



February 20, 2014

VIA FEDEX AND E-FILING

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Supplement to the Petition of Total Call Mobile, Inc. for Limited Designation as an Eligible Telecommunications Carrier

Dear Sir or Madam:

Please find enclosed for filing an original and twelve (12) copies of the Supplement to the Petition of Total Call Mobile, Inc. for Limited Designation as an Eligible Telecommunications Carrier. I have supplemented this paper filing in accordance with WAC 480-07-145(2)(d) and WAC 480-07-140(6) by electronically submitting the Supplement to the Petition today, February 20, 2012. Enclosed is an extra copy of the Supplement to the Petition, which I ask that you date-stamp and return in the postage-paid, self-addressed envelope provided herein.

Should you have any questions about this submission, please do not hesitate to contact me at (310) 818-4300 or roberty@totalcallusa.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Yap", with a large, stylized flourish at the end.

Robert Yap, Esq.
Chief Administrative Officer & General Counsel
Total Call International, Inc.

Enclosures

Supplement to Total Call's Petition, Total Call meets all the statutory and regulatory requirements for designation as an ETC in the State of Washington, including the new requirements outlined in the FCC's *USF/ICC Transformation Order*⁵ and *Lifeline and Link Up Reform Order*.⁶ Rapid grant of Total Call's request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Washington residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition for ETC designation.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

Robert Yap
Chief Legal/Administrative Officer for Total Call Mobile, Inc.
1411 W. 190th St., Suite 700
Gardena, CA 90248
(310) 818-4300 (Phone)
(800) 710-0963 (Fax)
E-Mail: roberty@totalcallusa.com

II. TOTAL CALL'S UNIVERSAL SERVICE OFFERING

A. Proposed Lifeline Plans

ETC designation pending with Arkansas, California, Idaho, Minnesota, New Jersey, Pennsylvania, Rhode Island, South Dakota, and Vermont, and is awaiting designation as an ETC by the FCC in the states of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia; no such petitions have been denied.

⁵ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*").

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, 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, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

Total Call has the ability to provide all services and functionalities supported by the universal service program, as detailed in revised FCC Rule 54.101(a)⁷ throughout the State of Washington. Total Call intends to be a leader in the wireless marketplace by offering exceptional value and competitive amounts of voice usage at all price points to consumers.

Lifeline Offering. Total Call hereby requests the Commission to approve several amendments to its proposed Lifeline offering. Total Call's changes to its proposed Lifeline offering for Washington are consistent with changes that the Company is making to its Lifeline offering in other states, and may be summarized as follows: 1) remove the 150-Minute plan, and 2) add tribal plan offerings for eligible tribal subscribers. Total Call submits its amended proposed Lifeline offering for Washington as Amended Exhibit 2.

As demonstrated by Amended Exhibit 2, Total Call's Lifeline service offering proposes to give eligible non-tribal customers four (4) Lifeline Plan choices:

1. 250 Minute Plan. Under this Lifeline Plan 1, eligible non-tribal customers receive a free handset and 250 anytime minutes per month (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute). Additional usage is priced at 10 cents per minute and 5 cents per text.
2. Discounted Regular Plans. Eligible non-tribal customers may apply the Company's Lifeline discount of \$10.00 (i.e. which is greater than the \$9.25⁸ currently provided by the FCC) to the Company's 1000 anytime minutes plan⁹ (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute) (regularly \$29.99) (i.e. Lifeline Plan 2), 30-day Unlimited Talk & Text retail plan (regularly

⁷ See *Lifeline and Link Up Reform Order* at page 207, revised § 54.101(a).

⁸ See *Lifeline and Link Up Reform Order* at page 5.

⁹ For the 1000-minute plan, as an option, customer may use text, inbound or outbound, which consumes 1 plan minute. Additional usage is priced at 10 cents per minute and 5 cents per text.

\$39.99) (i.e. Lifeline Plan 3), the 30-day Unlimited Talk, Text & Data retail plan (regularly \$49.99) (i.e. Lifeline Plan 4).

Total Call’s Lifeline service offering also proposes to give eligible tribal customers two (2) Lifeline Plan choices:

1. Discounted Regular Plans. Eligible tribal customers may apply the Company’s Lifeline discount of \$39.99 (i.e. which is greater than the \$34.25¹⁰ currently provided by the FCC) to the Company’s 30-day Unlimited Talk & Text retail plan (regularly \$39.99) (i.e. Lifeline Tribal Plan 1), and the 30-day Unlimited Talk, Text & Data retail plan (regularly \$49.99) (i.e. Lifeline Tribal Plan 2).

