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May 16, 2013

VIA ECFS

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

Re: Boomerang Wireless, LLC Notice of *Ex Parte* Presentation; WC Docket Nos. 11-42, 09-197

Dear Ms. Dortch:

Boomerang Wireless, LLC (“Boomerang”) is concerned that some of the current criticism of the Lifeline program is based on myths rather than facts and that this threatens to undermine the program and potentially take it in the wrong direction. Boomerang agrees with those ETCs that have emphasized the importance of pre-paid wireless offerings to the Lifeline program and the low-income consumers it serves. Boomerang also commends Congresswoman Matsui, Congressman Waxman and Congresswoman Eshoo for their continued leadership with respect to the Lifeline program and the important constituencies that benefit from it, and for their vision for the inclusion of broadband under the Lifeline program under the proposed Broadband Adoption Act of 2013.¹

Boomerang includes data capability on the handsets it distributes to its subscribers of pre-paid wireless Lifeline services and the company recently completed a research project with Dr. Caroline Tolbert of the University of Iowa regarding enTouch Lifeline customers and their Internet use. Highlights include the following:

¹ See Press Release, “Matsui, Waxman, Eshoo Introduce Legislation to Expand Lifeline for Universal Broadband Adoption (Apr. 23, 2013), available at http://matsui.house.gov/index.php?option=com_content&view=article&id=3435:matsui-waxman-eshoo-introduce-legislation-to-expand-lifeline-for-universal-broadband-adoption&catid=52:2013-news.

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Demographic profile. Women comprise 63 percent of the sample and nearly half of the respondents are between the ages of 30 and 49 (middle age). Almost 80 percent are African American. Roughly half had only a high school degree or equivalent (GED), while 25 percent did not complete high school. The respondents are very poor compared to national averages with almost 72 percent earning annual incomes less than \$10,000.

Internet Access: Only 29 percent report having broadband at home compared to 65 percent of Americans overall. Yet, rates of mobile access on cell phones (or smartphones) are comparable to the general population. 42 percent use the Internet on a cell phone compared to 45 percent of the general population. Respondents rely primarily on mobile Internet use.

Online Activities: The top 4 reported activities were:

- Look for a job
- Use maps
- Find a place to live
- Find health information

These findings demonstrate that pre-paid wireless services are critical to bridging the digital divide. In an age when mobility and broadband Internet access are seen as essential for the social and economic well-being of all Americans, attempts to limit Lifeline to landline voice services should be soundly rejected as inconsistent with the Commission's mandate for the Lifeline program. Boomerang supports the Commission's efforts to ensure that the Lifeline program is free of waste, fraud and abuse. However, Boomerang urges the Commission to remain mindful of the evolving communications needs of the low-income Americans for whom the Lifeline program was created when responding to critics of the program. Low-income consumers should not be denied the benefits of competition² or the advanced wireless communications services seen as essential to America's social and economic welfare.

² Boomerang's application for designation as an ETC in nine states and the District of Columbia has been pending with the Commission since December 2010.

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This letter is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann

Counsel to Boomerang Wireless, LLC

cc: Kimberly Scardino
Radhika Karmarkar
Jonathan Lechter
Alexander Minard
Michelle Schaefer