

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	

**TAG MOBILE BROADBAND PILOT APPLICATION SUPPLEMENT**

TAG Mobile, LLC (“TAG Mobile”) hereby submits the following supplement to its application<sup>1</sup> for broadband pilot funding pursuant to the Federal Communications Commission’s (“Commission’s”) Public Notice.<sup>2</sup>

**I. TAG Mobile Proposes to Cap Most Participants at 2 GB But Include a Group of Broadband Recipients That Will Receive Unlimited Broadband**

As discussed in greater detail below, TAG Mobile proposes to implement a broadband pilot program involving a total of 550 participants – 110 participants in each of five markets. Twenty-five participants in each market will be the “control group” that will not receive any equipment or free broadband service, but does receive Lifeline telephone service from TAG Mobile. By definition, a control group is randomly selected from the population and does not receive the treatment, i.e., free broadband. Twenty-five participants in each market will consist of TAG Mobile customers that receive broadband service purchased at the standard price.

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<sup>1</sup> See TAG Mobile Broadband Pilot Application, WC Docket No. 11-42 (filed July 2, 2012) (“Application”).

<sup>2</sup> See Wireline Competition Bureau Announces Application Procedures and Deadline for Applications to Participate in the Broadband Adoption Lifeline Pilot Program, WC Docket No. 11-42, Public Notice, DA 12-683 (Apr. 30, 2012) (“Public Notice”).

Twenty-five participants in each market will receive a free laptop, a free MiFi device and free broadband service capped at 2 GB each month. Twenty-five participants in each market will receive a free laptop, a free aircard device and free broadband service capped at 2 GB each month. TAG is currently working with its underlying providers to develop a method to notify participants when they reach 80 percent of the 2 GB cap. In addition, all participants subject to the 2 GB cap will be notified of this cap during the application process.

In order to study how much broadband data customers will use if not limited by the plan, TAG Mobile also proposes to include five participants that will receive a free laptop, a free MiFi and unlimited free broadband each month, and another five participants that will receive a free laptop, a free aircard and unlimited free broadband each month. Those ten participants in each market will not be subject to any cap on data uploads or downloads, but will be subject to TAG Mobile's general terms and conditions regarding acceptable use and abuse of its network. *See <http://tagmobile.com/site/terms-conditions.aspx>.*

Each participant receiving free broadband service will receive a free refurbished laptop computer with the following specifications:

- Internet/WiFi Enabled
- 12.1 inch Wide Screen
- Dell Latitude D430 with an Intel Core Centrino Dual Core Processor,
- 2 GB DDR Memory 80 GB SATA Hard Drive
- 4 USB ports
- 1 PCI-MCA port
- Each of these laptops comes with Windows Vista Business Operating System.

The MiFi devices will meet the following specifications:

- Product Dimensions: 3.5 x 2.3 x 0.4 inches
- Weight: 2.24 ounces
- Network Compatibility: CDMA
- Battery Type: Lithium Ion
- Internal battery provides up to four hours on the road or 40 hours of standby time

- Advanced security and authentication technologies; VPN capabilities; two-way text messaging (Windows only); compatible with Windows, Mac and Linux
- What's in the box: MiFi 2200, rechargeable battery, wall charger, USB cable, quick reference guide, and software.

The USB MBB Modem/Aircard will meet the following specifications:

- Width 0.9 in x Depth 2.9 in x Height 0.5 in
- Weight 0.7 oz
- Interface Type USB
- Connectivity Technology Wireless
- Max Transfer Rate 3.1 Mbps
- Cellular Protocol CDMA 2000 1X EV-DO Rev. A, CDMA 2000 1X EV-DO Rev.
- Integrated Internal Antenna
- Software Included Drivers & Utilities

## **II. TAG Mobile Proposes to Add West Virginia to its Broadband Pilot**

In its Application, TAG Mobile proposed to conduct its broadband pilot in St. Louis, Missouri; Little Rock, Arkansas; Baltimore, Maryland; and Louisville, Kentucky.<sup>3</sup> TAG Mobile was also an authorized ETC in West Virginia before the application deadline on July 2, 2012. Therefore, TAG Mobile can add a pilot group to Charleston, West Virginia. Adding this fifth market will allow for a group of sixty customers in each geographic location that receive free broadband service, for a total of 300. Another twenty-five participants in each location will serve as the control group that does not receive broadband service and twenty-five participants in each location will purchase standard broadband service without subsidy.