Specifically, the discounted prices on Total Call’s amended Lifeline plans, which will be offered to qualified Lifeline consumers in Washington, are as follows:

<u>NON-TRIBAL OFFERINGS</u>		
<u>Plan</u>	<u>Retail price</u> (per month, per customer)	<u>Discounted price</u> (per month, per customer)
250-Minute Plan (i.e. Plan 1)	\$10.00	\$0.00
1000-Minute Plan (i.e. Plan 2)	\$29.99	\$19.99
Unlimited Talk & Text (i.e. Plan 3)	\$39.99	\$29.99
Unlimited Talk, Text & Data (i.e. Plan 4)	\$49.99	\$39.99
<u>TRIBAL OFFERINGS</u>		
<u>Plan</u>	<u>Retail price</u> (per month, per customer)	<u>Discounted price</u> (per month, per customer)
Unlimited Talk & Text (i.e. Tribal Plan 1)	\$39.99	\$0.00
Unlimited Talk, Text & Data (i.e. Tribal Plan 2)	\$49.99	\$10.00

There will be no non-recurring charges that will be applied to qualified low-income consumers in Washington purchasing from among the Lifeline offerings. Unused minutes on the 250-minute plan (i.e. Non-Tribal Plan 1) and the 1000-minute plan (i.e. Non-Tribal Plan 2) do

¹⁰ See *Lifeline and Link Up Reform Order* at page 5.

not roll-over to the next month. Please refer to the chart below for Total Call's analysis of the final price for monthly service to the consumer, before and after state and/or federal low-income discounts are applied:

<u>NON-TRIBAL OFFERINGS</u>					
<u>Plan</u>	<u>Retail price</u> (per month, per customer)	<u>Federal USF Support</u> (per month, per customer)		<u>Company subsidized discount</u> (per month, per customer)	<u>Final Price</u> (per month, per customer)
250-Minute Plan (i.e. Plan 1)	\$10.00	\$9.25		\$0.75	\$0.00
1000-Minute Plan (i.e. Plan 2)	\$29.99	\$9.25		\$0.75	\$19.99
Unlimited Talk & Text (i.e. Plan 3)	\$39.99	\$9.25		\$0.75	\$29.99
Unlimited Talk, Text & Data (i.e. Plan 4)	\$49.99	\$9.25		\$0.75	\$39.99
<u>TRIBAL OFFERINGS</u>					
<u>Plan</u>	<u>Retail price</u> (per month, per customer)	<u>Federal USF Support</u> (per month, per customer)	<u>Federal USF Support (Tribal)</u> (per month, per customer)	<u>Company subsidized discount</u> (per month, per customer)	<u>Final Price</u> (per month, per customer)
Unlimited Talk & Text (i.e. Tribal Plan 1)	\$39.99	\$9.25	\$25.00	\$5.74	\$0.00
Unlimited Talk, Text & Data (i.e. Tribal Plan 2)	\$49.99	\$9.25	\$25.00	\$5.74	\$10.00

Total Call does not impose burdensome credit checks or long-term service contracts on its prepaid customers. All Lifeline plans come with a free handset, free customer care calls, free balance inquiries, and access to voice mail, caller I.D. and call waiting features at no additional charge. Also, customers are not bound by a local calling area requirement; all Total Call plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Given this nationwide coverage, there is minimal need for roaming. As an additional precaution, Total Call blocks roaming ability on

its Lifeline handsets so that customers will not incur unexpected roaming charges. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

As demonstrated by Amended Exhibit 2, the Company's Lifeline offerings will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but will also give eligible customers access to a variety of rate plans that are comparable in minutes and features to those available to post-paid wireless subscribers but at low Lifeline rates and without the burden of credit checks or service contracts. Total Call's prepaid offering, therefore, will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

B. Plan Enrollment

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding Total Call's Lifeline service plans, including a detailed description of the programs and state-specific eligibility criteria.

For direct sign-ups, applicants may download an enrollment form from the Company's website. Alternatively, applicants may call the Company's toll-free telephone number and request that a Company customer service representative mail the applicant the enrollment form. The applicant must then complete and submit the Company's Lifeline enrollment form via mail or fax. The Lifeline enrollment form will require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by revised FCC Rule 54.410(d)¹¹. See Exhibit 3 for more detailed enrollment information.

