition, many of TAG Mobile's employees who were with the Company in January 2013 and during the time of the USAC audit and Request for Review in 2013 and 2014, and were familiar with the audit, are no longer with the Company, which makes the process more difficult and time-consuming.<sup>8</sup>

TAG Mobile respectfully requests that the time for submission of its appeal to the Commission be extended until October 22, 2015.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Joshua T. Guyan", is written over a horizontal line.

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September 18, 2015

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<sup>8</sup> See Federal-State Joint Board on Universal Service, Kingsgate Telephone, Inc. Petition for Waiver of the Definition of "Study Area" in the Appendix – Glossary of Part 36, CC Docket No. 96-45, Order, 29 FCC Rcd. 8330 (July 15, 2014) (finding an extension of time was warranted in part because the employees who originally addressed the issue were no longer with the company and the records required may be several years old and not readily available).