



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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COMMISSIONER

November 10, 2011

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

Ex Parte Notice

***In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link Up,
WC Docket No. 03-109.***

Dear Ms. Dortch:

On Tuesday, November 8, 2011, Carol Matthey, Deputy Chief of the Wireline Competition Bureau, and Angela Kronenberg, Wireline Legal Advisor to Commissioner Mignon Clyburn, spoke with Massachusetts Department of Telecommunications and Cable (MDTC) Counsel, Kerri DeYoung, at the Massachusetts Broadband Conference in Boston, Massachusetts.

Ms. DeYoung discussed issues raised in the above proceedings, noting certain trends that various state commissions, including the MDTC, have observed in recent eligible telecommunications carrier (ETC) designation applications for federal low-income support. Ms. DeYoung reported that in Massachusetts and elsewhere, many entities seeking limited ETC designation include wireless carriers intending to provide service to eligible low-income consumers using a combination of their own facilities and resold service. In addition, Ms. DeYoung reported observing the following trends without taking a particular position on any of these issues:

- (1) petitions in which the applicant identifies resold and leased and/or owned facilities located out-of-state to satisfy the federal statutory facilities requirement;
- (2) petitions claiming satisfaction of the facilities requirement solely by facilities used for operator services and directory assistance;

(3) petitions, including by wireless providers, seeking Link Up support for connection charges assessed at \$30.00 or more, with a voluntary waiver by the provider of any charges in excess of the maximum Link Up reimbursement; and

(4) petitions by entities that use management companies or third-party entities to manage the petitioners' intended low-income services.

Ms. DeYoung further reported that she would supply a sample working list of recent ETC petitions filed with various state commissions. This list is attached as Attachment A.

Pursuant to Section 1.1206 of the Commission's rules, this notice is being filed electronically via ECFS with your office. Please contact Ms. DeYoung directly at (617) 368-1141 should you have any questions.

Sincerely,

/s/ Karlen Reed
Karlen Reed, Director
Competition Division

/s/ Kerri J. DeYoung
Kerri J. DeYoung, Counsel
Competition Division
Kerri.DeYoung@state.ma.us

Massachusetts Department of
Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

KJD/kr

Enc.

cc: Angela Kronenberg (w/enc.)
Carol Matthey (w/enc.)

ATTACHMENT A
MDTC EX PARTE – 11/10/2011
WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45

SAMPLE LIST OF RECENT ETC PETITIONS

Note: Much of this information was courteously compiled and provided through the dedication and work of Bob Casey, Public Utilities Supervisor of the Florida Public Service Commission, and the ETC State Coordinating Group. In addition, this list does not represent all petitions filed recently with state commissions. Most of these petitions involve limited ETC designation for low-income support only, and most are currently pending before the different state commissions. Finally, a majority of these petitions involve wireless providers.

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
ALABAMA	T-Wire Corporation	Docket No. 31628	9/12/2011
	Tele Circuit Network Corporation	[not assigned as of 11/10/2011]	9/12/2011
ALASKA	GCI Communication Corp.	Docket No. U-11-071	
ARIZONA	i-wireless, LLC	Docket No. T-20538A-10-0332	8/5/2010
	Cricket Communications, Inc.	Docket No. T-20721A-10-0019	1/20/2010
	T-Mobile West Corporation	Docket No. T-20822A-11-0394	10/26/2011
	Transworld Network, Corp.	Docket No. T-04246A-11-0377	10/13/2011
	Midwestern Telecommunications, Inc.	Docket No. T-20819A-11-0365	10/4/2011
	Budget Prepay, Inc. dba Budget Phone, Inc.	Docket No. T-04079A-11-0362	9/29/2011
	Aegis Telecom, Inc. dba Off The Hook Telecom	Docket No. T-20816A-11-0339	9/8/2011
	TerraCom, Inc.	Docket No. T-20802A-11-0174	4/22/2011
	Absolute Home Phones dba Absolute Mobile	Docket No. T-20811A-11-0273	7/8/2011
ARKANSAS	US Connect LLC	Docket No. 11-052-U	5/16/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	OneLink Wireless, Inc.	Docket No. 11-102-U	9/27/2011
	Cricket Communications, Inc.	Docket No. 11-155-U	10/27/2011
CALIFORNIA	Telscape Communications (wireline)	Resolution T-17340	6/7/2011
	Telscape Communications (wireless)	Resolution T-17339	5/31/2011
	YourTel Wireless		
	TAG Mobile		
	SureWest Televideo	Draft Resolution T-17345	
COLORADO	Virgin Mobile	Docket No. 11A-657T	8/8/2011
	i-wireless, LLC	Docket No. 11A-776T	
	TerraCom, Inc.	Docket No. 11A-744T	
	TAG Mobile	Docket No. 11A-815T	
	Union	Docket No. 09A-771T	10/27/2009
	NNTC	Docket No. 08A-508T	11/14/2008
CONNECTICUT			
DELAWARE			
DISTRICT OF COLUMBIA	None Pending		
FLORIDA	Image Access, Inc., d/b/a New Phone	Docket No. 080523-TX	8/5/2008
	digitalIPvoice, Inc.	Docket No. 110218-TX	7/11/2011