For in-person events held by the Company and or the Company's distribution network, the applicant will be provided information (i.e. on paper or an electronic device) describing Total

¹¹ See *Lifeline and Link Up Reform Order* page 227-29.

Call's Lifeline program in detail, including federal and state specific eligibility requirements, instructions for enrolling, and a description of the one-per-household rule. A sales representative will assist applicants in signing-up for Total Call Lifeline service through an online application, which includes all applicable disclosures and certifications and that will be directly transmitted to the Company upon completion. The Company will review the application and will reject or approve the application based on both federal and state eligibility requirements. For all Washington subscribers, a Company employee will review and approve the application before the sales representative provides a Lifeline handset to approved applicants (i.e. only Company-approved Lifeline subscribers shall receive a Lifeline handset). Total Call will comply with all verification and validation processes established by the Commission.

II. TOTAL CALL SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

A. Five-Year Network Improvement Plan

WAC § 480-123-030(1)(d) states that petitions for designation as an ETC must contain “a substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how these expenditures will benefit customers.”¹² FCC Rule 54.202(a)(1)(ii) similarly requires a common carrier seeking ETC designation to submit a five-year plan improvement plan as part of its application¹³. Both these rules appear to be directed towards facilities-based carriers. Indeed, the FCC has stated that a common carrier seeking designation as a Lifeline-only ETC is not required to submit such a plan as part of its ETC application.¹⁴ Given that Total Call is not a facilities-based carrier and seeks ETC designation solely to provide Lifeline service to qualifying Washington consumers


¹² See WAC § 480-123-030(1)(d).

¹³ See *Lifeline and Link Up Reform Order* page 208, revised § 54.202(a)(1)(ii).

¹⁴ See *Lifeline and Link Up Reform Order* at ¶ 386.

(i.e. it will not seek access to funds from the Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas, Total Call hereby requests a waiver from WAC § 480-123-030(1)(d).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Hideki Kato', written over a horizontal line.

Hideki Kato
Chief Operating Officer of Total Call Mobile, Inc.
1411 W. 190th St., Suite 700
Gardena, CA 90248
(310) 818-4300 (Phone)

February 19, 2014

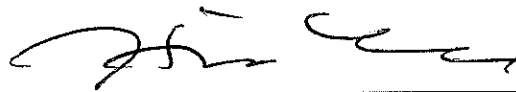
EXHIBIT 1

State of California)
)
County of Los Angeles)

Certification

Hideki Kato hereby states that he is the COO of Total Call Mobile, Inc., Applicant in this Supplement to Petition of Total Call Mobile, Inc. for Limited Designation as an Eligible Telecommunications Carrier, and has read the same and knows the contents thereof, and certifies under penalty of perjury under the laws of the State of Washington that the statements made herein are true and correct to the best of his knowledge and belief.

Dated: 2/19/2014
Place: Los Angeles



Hideki Kato, COO

Amended EXHIBIT 2
Proposed Lifeline Offering

Proposed Lifeline Offering

– **Non-Tribal Service Offering**

Total Call's Lifeline offering proposes to give eligible non-Tribal customers the following Lifeline Plan choices:

Plan 1: Lifeline 250 Minute Plan* (i.e. Plan 1)

250 anytime minutes per month (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute)

(additional usage priced at 10 cents per minute and 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

Plans 2, 3 & 4: Lifeline Credit - Discount Plan (30-Day Plans)*

Lifeline eligible non-tribal customers may choose the 30-day Unlimited Talk & Text plan; the 30-day Unlimited Talk, Text & Data; or the 30-day 1000 talk & 1000 text plan at a \$10 discount off of retail. Additional details regarding Total Call's plans can be found at www.totalcallmobile.com/rateplans_monthly.aspx. The pricing for Lifeline eligible customers are as follows:

1000 anytime minutes for 30 days at \$19.99 (as an option, customer may use text, inbound or outbound, which consumes 1 plan minute; additional usage priced at 10 cents per minute and 5 cents per text message) (retail price is \$29.99) (i.e. Plan 2)

Unlimited Talk & Text for 30 days at \$29.99 (retail price is \$39.99) (i.e. Plan 3)

