

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Consumer Programs Branch**

**RESOLUTION T-17787  
May 18, 2023**

**R E S O L U T I O N**

**Resolution T- 17787– Rescission of the Communications Division’s Conditional Acceptance of Boomerang Wireless LLC’s Advice Letter 49 and Denial of Boomerang’s Appeal.**

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**SUMMARY**

This Resolution rescinds the Communications Division’s (CD) conditional acceptance of Advice Letter (AL) 49, submitted by Boomerang Wireless LLC, doing business as enTouch Wireless, (U-4436-C) (Boomerang) on April 21, 2021. In AL 49, Boomerang sought approval to offer certain federally-subsidized Emergency Broadband Benefit (EBB) plans to its California LifeLine customers. CD conditionally accepted AL 49 on May 11<sup>th</sup>, effective May 12, 2021, in time for the national launch of the EBB program. Staff notified Boomerang, and other California LifeLine service providers, that CD’s acceptance of the ALs was conditional on the federal Universal Service Administrative Company’s (USAC) approval of the EBB plans. USAC never approved Boomerang’s proposed EBB plans in AL 49. Therefore, AL 49 is invalid.<sup>1</sup>

This Resolution also denies Boomerang’s appeal, submitted to CD Director on August 30, 2021. Boomerang requests \$688,701.14 in California LifeLine subsidies<sup>2</sup> for the unapproved EBB plans described in AL 49, which staff properly denied. General Order (GO) 153 authorizes staff to reject claims for services that are not approved. Since USAC did not approve the proposed EBB plans in AL 49, the plans are ineligible for reimbursement. We affirm CD’s disallowance of \$688,701.14 from Boomerang’s July 2021 California LifeLine reimbursement claim.<sup>3</sup>

Boomerang also requests that CD modify the effective date of AL 50. Between June 25, 2021 to August 12, 2021, Boomerang revised its proposed EBB plans in AL50/50-A/50-B. Since the

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<sup>1</sup>On December 2, 2021, the Commission, in Resolution T-17757, rescinded staff’s conditional acceptance of Truconnect Communications, Inc’s (Truconnect) proposed EBB plans contained in AL 38. Much like Boomerang, Truconnect sought approval to offer EBB plans to its California LifeLine customers. CD accepted AL 38 conditioned on USAC’s approval of Truconnect’s EBB plans. Because Truconnect did not submit evidence that USAC had approved its plans, the Commission rescinded CD’s conditional acceptance of AL 38. Truconnect appealed Resolution T-17757. The Commission, in Decision (D.) 22-02-028, denied Truconnect’s appeal and affirmed CD’s rescissions of AL 38. On March 24, 2022, Truconnect filed a petition for a writ of review of Commission D. 22-02-028 and Resolution T-17757 with the Court of Appeal, Second District, Appellate Two. The Court denied Truconnect’s petition. (Case No. B319247, Order, filed July 1, 2022).

<sup>2</sup> Boomerang submitted a reimbursement claim for \$1,858,108.31 for July 2021, of which CD approved \$1,169,408.17 and denied \$688,701.154. The denied portion represents ineligible, unapproved EBB plans described in AL 49.

<sup>3</sup> In Resolution T-17757 and D.22-02-028, we similarly affirmed staff’s rejection of a carrier’s subsidy claims for reimbursement of EBB/LifeLine plans that were never approved by USAC. The facts are substantially similar here.

proposed EBB plans described in AL 49 were not permitted to be offered because they were never approved by USAC, it was necessary and reasonable for staff to make AL 50/50-A/50-B effective immediately so that Boomerang could legally offer EBB services to California LifeLine customers. Therefore, CD's acceptance of AL 50/50-A/50-B on August 19, 2021, with the effective date of July 1, 2021, is valid.

## **BACKGROUND**

On February 25, 2021, the Federal Communications Commission (FCC) established the EBB program—a temporary public assistance program Congress authorized in the Consolidated Appropriations Act of 2021—to ensure low-income families had access to affordable broadband for telework, virtual learning, and telehealth during the COVID-19 pandemic.<sup>4</sup> Congress authorized the FCC to spend up to \$3.2 billion providing discounts of up to \$50 per month for broadband services for eligible consumers (or \$75 per month for consumers living on qualifying Tribal lands), as well as a one-time discount of up to \$100 for the purchase of a desktop computer, laptop, or tablet.<sup>5</sup> Any person eligible for national Lifeline was deemed eligible for EBB. The program was launched on May 12, 2021, and expired on December 31, 2021.

