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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Accepted/Files

JAN 10 2014

Federal Communications Commission  
Office of the Secretary

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| In the Matter of )                              |                  |
| Request for Review by Boomerang Wireless, LLC ) | WC Docket 11-42  |
| Of Decision of the Universal Service )          | WC Docket 03-109 |
| Administrator )                                 |                  |
| _____ )   |                  |

**SUPPLEMENT TO REQUEST FOR REVIEW**

On January 7, 2014, Boomerang Wireless, LLC (“Boomerang Wireless”), by and through its attorneys, and pursuant to Section 54.719(c) of the Federal Communications Commission’s (“FCC” or “Commission”) rules, filed a Request for Review<sup>1</sup> respectfully requesting that the Commission review and vacate findings regarding intra-company duplicates by the Universal Service Administrative Company (“USAC”) in connection with two in-depth validations (“IDV”) of Boomerang Wireless’s Low Income Support Mechanism benefits in the states of Iowa and Oklahoma.<sup>2</sup> Boomerang Wireless asserted that USAC’s December 2013 IDV findings regarding intra-company duplicates exceed FCC guidance and otherwise reach results that impermissibly ignore differences in FCC mandated subscriber data fields by concluding that accounts that contain similar but not identical subscriber information are nevertheless duplicates.

<sup>1</sup> Boomerang Wireless, LLC Request for Review, WC Docket Nos. 11-42, 03-109 (filed Jan. 7, 2014).

<sup>2</sup> Letter from USAC to Lori Aller, Boomerang Wireless, LLC, re: Federal Universal Service Low Income Support Mechanism In-Depth Validation Phase 18, Dec. 30, 2013 (attached as Confidential Exhibit 1). Letter from USAC to Lori Aller, Boomerang Wireless, LLC, re: Federal Universal Service Low Income Support Mechanism In-Depth Validation Phase 21, Dec. 30, 2013 (attached as Confidential Exhibit 2).

In addition to seeking to vacate USAC's findings of intra-company duplicates for 16 of the 17 alleged duplicates, Boomerang Wireless is seeking reversal of the reimbursement and de-enrollment order in USAC's finding letter for five of the alleged duplicates. Boomerang Wireless submits this supplement to provide additional information regarding those five alleged duplicates.

For two of the five alleged duplicates, Boomerang collected and provides as Exhibit A an Independent Economic Household ("IEH") worksheet for each of the two alleged duplicate pairs. The **BEGIN CONFIDENTIAL** **END CONFIDENTIAL** IEH form indicates that he lives at an address with his parent (who is the other person at the address that is also a Boomerang Wireless customer – **BEGIN CONFIDENTIAL** **END CONFIDENTIAL**), but that the address "includes more than one household." As he is expressly permitted to do under the *Lifeline Reform Order*,<sup>3</sup> the subscriber certified that he lives at an address occupied by multiple households and that he understands the one-per-household requirement.

The **BEGIN CONFIDENTIAL** **END CONFIDENTIAL** IEH form indicates that he lives at an address with his adult son (who is the other person at the address that is a Boomerang Wireless customer – also **BEGIN CONFIDENTIAL** **END CONFIDENTIAL**), but that the address "includes more than one household." As he is expressly permitted to do under the *Lifeline Reform Order*, the subscriber certified that he lives at an address occupied by multiple households and that he understands the one-per-household requirement.

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<sup>3</sup> See *Lifeline and Link Up Reform and Modernization, et al.*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, 27 FCC Rcd 6656, FCC 12-11, ¶ 78 (rel. Feb. 6, 2012) ("*Lifeline Reform Order*").

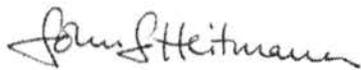
For the other three duplicate pairs, the subscribers have similar names, but different addresses and different dates of birth and/or SSNs. Included as **Exhibit B** is full subscriber information for these three duplicate pairs showing these differences (including the dates of birth and SSNs). These six subscribers (**BEGIN CONFIDENTIAL**

**END CONFIDENTIAL**), appear to be members of an ethnic minority and have similar sounding or looking names, but different addresses and dates of birth and/or SSNs. As stated in the Request for Review, de-enrolling such subscribers based on a “similar name or address” standard that is so subjective almost certainly will result in cutting off Lifeline service to eligible consumers, potentially in a discriminatory manner.

In the Request for Review, with one exception, Boomerang Wireless seeks a ruling vacating USAC’s finding of intra-company duplicates because there is no same name, same address match. For five of the 16 alleged duplicates, Boomerang Wireless is also seeking reversal of the reimbursement and de-enrollment order in USAC’s finding letter. In this Supplement, Boomerang Wireless provides additional support for that request in the form of IEH forms for two father and son alleged duplicate pairs and date of birth and SSN information for three other alleged duplicate pairs to show that USAC’s “similar name, similar address” arbitrary and non-transparent standard for duplicate definition could inadvertently result in racial profiling or at least something that might be perceived as racial profiling. Because these outcomes are so fundamentally at odds with Lifeline program rules, and warrant careful consideration of other important legal issues, Boomerang respectfully has sought Commission review of USAC’s findings.

Respectfully submitted,

**BOOMERANG WIRELESS, LLC**

By:   
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Dated: January 10, 2014

**Confidential Exhibit A**  
**(Redacted)**

**Confidential Exhibit B**  
**(Redacted)**