Note: FL PSC no longer holds wireless ETC designation authority as of July 1, 2011.

Nexus Communications, Inc. - wireless petition filed June 3, 2011 at FCC N/A

TAG Mobile LLC - wireless petition filed June 7, 2011 at FCC N/A

i-wireless, LLC - wireless petition filed June 15, 2011 at FCC N/A

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Budget PrePay, Inc. wireless petition - filed August 1, 2011 at FCC	N/A	
	Platinum Tel Communications, LLC wireless petition filed August 5, 2011 at FCC	N/A	
	Cintex Wireless, LLC - wireless petition filed August 29, 2011 at FCC	N/A	
GEORGIA	TrustedNet, Inc.	Docket No. 10162	7/8/2010
	i-Wireless, LLC	Docket No. 25481	8/6/2010
	dpi Mobile, LLC	Docket No. 32831	10/12/2010
	Midwestern Telecommunications, Inc. (M.T.I.)	Docket No. 32867	10/29/2010
	Absolute Home Phones, Inc. dba Absolute Mobile	Docket No. 32869	11/1/2010
	AmeriMex Communications Corporation	Docket No. 32948	11/10/2010
	T-Mobile South, LLC	Docket No. 32967	11/16/2010
	Yourtel America, Inc.	Docket No. 33385	1/20/2011
	Capital Communications Consultants, Inc.	Docket No. 33466	2/3/2011
	True Wireless, LLC	Docket No. 33484	2/11/2011
	Global Connection Inc. of America	Docket No. 33600	2/21/2011
	US Connect LLC	Docket No. 33827	3/31/2011
	Cintex Wireless, LLC	Docket No. 33990	5/3/2011
	T-Wire Corporation	Docket No. 34127	5/26/2011
	OneLink Wireless, Inc.	Docket No. 34152	6/3/2011
	Budget Prepay, Inc.	Docket No. 34271	7/1/2011
	EveryCall Communications, Inc.	Docket No. 34444	8/15/2011
HAWAII	None Pending (as of 11/10/2011)	Docket No. 2011-0145	6/27/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
IDAHO	Nexus Communications	Case No. NCI-T-11-01	4/6/2011
	True Wireless	Case No. TWI-T-11-01	3/22/2011
	Cricket Communications, Inc.	Case No. CRI-T-11-01	11/7/2011
	Virgin Mobile	Case No. VMU-T-11-01	2/3/2011
	TracFone	Case No. TFW-T-09-01	10/29/2009
ILLINOIS	Linkup Telecom, Inc.	Case No. 11-0400	5/9/2011
	Conexions, LLC	Case No. 11-0370	4/26/2011
	Safari Communications, Inc.	Case No. 11-0440	5/19/2011
	SOS Telecom, Inc. (wireless)	Case No. 11-0471	6/7/2011
	Assist Wireless, LLC	Case No. 11-0488	6/14/2011
	TAG Mobile, LLC	Case No. 11-0543	7/25/2011
	Everycall Communications, Inc.	Case No. 11-0551	7/27/2011
	Global Connection, Inc. of America d/b/a Stand Up (wireless)	Case No. 11-0579	8/10/2011
	US Connect, LLC	Case No. 11-0583	8/12/2011
	IQ Telecom, Inc. (wireless)		
Cal Communications, Inc.			
INDIANA	Denali Spectrum Operations, LLC d/b/a Cricket	Docket No. 41052-ETC-57	9/30/2010
	TracFone Wireless, Inc.	Docket No. 41052-ETC 54	6/22/2009
	Virgin Mobile USA, LP	Docket No. 41052-ETC 55	2/4/2010
	i-Wireless LLC	Docket No. 41052-ETC 56	8/25/2010
	Telrite Corporation d/b/a Life Wireless	Docket No. 41052-ETC-58	2/14/2011
	Nexus Communications, Inc.	Docket No. 41052-ETC-59	4/11/2011
	TerraCom, Inc.	Docket No. 41052-ETC 60	4/12/2011
IOWA	Hardin County Wireless	Docket No. 199 IAC 39.2(4)	6/5/2006