Under the EBB rules, providers interested in participating in the EBB program were required to file their proposed EBB plans with USAC for approval. They were required to provide, among other things: 1) a description of the broadband services that the provider planned to offer for EBB reimbursement; and 2) documentation demonstrating the standard rates for the broadband services.<sup>6</sup> Participating providers were only eligible to receive EBB reimbursements for broadband offerings that they offered as of December 1, 2020, on the *same terms* and in the *same manner*.<sup>7</sup> Providers were barred from increasing the prices of the broadband offerings.<sup>8</sup> The FCC held that “[w]e believe the December 1, 2020 restriction is best understood as a method of avoiding arbitrage opportunities and waste in the Program by allowing unscrupulous providers to take advantage of the increased subsidy available” and preventing “participating providers from increasing prices above the usual market rate for their services for the purpose of claiming the maximum reimbursement amount.”<sup>9</sup>

In order to meet the EBB launch date, CD Director Robert Osborn issued an administrative letter on April 19, 2021, inviting providers to file advice letters if they wanted to offer the EBB plans and seek reimbursement from the California LifeLine program. Staff also informed the providers about the FCC's EBB order, which stated that only broadband plans approved by USAC were reimbursable from the EBB program.

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<sup>4</sup> *In the Matter of Emergency Broadband Benefit Program, Report and Order, WC Docket No. 20-445* (FCC 21-29), adopted Feb 25, 2021. (EBB Order)

<sup>5</sup> <https://www.fcc.gov/broadbandbenefit>.

<sup>6</sup> EBB Order, para. 21.

<sup>7</sup> Consolidated Appropriations Act, div. N, tit. IX, § 904(a)(9).

<sup>8</sup> EBB Order, para. 72. Additionally, the EBB Order required that participating providers certify under penalty of perjury that the information set forth in the election notice was true, accurate and complete and that they understood and would comply with all statutory and regulations described within the EBB Order.

<sup>9</sup> *Ibid.*

On April 21, 2021 Boomerang submitted AL 49 to CD for review, which included four proposed LifeLine/EBB service plans that offered unlimited talk, unlimited text, and metered data:

- \$224/\$259 EBB w/ 1100 Unit Plan
- \$275 EBB w/ Basic Plus Plan
- \$290 EBB with Standard Plan
- \$290 with California LifeLine Tribal Plan<sup>10</sup>

TruConnect, Telrite, and Tracfone also submitted advice letters of their proposed EBB service offerings. Because the EBB program was a temporary program with limited funds, CD recognized the need to move quickly in order to maximize the federal benefits available to low-income Californians, and conditionally approved all four advice letters on May 11th, in time for the May 12, 2021 national launch of EBB. In meetings with the stakeholder working groups, staff cautioned service providers that details of EBB's interaction with the California LifeLine program were still being finalized, interpreted, and implemented, and that the conditional acceptance of the advice letters could be reconsidered and further actions taken, as necessary.

On April 27, 2021, and on May 11, 2021, staff convened stakeholder working group meetings, which included Boomerang. At these two meetings, staff informed providers that all LifeLine/EBB plans submitted for review by CD must be approved by USAC. Staff also informed stakeholders that they were not permitted to add the price of a California LifeLine plan on top of the price of a USAC-approved EBB plan. Additionally, at the May 11, 2021 stakeholder working group meeting, staff informed providers that staff were expediting the advice letter review prior to the conclusion of the 20-day protest period with the understanding that staff could resolve any valid protests, prior to reimbursing claims.