The total budget proposed for this pilot is \$166,875.00. This amount includes \$46.00 per month for the twelve months of broadband service for 300 subsidized participants (\$166,455.00) and a \$4.25 non-recurring fee (includes network access, laptop programming, and account set up

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<sup>3</sup> See Application at 2.

fees) for each of the 300 participants to activate service (\$1,275.00) total.<sup>4</sup> TAG Mobile is seeking a \$46.00/month subsidy for the fifty participants that will receive unlimited broadband for free, which is the same amount as those participants that receive up to 2 GB of data. TAG Mobile will absorb the additional cost for the unlimited plans.

### **III. TAG Mobile Will Offer Broadband Service to its Existing Lifeline Customers**

TAG Mobile will randomly solicit participation in the broadband pilot from its existing customer base, however, it will narrow the potential pool of participants to those customers that have lived at their current residence for at least six months. Narrowing the pool in this manner makes it more likely that the customers will respond to TAG Mobile's survey questions and purchase unsubsidized broadband service from TAG Mobile after the broadband pilot is complete.

The twenty-five participants who constitute as the control group in each location will receive an incentive (e.g., gift card) for responding to survey questions regarding their broadband use. These customers may use broadband at a friend's house, at the public library or at work and TAG Mobile will collect data that will allow it or the Commission to compare the number of hours spent using broadband and the activities undertaken using broadband for those that do not have broadband service in their home versus those participants that receive free broadband service from TAG Mobile or purchase broadband service from TAG Mobile at the standard rate.

The twenty-five participants that purchase broadband from TAG Mobile, but do not receive any free equipment or free service from TAG Mobile will also be given an incentive to respond to the survey questions regarding their broadband use. The sixty participants that

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<sup>4</sup> TAG Mobile has removed the proposed reimbursement for costs for its digital literacy program, additional resources (educational, healthcare and job resource applications) and administrative costs that were included in its Application. *See* Application at 5.

receive free broadband service from TAG Mobile will be required to respond to survey questions as a condition of receiving the free service.

In order to obtain 110 participants in each geographic area, TAG Mobile expects to send an initial round of solicitations to 185 TAG Mobile customers, which assumes an approximately sixty percent acquisition rate for participants. If TAG Mobile does not acquire enough participants for each treatment group and the control group from the initial solicitation, it will continue with additional solicitations. These solicitations will include written materials sent by mail and by text message to existing customers, and may include offering particular services to customers that enter TAG Mobile retail stores to make a purchase or sign up for Lifeline service. Potential participants must state that they are interested in using wireless broadband services and that they are willing to respond to surveys regarding their broadband usage.

Survey data will be collected from all participants, primarily through Interactive Voice Response (“IVR”) whereby participants are asked to call TAG Mobile and answer automated questions designed by TAG Mobile in conjunction with its partner the Public Utility Research Center (“PURC”)<sup>5</sup> and consistent with the information collection requirements reflected in the Public Notice.<sup>6</sup>

#### **IV. Conclusion**

TAG Mobile has designed a small but statistically significant broadband pilot application to collect information regarding wireless data usage and the impact of digital literacy training on low-income consumers. The pilot will include a free refurbished laptop for each participant receiving free broadband service and either a MiFi or aircard device for broadband access.

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<sup>5</sup> For information regarding PURC, see Application at 8-9, Exhibits F and G.

<sup>6</sup> The Appendix includes data collection requirements and specifically Blocks G and H include information to be collected from the subscriber.

Further, TAG Mobile's broadband pilot will compare broadband usage by participants that receive free broadband service against its Lifeline customers that do not have broadband service, and compare usage of a number of participants that receive broadband plans with unlimited data in order to determine how much broadband low-income consumers will demand if restrictions are lifted. Selecting TAG Mobile's broadband pilot application for funding will further the Commission's goals of collecting useful information regarding the use of different types of broadband service by low-income consumers in various geographic areas.