Unlimited Talk, Text & Data for 30 days at \$39.99 (retail price is \$49.99) (i.e. Plan 4)

– **Tribal Service Offering**

Total Call's Lifeline offering proposes to give eligible Tribal customers the following Lifeline Plan choices:

Plans 1 & 2: Lifeline Credit - Discount Plan (30-Day Plans)*

Lifeline eligible tribal customers may choose the 30-day Unlimited Talk & Text plan or the 30-day Unlimited Talk, Text & Data at a \$39.99 discount off of retail. Additional details regarding Total Call's plans can be found at

www.totalcallmobile.com/rateplans_monthly.aspx. The pricing for Lifeline eligible customers are as follows:

Unlimited Talk & Text for 30 days at \$0.00 (retail price is \$39.99) (i.e. Tribal Plan 1)

Unlimited Talk, Text & Data for 30 days at \$10 (retail price is \$49.99) (i.e. Tribal Plan 2)

*All packages include:

- Free basic handset (customer may pay for upgrade)
- Free Voicemail, Caller-ID and Call Waiting features
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- International calls require additional funds based on call destination.

Amended EXHIBIT 6

Wire Center List

CONFIDENTIAL
Amended Exhibit 6

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
ASOTIN TELEPHONE CO.	
	ANATONE
	ASOTIN
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	
	COWICHE
	RIMROCK
	TIETON
CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	
	BLAKELY ISLAND
	EAST SOUND
	FRIDAY HARBOR
	LOPEZ
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	
	ALMIRA
	AMES LAKE
	ASHFORD
	CARNATION
	CATHLAMET
	CHENEY
	CHEWELAH
	CHINOOK
	CLALLAMBAY
	CLEARWATER
	CONNELL
	COULEE CITY
	CRESTON
	CURTIS
	DAVENPORT
	EDWALL-TYLER
	ELMA
	EUREKA
	FALL CITY
	FORKS
	FOX ISLAND
	GIG HARBOR
	GLENOMA
	HANSVILLE
	HARRINGTON
	KETTLE FALLS
	KINGSTON
	LAKE QUINAULT
	LIND
	LONG BEACH
	MATHEWS CORNER
	MCCLEARY
	MEDICAL LAKE

**CONFIDENTIAL
Amended Exhibit 6**

	MINERAL
	MONTESANO
	MORTON
	NEAH BAY
	NESPELEM
	NORTH BEND
	OCOSTA
	ODESSA
	ORTING
	OTHELLO
	PACIFIC BEACH
	PACKWOOD
	PE ELL
	RANDLE
	RAYMOND
	REARDAN
	RITZVILLE
	SNOQUALMIE PASS
	SOUTH BEND
	SOUTH PRAIRIE
	SPANGLE
	SPRAGUE
	STARBUCK
	TWISP
	VADER
	VASHON
	WASHTUCNA
	WILBUR
	WILSON CREEK
	YACOLT
ELLENSBURG TELEPHONE CO.	
	ELLENSBURG
	KITTITAS
	LAUDERDALE
	SELAH
	THORP
	VANTAGE
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	
	ACME-DEMING
	ANACORTES
	ARLINGTON
	BENTON CITY
	BLAINE-BIRCH BAY-GTLD
	BOTHELL1
	BOTHELL2
	BREWSTER
	BRIDGEPORT

CONFIDENTIAL
Amended Exhibit 6

	CAMAS-WASHOUGAL
	COUPEVILLE
	CURLEW
	CUSTER-GTLD
	DARRINGTON
	DEMING
	EVERETT
	EVERSON-GTLD
	FAIRFIELD
	FARMINGTON
	FERNDALE-GTLD
	GARFIELD
	GEORGE
	GRANITE FALLS
	GRAYLAND
	HALLS LAKE
	KENNEWICK
	KIRKLAND
	LA CONNER
	LATAH
	LAUREL
	LOOMIS
	LYNDEN-MAPLE FALLS
	MARYSVILLE
	MOLSON-CHESAW
	MONROE
	MOUNT VERNON
	NACHES
	NEWPORT
	NILE
	OAK HARBOR
	OAKESDALE
	PALOUSE
	PULLMAN
	QUINCY
	REPUBLIC
	RICHLAND
	RICHMOND BEACH
	ROCKFORD
	ROSALIA
	SEDRO WOOLLEY
	SILVER LAKE
	SKYKOMISH
	SNOHOMISH
	SOAP LAKE
	STANWOOD
	STEVENS PASS