On June 22, 2021, CD Director Robert Osborn issued a second administrative letter to providers, reiterating and clarifying that the price of LifeLine/EBB plans submitted to California LifeLine may not exceed the price approved by USAC, and that providers must revise the advice letters with documentation of USAC approval of EBB plans. Staff informed the providers that LifeLine customers must be on either an existing California Lifeline service plan or a California Lifeline EBB approved plan.<sup>11</sup>

On June 25, 2021, Boomerang submitted its advice letter, AL 50, which still included plans that were not USAC-approved.<sup>12</sup> On June 28, 2021, Boomerang submitted a revised AL 50-A, which still did not match the USAC-approved \$50 plan. Staff emailed Boomerang on June 30, July 6, and

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<sup>10</sup> To the extent Boomerang claims AL 49 plan information to be confidential, it is hereby denied. The same plans were included in AL 50, which were not marked confidential. Additionally, AL 50 was made publicly available and served on the AL service list with the plan details. Furthermore, pursuant to GO 153, Section 9.6.1, providers' LifeLine claim forms are available to the public. The plans listed in AL 49 were offered to the public and Boomerang sought reimbursement from the LifeLine fund based on those plans, thus the prices and details of the plans are not confidential. Therefore, any confidentiality claim to AL 49 has been waived, and we deem the plan details in AL 49 to be non-confidential.

<sup>11</sup> <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/lifeline/notices-for-carriers/admin-letters/lifelineebb-adviceletter-filings62221.pdf>

<sup>12</sup> AL 50 contains all four plans described in AL 49 and an additional plan priced at \$215.

July 19, 2021 informing Boomerang that it needed to submit another supplement to AL 50/50-A to correct the error. Staff also informed Boomerang that AL 49 was invalid as of July 1, 2021, and that the Lifeline customers must be on an approved EBB LifeLine plan.<sup>13</sup>

On August 12, 2021 Boomerang filed supplemental AL 50-B, which finally included the only plan—a \$50 plan—that USAC approved. On August 19, 2021, CD staff approved Boomerang’s revised AL50/50-A/50-B, effective July 1, 2021, so that Boomerang could legally offer EBB/LifeLine services to its customers.

On August 30, 2021, Boomerang submitted a three-part request for appeal to CD Director Robert Osborn: 1) to request \$688,701.14 in California LifeLine subsidies for the unapproved EBB plans in AL 49 for July 2021; 2) to clarify that AL 49 was effective from May 12, 2021 through August 19, 2021; and 3) to modify the effective date of AL 50 from July 1<sup>st</sup> to August 19, 2021. These requests are denied for the reasons set forth below.

## **DISCUSSION**

The Commission sets the rates and charges for Lifeline service, and determines the eligibility requirements for the California LifeLine subsidy.<sup>14</sup> Under GO 153, unapproved LifeLine plans are prohibited and are not reimbursable. The purpose of the California LifeLine program is to provide access to high quality, affordable communications services to low income households.<sup>15</sup>

In 2021, the FCC launched the EBB program to provide an additional federal subsidy, on an emergency basis, to assist low-income consumers across the country who had been affected by the COVID-19 pandemic. California LifeLine service providers who elected to participate in the EBB program and desired to offer EBB plans as part of their authorized California LifeLine plans, regardless of whether they were seeking the California LifeLine subsidy, were required to file either a Tier 1 advice letter (for wireline providers) or a Tier 2 advice letter (for wireless providers) in accordance with GO 96B and 153.<sup>16</sup> As described above, staff informed prospective service providers that EBB/LifeLine service offerings had to be approved by USAC, and that the California plans must be at the same price as the USAC-approved plans.

Boomerang submitted AL 49 with its proposed EBB plans, and CD appropriately expedited the approval of AL 49 in order to more quickly provide financial assistance to low-income Californians. We affirm CD staff’s placement of conditions on such approval, in order to provide time for CD staff to verify the proposed EBB plans with USAC.

CD learned from USAC that it did not approve any of the costlier EBB plans (\$224-\$290) included in AL 49 and that it had approved only one plan, a \$50 plan, which was not included in AL 49. The

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<sup>13</sup> To show good faith, CD paid claims for Boomerang’s unapproved EBB plans offered in May and June of 2021 while CD was determining which plans had been approved by USAC. Pursuant to GO 153, CD reserves the right to take actions to recover the subsidy payments that were received in violation of the California LifeLine program rules.

<sup>14</sup> Public Utilities Code section 873.

