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Via Electronic Filing

Mr. Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive, SW
Olympia, WA 98504

Re: Boomerang Wireless, LLC – Notice of Transfer of Control; Docket No. UT-121610

Dear Mr. Johnson:

Boomerang Wireless, LLC (Boomerang or Company), by its undersigned counsel, respectfully notifies the Washington Utilities and Transportation Commission (Commission) that it intends to consummate a transaction that will result in a material change in control of its ownership. On December 12, 2013, the Commission designated Boomerang as an Eligible Telecommunications Carrier in Washington for the purpose of providing federal Lifeline service.[1] It is Boomerang's understanding that prior Commission approval is not required for the contemplated transaction. Therefore, Boomerang submits this letter solely for the Commission's information.

Boomerang is currently majority-owned (51%) by HH Ventures, LLC (HH Ventures), an Iowa limited liability company, and minority-owned (49%) by ViaOne Acquisition Company LLC (ViaOne), a Delaware limited liability company. Prior to December 18, 2020, Boomerang was wholly owned by HH Ventures. On December 18, 2020, HH Ventures and ViaOne entered into a Membership Interest Purchase Agreement (Agreement) wherein ViaOne agreed to purchase Boomerang from HH Ventures. Under the Agreement, ViaOne initially acquired 49% of the Membership Interests owned by HH Ventures and it will now acquire the remaining 51% of Membership Interests, thereby gaining control

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[1]   *In re the Matter of the Petition of Boomerang Wireless, LLC, d/b/a enTouch Wireless, Seeking Designation as an Eligible Telecommunications Carrier in the State of Washington pursuant to 47 U.S.C.§ 214(e)(2) (Low Income Only)*, Order Granting Eligible Telecommunications Carrier Designation with Conditions and Exemption from Rule, Docket No. UT-121610, Order No. 01 (Dec. 12, 2013).

of Boomerang, upon receiving necessary regulatory approvals. ViaOne is a wholly-owned subsidiary of ViaOne Services LLC (ViaOne Services).

Following the proposed change in Boomerang's ownership, the Company's corporate and trade names and identifiers will remain unchanged. Furthermore, Boomerang's contact information on record with the Commission will remain unchanged. The proposed transaction will not result in any loss or impairment of service for any customer, and immediately following consummation of the transaction, customers will continue to receive their existing services at the same or better rates, terms, and conditions than currently in effect.[2] Thus, the proposed transaction holds no adverse effects for the Company's customers and, indeed, will be transparent to them.

Boomerang further advises the Commission that the proposed transaction will deliver meaningful public interest benefits to consumers in Washington. Boomerang focuses on providing Lifeline service to qualifying low-income consumers residing in Washington. ViaOne's parent company, ViaOne Services, has extensive experience in providing operational, marketing and regulatory compliance consulting services to wireless carriers. Following the transaction, Boomerang will be able to leverage fully ViaOne Services' expertise to continue to provide low-income consumers in Washington with high-quality voice and broadband Internet services.

Please contact me at (202) 342-8566 or jguyan@kelleydrye.com if there are any questions regarding this submission.

Respectfully submitted,

Joshua T. Guyan

Counsel for Boomerang Wireless, LLC

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[2]   Future changes to Boomerang's service offerings and/or the rates, terms and conditions applicable to those offerings will be implemented consistent with applicable regulatory requirements.

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