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Midwestern Telecommunications	Docket No. ETA-2011-0009	10/28/2011
	Western Calhoun Cooperative Telephone Association	Docket No. ETA-2011-0007	9/22/2011
	Hospers Telephone Exchange d/b/a HTC Communications	Docket No. ETA-2011-0010	10/31/2011
	Greenway Communications	Docket No. IAC-2010-3902	3/28/2011
	Nexus Communications, INC	Docket No. ETA-2011-0002	3/21/2011
	Budget Prepay, INC	Docket No. ETA-2011-0008	10/28/2011
	TerraCom, INC	Docket No. ETA-2011-0001	3/11/2011
	Dixon Telephone Company	Docket No. ETA-2011-0011	11/3/2011
	Hamilton county Wireless	Docket No. ETA-2011-0006	9/9/2011
	Gazelle Link	Docket No. IAC-2010-3902	5/5/2010
KANSAS	Giant Communications CLEC	Docket No. 12-GCIT-113-ETC	8/18/2011
	Every Call Communications d/b/a All American Wireless	Docket No. 12-EVCT-115-ETC	8/22/2011
	i-wireless	Docket No. 11-IWRZ-261-ETC	9/28/2010
	dPi Teleconnect	Docket No. 08-DPIT-713-ETC	1/28/2008
	True Wireless	Docket No. 11-TWLZ-654-ETC	3/22/2011
	Virgin Mobile	Docket No. 10-VMBZ-657-ETC	4/12/2010
	Global Connect, Inc. of America d/b/a StandUp Wireless	Docket No. 11-GCAT-661-ETC	3/23/2011
	Telrite Corporation d/b/a Life Wireless	Docket No. 11-RITC-727-ETC	3/21/2011
	Midwestern Telecommunications d/b/a M.T.I.	Docket No. 11-MWTZ-647-ETC	3/11/2011
	LinkUp Telecom, Inc.	Docket No. 11-LUTC-491-ETC	1/6/2011
	Easy Wireless	Docket No. 11-ETWZ-424-ETC	12/7/2010
	Assist Wireless	Docket No. 11-AWLZ-858-ETC	6/8/2011
	YourTel America	Docket No. 03-TPCT-355-ETC	11/4/2002