<sup>15</sup> *Id.*

<sup>16</sup> See June 22, 2021, letter CD Director Robert Osborn to LifeLine providers.

\$50 plan offered 20 GB data, and unlimited talk and text. Since the \$50 plan was fully subsidized by the EBB program, after the application of the EBB subsidy of \$50 (and \$75 subsidy for tribal customers), the public interest was sufficiently served by having this EBB plan available to Boomerang's qualifying low-income California LifeLine subscribers. Reimbursing Boomerang additionally places an unnecessary burden on the California LifeLine Fund, from which Boomerang seeks an extra \$14.85 subsidy per each subscriber who is already receiving unlimited calling, texting, and data.

Therefore, we affirm CD's decision to withhold payment of subsidies (\$688,701.14) to Boomerang for the unapproved EBB plans included in AL 49. Boomerang was not authorized to offer EBB plans to California LifeLine subscribers that had not been approved by USAC and by the Commission. Under GO 153, staff may require providers to submit workpapers, documents and other information to substantiate their California LifeLine claims,<sup>17</sup> and the providers must submit the requested information within 10 business days.<sup>18</sup> GO 153 authorizes staff to reject claims that are submitted without proper workpapers or documentation. Boomerang failed to provide documentation of USAC approval of the costlier plans described in AL 49, despite repeated requests from CD staff, and in fact USAC never approved the costlier plans. Thus, we find that staff's rejection of AL 49 was appropriate, and we affirm that decision.

In Boomerang's appeal of CD's determination, Boomerang makes three requests, which are denied. First, Boomerang requests that CD overturn staff's disallowance of \$688,701.14 in California LifeLine subsidies for July 2021, for the unapproved EBB/LifeLine plans in AL 49. This request is denied. In response to Boomerang's argument that the Commission did not inform Boomerang about the disallowance until September 28, 2021: CD told all service providers, including Boomerang, that only USAC-approved plans would be reimbursed. Boomerang had the necessary information to know that its July reimbursement claim would not be approved. Specifically, Boomerang based the reimbursement on plans in AL 49, which CD had only conditionally accepted to be effective from May 12 to June 2021 as indicated through several meetings, in the June 22 Administrative Letter, and in the aforementioned email correspondence. The plans were not in compliance with program requirements that plans must be approved by USAC.

Second, Boomerang requests that CD clarify that AL 49 was effective from May 12, 2021 through August 19, 2021. This request is denied because AL 49 was conditionally accepted from May 12 to June 2021, subject to later submission of documentation showing USAC approval. Boomerang never provided the documentation of USAC approval, therefore Boomerang never met the conditions placed on staff's provisional acceptance of AL 49, and that advice letter never became effective. Additionally, the AL 49 plans did not comply with the June 22 administrative letter.

Third, Boomerang requests that CD modify the effective date of AL 50 from July 1st to August 19th. This request is denied because it was necessary for AL 50/50-A/50-B to be deemed effective immediately so that Boomerang could legally offer EBB/Lifeline service to California LifeLine customers. Despite multiple communications from CD that eligible plans must be approved by USAC, Boomerang did not file its USAC-approved plan—a \$50 plan—until August 12, 2021, in

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<sup>17</sup> GO 153, Section 9.11.2.

<sup>18</sup> GO 153, Section 9.11.3.

AL 50-B. It is incumbent upon participating service providers to follow LifeLine program requirements.

Additionally, the Commission has delegated authority to staff to review and process advice letters. In Decision 14-10-036, the Commission authorized LifeLine staff “to revise administrative procedures pursuant to the direction provided in this Decision to help ensure efficient operation of the California LifeLine Program and address any California Lifeline Program irregularities or other issues.”<sup>19</sup> Furthermore, the Commission directed service providers to “follow the direction of the Commission and its staff with respect the administration, adjudication, and oversight of the California Lifeline Program and timely respond to all request for information and data.”<sup>20</sup> Staff’s approval of AL 50/50-A/50-B, with the effective date of July 1, 2021, was well within its delegated authority to administer the California Lifeline Program, which includes reviewing advice letters to determine whether proposed service plans meet the program requirements.

