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January 31, 2014

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:

On Wednesday, January 29, 2014, Dennis Henderson from Boomerang Wireless, LLC (“Boomerang”) and Joshua Guyan from Kelley Drye & Warren LLP spoke with Garnet Hanly, Anita Patankar-Stoll and Jay Schwarz of the Wireline Competition Bureau on a conference call to discuss Boomerang’s experience with providing wireless broadband data services to its Lifeline customers and a possible additional Lifeline plan that would include a monthly fee to the customer for a certain amount of broadband data.

During the call, Mr. Henderson explained that Boomerang has seen an exciting response from Boomerang’s Lifeline customers in response to the company’s offer to include a small amount of data service at no extra charge with its existing plans, and the company believes there is a desire for greater access to mobile broadband on the part of low-income customers. Boomerang has also seen a significant percentage of its Lifeline customers “top-up” with additional megabytes of data. Currently, Boomerang customers can purchase additional data at the following increments:

- 1) For \$5.00, the customer has thirty days from activation of the top-up to use 100 MB of data.
- 2) For \$10.00, the customer has thirty days from activation of the top-up to use 300 MB of data.

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- 3) For \$20.00, the customer has 30 days from activation of the top-up to use 1,200 anytime voice minutes or texts and 20 MB of data.
- 4) For \$30.00, the customer has 30 days from activation of the top-up to use unlimited anytime voice minutes or texts and 5 MB of data.
- 5) For \$50.00, the customer has 30 days from activation of the top-up to use unlimited anytime voice minutes, texts and data.¹

Mr. Henderson explained that Boomerang is considering the addition of a new Lifeline plan whereby, in addition to the free 125 or 250 minutes and the small amount of data already included with these plans at no extra cost to the customer, the customer could choose to pay some amount each month for a certain additional number of megabytes of data.² In addition, with upgraded smartphone devices that customers would purchase, they could also gain access to broadband through WiFi to the extent it was available. The staff asked how customers would pay for the service and Mr. Henderson explained that customers could pay in many ways including through the use of a credit or debit card or by purchasing “top-up” cards that could be decremented each month. Those customers that do not have the desire or ability to pay each month could remain on Boomerang’s free Lifeline service.

¹ These “top-up” increments can be found in Boomerang’s federal ETC petition. The “unlimited” plan is subject to Boomerang’s Acceptable Use Policy, which is detailed in Boomerang’s federal ETC petition. *See* Amended Petition of Boomerang Wireless for Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket no. 09-197 (Apr. 11, 2013) (originally filed Dec. 29, 2010).

² Boomerang would still offer its 125 minute and 250 minute plans to customers at no charge, so customers would not be required to pay any minimum amount each month.

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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,

A handwritten signature in cursive script that reads "Joshua Guyan".

Joshua T. Guyan

Counsel to Boomerang Wireless, LLC

cc: Garnet Hanly
Anita Patankar-Stoll
Jay Schwarz