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October 13, 2016

Roger Hahn
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr. SW
Olympia, WA 98504

Re: Notification of Boomerang Wireless, LLC d/b/a enTouch Wireless and Total Call Mobile Regarding a Transfer of Customers

Dear Mr. Hahn,

Boomerang Wireless, LLC (Boomerang or the Company) and Total Call Mobile (Total Call and, together with Boomerang, the Parties) hereby notify the Washington Utilities and Transportation Commission (Commission) of their intention to transfer certain Total Call wireless Lifeline customers to Boomerang (the Transaction). For the Commission's records, the Parties provide the following information:

I. THE PARTIES

A. Boomerang Wireless, LLC d/b/a enTouch Wireless (Boomerang)

Boomerang is a limited liability company located at 955 Kacena Rd. Suite A, Hiawatha, IA 52233. The Company provides prepaid wireless services to customers in twenty-four states, including in Washington.¹ The Company has been designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireless basis in 27 states, currently serving approximately 260,000 Lifeline customers throughout its operating territory. Boomerang was designated by the Commission as an ETC to provide Lifeline services on a wireless basis on December 12, 2013 in Docket No. UT-121610. Boomerang currently serves approximately 7,847 Lifeline customers in Washington.

¹ Boomerang also holds international Section 214 authority from the Federal Communications Commission (FCC).

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B. Total Call Mobile (Total Call)

Total Call, a California corporation, is headquartered at 1411 W 190th St, Suite 700, Gardena, CA 90248. Total Call provides wireless services throughout the United States, including in Washington. Total Call has been designated as an ETC to provide Lifeline services to low-income consumers on a wireless basis in numerous states and Puerto Rico. The Commission designated Total Call as an ETC to provide wireless Lifeline services on March 27, 2014 in Docket No. UT-121524.

II. DESIGNATED CONTACTS

Correspondence or other materials concerning this Notification should be directed to:

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with a copy to:

Kimberley Lehrman
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President
955 Kacena Road, Suite A
Hiawatha, Iowa 52233
FAX: 319.743.1293
EMAIL: klehrman@readywireless.com

Saturo Manabe
President/CEO
Total Call Mobile
1411 W 190th Street
Suite 700
Gardena, CA 90248
EMAIL: saturo.manabe@kddia.com

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Customer Transfer Agreement dated October 12, 2016, (the Agreement), Total Call intends to transfer approximately 2,652 wireless customers in Washington to Boomerang. These Customers currently receive local exchange and long distance wireless Lifeline services from Total Call. Boomerang will not assume any of Total Call's pre-closing liabilities or obligations.

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To ensure a seamless transition and avoid customer confusion or inconvenience, the Parties will provide affected customers with notice at least ten (10) days prior to the transfer, using a form notice substantially similar to the one attached as **Exhibit 1**.

Following consummation of the Transaction, Boomerang will provide the transferred Lifeline customers with services that are improved compared to the plans they currently enjoy on the same underlying wireless network (i.e., acquired customers currently on the Sprint Wireless network will remain on that network). We have filed with Washington a 500 minutes voice + 100 text + 10 MB plan to which the consumers will be upgraded on their existing phones. This plan also meets the new voice minimum service standard as defined by the FCC's Lifeline Modernization Order,² which will be effective December 2, 2016. The consumer will not have to go through an additional plan change in December. Any future changes to the rates, terms and conditions of Boomerang's Lifeline service will be made consistent with Commission requirements. Moreover, because these customers will continue to be served utilizing the same underlying network, they will be able to continue using the same handsets and will enjoy access to the same coverage area.

III. PUBLIC INTEREST ANALYSIS

The proposed Transaction is in the public interest. Upon consummation, the transferred customers will continue to receive high-quality competitive local exchange and interexchange wireless Lifeline services, now delivered by Boomerang.

The Transaction has no adverse effects for the transferred Customers, who will receive notice in advance of the proposed transfer and may choose to remain with Boomerang or change to a new provider. Total Call and Boomerang will work together to ensure that the affected Customers experience a smooth, virtually seamless, transition.

² See *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order).

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IV. CONCLUSION

The Parties respectfully request that the Commission note the Transaction for its records. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

TOTAL CALL MOBILE

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