Finally, even if the effective date for AL 50 were modified to August 19, 2021, Boomerang would not be entitled to recover any California LifeLine subsidies for the proposed EBB plans contained in AL 49 because the acceptance of AL 49 was conditioned on providing documentation to the Commission of USAC’s approval, which Boomerang failed to provide (because Boomerang never in fact obtained USAC approval for the costlier plans in AL 49). Therefore, Boomerang’s reimbursement claim for \$688,701.14, which was based on its unapproved EBB plans in AL 49, was impermissible, and is ineligible for recovery.

## **PARTIES’ COMMENTS**

In compliance with Public Utility Code § 311(g), the Commission emailed a Notice of Availability on March 28, 2023 informing all parties on the general service list of the availability of this Resolution for public comments at the Commission’s website [www.cpuc.ca.gov](http://www.cpuc.ca.gov). The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available at this same website.

## **FINDINGS AND CONCLUSIONS**

1. On April 19, 2021, staff invited service providers to file advice letters if they wanted to offer the EBB plans and seek reimbursement from the California LifeLine program, and informed them about the EBB order, which required USAC approval of the EBB plans.
2. On April 21, 2021, Boomerang filed Advice Letter 49 requesting approval of four EBB plans for amounts that exceeded the price of the plans authorized by USAC.

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<sup>19</sup> D.14-10-036, OP 28; see also D. 10-11-033, OP 36.

<sup>20</sup> D.14-10-036, OP 27; see also D. 10-11-033, OP 43.

3. On April 27 and May 11, 2021, in stakeholder working group meetings, CD informed the prospective EBB providers that all California LifeLine/EBB plans submitted for CD review must be approved by USAC.
4. On May 11, 2021, staff conditionally accepted Advice Letter 49 in time for the nationwide launch of the EBB on May 12, 2021.
5. On May 17, 2021, staff learned that USAC approved only one EBB plan, a \$50 plan, for Boomerang, which did not match any of the plans in Advice Letter 49.
6. USAC did not approve any of the EBB plans described in Boomerang's Advice Letter 49.
7. On June 22, 2021, CD Director Robert Osborn issued an administrative letter to prospective EBB providers informing them that service providers may only offer EBB service offerings that have been approved by USAC, and EBB service offerings must be at the same prices as approved by USAC.
8. On June 25, 2021, Boomerang filed Advice Letter 50, which revised Advice Letter 49.
9. On June 28, 2021, Boomerang filed Advice Letter 50-A.
10. On June 30, 2021, staff informed Boomerang that the plans in Advice Letter 49 exceeded the price of the plans authorized by USAC, that LifeLine subsidies for unapproved EBB plans would be denied, and that Boomerang needed to submit supplemental documents because Advice Letter 50/50-A did not include an approved USAC plan.
11. On July 6, July 19, and August 12, 2021, staff informed Boomerang that Boomerang's Advice Letter 50/50-A did not include the approved USAC plan.
12. On August 12, 2021, Boomerang filed Advice Letter 50-B, which included one plan, a \$50 plan, that USAC approved.
13. On August 19, 2021, staff approved Advice Letter 50/50-A/50-B, effective July 1, 2021.
14. On August 30, 2021, Boomerang submitted a letter of appeal to Director Robert Osborn to request \$688,701.14 in California LifeLine subsidies for the unapproved EBB plans contained in AL 49, to clarify that Advice Letter 49 was effective from May 11, 2021 through August 19, 2021, and to modify the effective date of AL 50 from July 1st to August 19th.
15. Boomerang's Advice Letter 49 does not comply with the program rules of California LifeLine because the prices of the EBB plans contained AL 49 exceed the amount approved by USAC.

16. Boomerang failed to provide documentation of USAC approval of the EBB plans in Advice Letter 49.
17. It is reasonable to rescind Boomerang's conditional acceptance of Advice Letter 49 because Boomerang did not submit documentation of USAC approval for the EBB plans described in Advice Letter 49.
18. General Order 153 directs staff to deny reimbursement claims without proper supporting documentation or workpapers.
19. It is reasonable to deny Boomerang's appeal.