CONFIDENTIAL
Amended Exhibit 6

	SULTAN
	SUMAS-GTLD
	TEKOA
	TONASKET
	WATERVILLE
	WENATCHEE
	WESTPORT
	WOODLAND
HAT ISLAND TELEPHONE CO.	
	HAT ISLAND
HOOD CANAL TELEPHONE CO.	
	UNION
INLAND TELEPHONE CO.	
	DEWATTO
	PRESCOTT
	ROSLYN
	UNIONTOWN
KALAMA TELEPHONE COMPANY	
	KALAMA
LEWIS RIVER TELEPHONE COMPANY, INC.	
	AMBOY
	COUGAR
	LA CENTER
	YALE
MASHELL TELECOM, INC.	
	EATONVILLE
MCDANIEL TELEPHONE CO.	
	MOSSYROCK
	SALKUM
PEND OREILLE TELEPHONE COMPANY	
	CUSICK
	IONE
	METALINE FALLS
PIONEER TELEPHONE CO.	
	ENDICOTT
	LACROSSE
QWEST CORPORATION	
	ABERDEEN-HOQUIAM
	AUBURN
	BAINBRIDGE ISLAND
	BATTLE GROUND
	BELFAIR
	BELLEVUE
	BELLINGHAM-GTLD
	BLACK DIAMOND
	BREMERTON
	BUCKLEY

CONFIDENTIAL
Amended Exhibit 6

	CASTLE ROCK
	CENTRALIA
	CHEHALIS
	CLARKSTON
	CLE ELUM
	COLFAX
	COLVILLE
	COPALIS
	COULEE DAM
	CRYSTAL MOUNTAIN
	DAYTON
	DEER PARK
	DES MOINES
	EASTON
	ELK
	ENUMCLAW
	EPHRATA
	GRAHAM
	GREEN BLUFF
	HOODSPORT
	ISSAQUAH
	KENT
	LIBERTY LAKE
	LONGVIEW-KELSO
	LOON LAKE
	MAPLE VALLEY
	MOSES LAKE
	NEWMAN LAKE
	NORTHPORT
	OLYMPIA
	OMAK
	OROVILLE
	OTHELLO
	PASCO
	PATEROS
	POMEROY
	PORT ANGELES
	PORT LUDLOW
	PORT ORCHARD
	PORT TOWNSEND
	PUYALLUP
	RENTON
	RIDGEFIELD
	ROCHESTER
	ROY
	SEATTLE
	SEQUIM

CONFIDENTIAL
Amended Exhibit 6

	SHELTON
	SILVERDALE
	SPOKANE
	SPRINGDALE
	SUMNER
	TACOMA
	TACOMA WAVERLY
	TOUCHET
	VANCOUVER
	WAITSBURG
	WALLA WALLA
	WARDEN
	WINLOCK
	YAKIMA
ST JOHN TELEPHONE CO.	
	ST JOHN
TENINO TELEPHONE CO.	
	BUCODA
	TENINO
TOLEDO TELEPHONE CO., INC.	
	TOLEDO
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	
	CHIMACUM-CENTER
	COLUMBIA
	DALLESPORT
	GLENWOOD
	GOLDENDALE
	GRANDVIEW
	GRANGER
	HARRAH
	HOOD CANAL
	KLICKITAT
	LYLE
	MABTON-BICKLETON
	MATTAWA
	PATERSON
	PORT ANGELES-GARDINER
	POULSBO
	PROSSER
	ROOSEVELT
	STEVENSON
	SUNNYSIDE
	TOPPENISH
	TROUT LAKE
	WAPATO
	WHITE SALMON
	WHITE SWAN

CONFIDENTIAL
Amended Exhibit 6

	WHITSTRAN
	WILLARD
WESTERN WAHKIAKUM COUNTY TELEPHONE CO.	
	GRAYS RIVER
	NASELLE
WHIDBEY TELEPHONE CO.	
	POINT ROBERTS
	SOUTH WHIDBEY
YCOM NETWORKS, INC.	
	RAINIER
	YELM

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon all parties of record in this proceeding, listed below, by mail, properly addressed with FedEx postage prepaid, in accordance with the requirements of WAC 480-07-150.

Dated this 20th of February, 2014.



Amy Inagaki

Total Call Mobile, Inc.

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250