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Budget Prepay Wireless	Docket No. 12-BGPT-091-ETC	8/9/2011
KENTUCKY	Nexus Communications, Inc.	Case No. 2009-00110	3/12/2009
	i-wireless, LLC.	Case No. 2010-00478	7/26/2010
	Easy Telephone	Case No. 2011-00137	4/13/2011
	Budget Prepay, Inc. DBA Budget Phone	Case No. 2011-00169	5/10/2011
	TAG Mobile, LLC	Case No. 2011-00312	8/23/2011
	Cintex Wireless	Case No. 2011-00447	
	Cricket Wireless	Case No. 2011-00382	
	Capital Communications Consultants, Inc.	Case No. 2011-00029	1/27/2011
	SE Acquisitions, LLC	Case No. 2011-00356	8/30/2011
LOUISIANA	NewPhone Wireless LLC	Docket No. S-31932	5/4/2011
	i-wireless, LLC	Docket No. S-31851	3/3/2011
	TerraCom, Inc.		3/28/2011
MAINE	YourTel America	Docket No. 2011-160	
	Gulf Coast Wireless	Docket No. 2011-252	7/18/2011
	Telrite d/b/a Life Wireless	Docket No. 2011-310	9/7/2011
MARYLAND	Cellspan, Inc.	Mail Log # 133924	9/1/2011
MASSACHUSETTS	YourTel America, Inc.	Docket No. 11-1	2/10/2011
	Conexions, LLC d/b/a Conexion Wireless (petition withdrawn)	Docket No. 11-3	
	Safari Communications, Inc.	Docket No. 11-4	4/28/2011
	Aegis Telecom, Inc. d/b/a Off the Hook Telecom	Docket No. 11-5	4/28/2011
	Nexus Communications, Inc.	Docket No. 11-7	6/9/2011
	TAG Mobile, LLC	Docket No. 11-8	7/13/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Global Connection, Inc. of America d/b/a Stand Up	Docket No. 11-11	9/13/2011
	Budget PrePay, Inc.	Docket No. 11-12	9/19/2011
	T-Mobile Northeast, LLC	[not assigned as of 11/10/2011]	11/10/2011
MICHIGAN	Cintex Wireless, LLC	U-16806	5/27/2011
	Easy Telephone Service	U-16476	11/17/2010
	i-wireless, LLC	U-16465	10/5/2010
	Midwestern Communications	U-16461	9/28/2010
	EveryCall Communications, Inc. d/b/a All American Wireless	U-16829	7/12/2011
	American Broadband and Telecommunications	U-15726	10/30/2010
	YourTel America, Inc.	U-16534	1/18/2011
	Telrite Corporation	U-16557	2/17/2011
	Assurance Home Phone Service d/b/a Surety Wireless	U-16575	3/25/2011
	Global Connection Inc. of America d/b/a Stand Up Wireless	U-16577	3/28/2011
	TAG Mobile, LL	U-16792	5/10/2011
	Budget Prepay Inc.	U-16803	5/25/2011
MINNESOTA	T-Mobile	P-6856/M-11-123	2/8/2011
	Midcontinent	P-6186/M-11-399	5/2/2011
	FiberNet Monticello	P-6726/M-11-437	5/13/2011
	TerraCom	P-6861/M-11-202	3/11/2011
	Assurance Home Phone Services Inc. dba Surety	P-6862/M-11-269	3/31/2011
	Virgin Mobile	P-6863/M-11-314	4/6/2011
	Midwestern Telecommunications	P-6849/M-10-1174	5/26/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Telrite dba Life Wireless	P-6862/M-11-132	2/11/2011
	i-wireless dba K-wireless	P-6867/M-11 -473	5/24/2011
	Nexus Communications	P-6656/M-10-264	3/25/2010
	Budget PrePay	P-6402/M-11-976	9/29/2011
	TracFone	P-6823/M-09-802	7/1/2009
MISSISSIPPI	Four Star Marketing	10-UA-316	9/3/2010
	Easy Telephone Service	10-UA-343	9/21/2010
	TerraCom, Inc.	10-UA-428	12/15/2010
	Link Up Telecom, Inc.	10-UA-429	12/17/2010
	T-Mobile South LLC	10-UA-431	12/21/2010
	Assurance Home Phone Service d/b/a Surety Wireless	11-UA-24	1/27/2011
	Telrite Corporation	11-UA-25	1/27/2011
	Budget Prepay	11-UA-81	3/9/2011
	Assist Wireless	11-UA-132	4/18/2011
	PhoneAid Communications Corporation	11-UA-139	4/19/2011
	Midwestern Telecommunications, Inc.	11-UA-145	5/10/2011
	i-wireless, LLC	11-UA-182	6/23/2011
MISSOURI	Assist Wireless	RA-2011-0384	5/27/2011
	Easy Telephone	TA-2011-0164	12/7/2010
	iwireless, LLC	TA-2011-0377	5/20/2011
	Aegis d/b/a Off the Hook Telecom	RA-2011-0349	4/20/2011
	Stand Up Wireless	RA-2011-0299	3/23/2011
	True Wireless	RA-2011-0265	
	Chariton Valley Telecom	TA-2012-0128	10/26/2011
	Cintex Wireless, LLC	RA-2012-0076	9/9/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Budget PrePay	TA-2010-0146	8/8/2011
MONTANA	iSmart Mobile		
NEBRASKA	TracFone Wireless, Inc.	C-4150/NUSF-76	3/9/2009
NEVADA	Absolute Home Phones dba Absolute Mobile	11-08017	8/18/2011
NEW HAMPSHIRE			
NEW JERSEY	Xchange	TO09080717	8/26/2009
	MaxSip	TO10100772	10/18/2010
	Cintex	TO11010029	1/18/2011
	Yourtel	TO11020059	2/4/2011
	Telrite	TO11020070	2/16/2011
	Conexions Wireless	TO11030104	2/25/2011
	I-Wireless	TO11030109	3/1/2011
	True Wireless	TO11030110	3/1/2011
	Aegis (Off the Hook Telecom)	TO11030144	3/16/2011
	Gulf Coast	TO11030146	3/17/2011
	TAG Mobile	TO11050313	5/19/2011
	Budget Prepay Inc	TO11080486	8/8/2011
NEW MEXICO	TracFone		
	Terra Com		
	Virgin Mobile		
	Cricket		
	Midwestern Telecom		
NEW YORK			
NORTH CAROLINA	New Dimensions Communications	P-100, Sub 133c	3/8/2010