**THEREFORE, IT IS ORDERED that:**

1. Boomerang Wireless LLC's, doing business as enTouch Wireless, Advice Letter 49, submitted on April 21, 2021, and conditionally accepted on May 11, 2021, is rescinded.
2. Effective July 1, 2021, requests for subsidies from the California LifeLine fund by Boomerang related to Emergency Broadband Benefit plans that have not been approved by the Universal Service Administrative Company, or in an amount that exceeds the amount approved by the Universal Service Administrative Company, including the Emergency Broadband Benefit plans contained in Advice Letter 49, shall be denied.
3. The Communications Division's disallowance of \$688,701.14 from Boomerang's reimbursement claim for July 2021 from the California LifeLine Fund is affirmed.
4. Boomerang's appeal submitted to Director Osborn on August 30, 2021, shall be denied.

This Resolution is effective today.

I certify that the foregoing Resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on \_\_\_\_\_, the following Commissioners voting favorable thereon:

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Rachel Peterson  
Executive Director



**Attachment A: Boomerang's Advice Letter (AL) 49 and USAC Plans**

GOODIN,  
MACBRIDE,  
SQUERI & DAY, LLP

John L. Clark, Attorney at Law

April 20, 2021

Attn: PAL Coordinator  
Communications Division  
Public Utilities Commission  
Third Floor  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Advice Letter No. 49 of Boomerang Wireless, LLC d/b/a enTouch Wireless (U-4436-C)**

Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang" or the "Company") hereby submits its Advice Letter No. 49.

By this advice letter, the Company is notifying the Commission of its election to participate in the Federal Communications Commission's Emergency Broadband Benefit ("EBB") program.

The Company will offer EBB program benefits to eligible California LifeLine customers<sup>1</sup> in conjunction with each of its existing California LifeLine plans. Customers will continue to receive service under the same rates, terms, and conditions that apply to their chosen plan, but will have the option to also receive EBB program benefits as specified in the EBB Plan Description, attached as Confidential Exhibit A,<sup>2</sup> during the term of the EBB program.

The Company has attached, in Confidential Exhibit B, draft advertising materials, and a draft EBB Program landing webpage, through which complete information will be available to new and existing customers regarding the EBB program, including: a description of the EBB program offering, its duration, and all terms and conditions, and other requirements that apply to the EBB program, as well as the California LifeLine program.<sup>3</sup>

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<sup>1</sup> EBB program benefits are available only to customers who meet applicable federal eligibility requirements. Therefore, California LifeLine customers who are not eligible for federal Lifeline benefits will not be eligible to receive service under the Company's EBB plans.

<sup>2</sup> A Declaration of Confidentiality is attached.

<sup>3</sup> When published to the Company's website, the landing page will include links to appropriate documentation, such as the Company's standard terms and conditions, acceptable use policy, and EBB and California LifeLine eligibility requirements.

Attn: PAL Coordinator  
April 20, 2021  
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The EBB Plan Description shows, for each plan, how EBB, federal Lifeline, and California LifeLine support, along with any Company-funded discounts, are applied to each plan. During the term of the EBB program, California LifeLine customers will remain on California LifeLine and, upon expiration of the EBB benefit, will continue to receive service under the associated California LifeLine plan.

The Company provides its services to California LifeLine customers on a prepaid basis and, with the application of specified support and Company-funded discounts, will not bill customers for any EBB Plan charges. Therefore, the requirement to submit a sample invoice does not apply. However, as noted above, the EBB Plan Description demonstrates, for each plan, how support and Company-funded discounts are applied.

A copy of this advice letter, excluding Confidential Exhibit A and Confidential Exhibit B, is being served on all persons who have requested to be regularly served with the Company's advice letters as shown on the advice letter service list published on the Commission's website. In addition, a copy is being submitted to [CaLLAdviceLetter@cpuc.ca.gov](mailto:CaLLAdviceLetter@cpuc.ca.gov)

Anyone may object to this advice letter by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Ave., San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. If you have e-mail capability, you must also e-mail a copy to the Telecommunications Division at [TD\\_PAL@cpuc.ca.gov](mailto:TD_PAL@cpuc.ca.gov).

On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to:

Ms. Julia Redman Carter  
Boomerang Wireless, LLC d/b/a enTouch  
Wireless  
955 Kacena Road, Suite A  
Hiawatha, Iowa 52233  
Email: [jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)

John L. Clark  
Goodin, MacBride, Squeri, & Day, LLP  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Fax: 415-398-4321  
Email: [jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)

To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site ([www.cpsc.ca.gov](http://www.cpsc.ca.gov)) and look for document links to General Order 96-B.

Attn: PAL Coordinator  
April 20, 2021  
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If there are any questions regarding this filing, please contact the undersigned.  
Thank you for your assistance in this matter.

Very truly yours,

*/s/ John L. Clark*

John L. Clark

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**EXHIBIT A (CONFIDENTIAL)**

**EBB PLAN DESCRIPTION**

**(Plans Are Available Only for the Duration of the FCC EBB Program)**

<b>Plan</b>	<b>Plan, with EBB, Includes</b>	<b>Regular Plan Charge</b>	<b>Lifeline Plan Charge</b>	<b>California LifeLine Eligible</b>
EBB w/ 1100 Unit Plan**	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$224.00/ \$259.00††	\$0.00*	Not eligible
EBB w/ Basic Plan****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$275.00	\$0.00*	Eligible
EBB w/ Standard Plan ****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible
EBB w/ California LifeLine Tribal Plan****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible***

\* Reflects plan charge after application of EBB subsidy in the amount of \$50.00, California LifeLine subsidy of \$12.85 in the case of the EBB w/ Basic Plan or \$14.85 in the case of other plans (excluding EBB w/ 1100 Unit Plan, which is not eligible for California LifeLine subsidy), a federal Lifeline subsidy of \$5.25 in the case of the EBB w/ 1100 Unit Plan or \$9.25 in the case of other plans, and Company-funded subsidy of \$168.75/\$203.75 (with smartphone) in the case of the

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EBB w/ 1100 Unit Plan, \$202.90 in the case of the EBB w/ Basic Plan, \$275.00 in the case of the EBB w/ Standard Plan, or \$290.00 in the case of the EBB w/ Tribal Plan. The EBB w/ Tribal Plan also reflects additional federal enhanced Lifeline subsidy of \$25.00.

\*\* The EBB w/ 1100 Unit Plan will remain in place through the term of the EBB program or November 30, 2021, whichever is earlier. The plan will remain in place only for Boomerang customers who are already receiving service under the Company's associated non-EBB 1100 Unit Plan and for existing Boomerang voice/data plan customers whose phones do not meet the FCC-mandated data speeds..

\*\*\*Tribal plan is only available to qualified residents of Tribal lands in federally-recognized Tribal areas where the Company is eligible to receive federal "Enhanced Lifeline" support and for which the Company has received authorization from the Tribal authority.

\*\*\*\* Plan includes handset. Customer may, instead, use the customer's own handset for one-time "Bring-Your-Own Device ("BYOD") fee of \$15. This fee includes SIM card.

\*\*\*\*\*Acceptable Use Policy Applies. For personal use only. See Terms and Conditions for more information.

†† Includes smartphone handset for existing customers to non-EBB 1100 Unit Plan who do not have smartphone.

††† Initial monthly data allowance is 20GB for EBB w/ Basic Plan, 24.5GB for EBB w/ Basic Plan, and 26GB for EBB w/ Standard Plan and EBB w/ California LifeLine Tribal Plan; if customer uses up the allowance, the customer must contact the Company to receive, at no cost, additional data.

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FEATURES AVAILABLE TO EBB PLANS			
Service/Feature Name	Service/Feature Definition	California LifeLine Service / Feature Rate and Charge	Service/Feature Restrictions
<b>Initial Phone Activation Fee*</b>	A charge levied when a customer initially commences California LifeLine service.* Not applied for phone upgrades or replacements.	\$39.00*	Each plan is subject to a one-time \$39.00 activation or service conversion charge levied when a customer initially commences service. However, if the customer is approved for California LifeLine, the California LifeLine participant will be eligible for a waiver funded by the California LifeLine program or by the Company.*
<b>Restocking Fee</b>	A charge levied when a party returns an item to a service provider to offset the cost of accepting the returned item.	\$0.00	None
<b>Call Waiting</b>	A feature that alerts you to an incoming call while you're on a call and allows you to switch between the two calls.	\$0.00	None
<b>Call Forwarding</b>	A feature whereby all calls to your mobile phone number redirect automatically to another number that you designate.	\$0.00	None
<b>Caller ID</b>	A feature that provides incoming caller identifying information, to include the caller phone number, and when available the name associated with the calling phone number to your handset.	\$0.00	None