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	All American Telecom	P-100, Sub 133c	3/8/2010
	Capital Communications Consultants, Inc.	P-100, Sub 133c	9/30/2011
	Safari Communications	P-100, Sub 133c	9/21/2010
NORTH DAKOTA			
OHIO	Cricket Communications	11-3963-TP-UNC	6/27/2011
	Nexus Communications	10-432-TP-UNC	
	Budget Prepay	11-5315-TP-UNC	9/28/2011
	Cintex Wireless	11-5475-TP-UNC	10/17/2011
	i-wireless	11-0571-TP-UNC	2/3/2011
OKLAHOMA	Nexus Wireless	200900138	
	TAG Mobile	201100004	
	SafeTel Wireless	201100136	8/26/2011
	Assist Wireless	201100137	
	Budget PrePay, Inc.	201000171	
	Cox Oklahoma Telecom, LLC	201100029	
	Easy Telephone Services Co.	201100004	
	Express Phone, Inc.	201000131	
	Fidelity Cablevision, Inc.		
	Lakeland Cellular	201000005	1/14/2010
	Head Start Telecom	201100078	5/4/2011
	Oklahoma Western Telephone Co.	201000113	
	Telrite Corp. d/b/a Life Wireless	201100139	
OREGON	T-Mobile	UM 1511	12/8/2010
	Warm Springs Telecom. Co.	UM 1549	7/18/2011
	TracFone	UM 1549	7/18/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Virgin Mobile	UM 1437	8/7/2009
	i-wireless	UM 1522	2/1/2011
	Nexus Communications	UM 1509	11/19/2010
	Aegis dba Off the Hook	UM 1533	3/21/2011
	YourTel	UM 1541	5/12/2011
PENNSYLVANIA			
RHODE ISLAND			
SOUTH CAROLINA	Budget Prepay, Inc.	2011-294-C	7/21/2011
	i-wireless LLC	2011-107-C	3/10/2011
	Midwestern Telecommunications, Inc.	2011-91-C	2/28/2011
	Allied Wireless	2010-385-C	11/29/2010
SOUTH DAKOTA			
TENNESSEE	Global Connections	09-00187	11/19/2009
	DPI	10-00147	7/19/2010
	Tele Circuit Network Corporation	11-00186	11/2/2011
	Absolute Home Phone	10-00202	10/21/2010
TEXAS	T-Mobile West Corp.	CO-2012-0043	
	TerraCom, Inc, d/b/a TerraCom Wireless	39261	
UTAH			
VERMONT	Nexus		
	TracFone		
VIRGINIA			
WASHINGTON	i-wireless, LLC	UT-101640	9/30/2010
	Telrite Corporation	UT-110321	2/17/2011
	Nexus Communications	UT-110518	3/21/2011

<u>State</u>	<u>Company</u>	<u>Docket Number</u>	<u>Date Filed</u>
	Gulf Coast Home Phone	UT-110883	5/9/2011
	Safari Communications	UT-110936	5/19/2011
	Global Connection Inc. of America	UT-110992	5/27/2011
	Midwestern Telecoms	UT-111045	6/9/2011
	Cintex Wireless	UT-111206	7/5/2011
	Cricket Communications	UT-111534	8/19/2011
	Budget PrePay, Inc.	UT-111570	8/29/2011
WEST VIRGINIA	OneLink Wireless, Inc.	11-1410-C-PC	
	Cellspan, Inc.	11-1298-C-PC	
	True Wireless LLC	11-1340-C-PC	
WISCONSIN	Absolute Home Phone	9584-TI-100	11/2/2010
	DPI –Teleconect, Inc.	7378-TI-102	10/27/2010
	Easy Telephone Company	9583-TI-100	10/7/2010
	IQ Telecom, Inc.,	7708-TI-101	11/30/2010
	Millenium 2000	9593-TI-100	5/25/2011
	Tel Rite Corporation	7709-TI-101	9/1/2010
	Terracom, Inc.	9590-TI-100	2/4/2011
	Budget PrePay, Inc.	826-TI-101	
	True Wireless	9591-TI-100	3/23/2011
	Virgin Wireless	9592-TI-100	4/21/2011
WYOMING			