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FEATURES AVAILABLE TO EBB PLANS			
Service/Feature Name	Service/Feature Definition	California LifeLine Service / Feature Rate and Charge	Service/Feature Restrictions
<b>3-Way Calling</b>	A feature that allows you to add a second outgoing call to an already connected call.	\$0.00	None.
<b>Voicemail</b>	A feature that lets a caller leave a message or access other available options if a line is busy or not answered.	\$0.00	None
<b>Toll Blocking</b>	A feature to limit toll spending thresholds on plans that are not unlimited.	\$0.00	None
<b>International Long Distance (ILD) Blocking</b>	A feature where outbound calls are blocked to international destinations.	N/A	Note: Boomerang does not offer ILD.
<b>900 / 976 Call Block</b>	A feature where outbound calls are blocked to 900 and 976 numbers.	\$0.00	None
<b>Local Calls</b>	Any call, text message or other connection made to a location in your local calling area.	\$0.00	None

CONFIDENTIAL

FEATURES AVAILABLE TO EBB PLANS			
Service/Feature Name	Service/Feature Definition	California LifeLine Service / Feature Rate and Charge	Service/Feature Restrictions
Long Distance	Any call, text message or other connection made to a location outside your local calling area.	\$0.00	None
211 – Information and referral service	Information and referral service.	\$0.00	None
311 - Government Information	Non-emergency government service information.	\$0.00	None
411 - Directory Services	411 gives you access to telephone numbers and addresses of business, government, and residential listings.	\$0.00	None
511 - Transportation Information	Non-emergency government service information.	\$0.00	None
611 - Customer and Repair Service	Customer service and repair information.	\$0.00	None
711 - TRS Relay Access	FCC adopted use of the 711 dialing code for access to Telecommunications Relay Services (TRS).	\$0.00	None
811 - Call Before You Dig (CBUD) Information	CBUD information to protect pipes.	\$0.00	None
911 - Emergency Services	Emergency call number based on location information available.	\$0.00	None

CONFIDENTIAL



FEATURES AVAILABLE TO EBB PLANS			
Service/Feature Name	Service/Feature Definition	California LifeLine Service / Feature Rate and Charge	Service/Feature Restrictions
<b>0 - Operator Services Live</b>	Live Operator	\$0.00	None
<b>0 - Operator Services Automated</b>	Automated Operator	\$0.00	None
<b>0 - Operator Services Person-to-Person</b>	Person-to-Person Operator Assisted	\$0.00	None
<b>Deaf / Disabled Service</b>	Second line available to deaf and disabled Lifeline Subscribers.	Based on plans selected	Note: Available to qualified deaf or disabled qualified Lifeline Subscribers.

\* The waiver funded by the California LifeLine program is available for no more than a total of two wireless service activations (whether with the Company or any other wireless service provider) per household during the period commencing on December 24 of each year and ending on December 23 of the following year and only applies: (i) when the California LifeLine participant establishes California LifeLine wireless telephone service for the first time; and (ii) when switching from one California LifeLine telephone service provider, whether wireline or wireless, to a California LifeLine wireless telephone service provider.

CONFIDENTIAL

**Attachment B: Boomerang's Advice Letter (AL) 50 and USAC Plans**

GOODIN,  
MACBRIDE,  
SQUERI & DAY, LLP

John L. Clark, Attorney at Law

June 25, 2021

Attn: PAL Coordinator  
Communications Division  
Public Utilities Commission  
Third Floor  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Advice Letter No. 50 of Boomerang Wireless, LLC d/b/a enTouch  
Wireless (U-4436-C)

Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang" or the  
"Company") hereby submits its Advice Letter No. 50.

By this advice letter, the Company is resubmitting its notification to the  
Commission of its election to participate in the Federal Communications Commission's  
Emergency Broadband Benefit ("EBB") program.

The Company is offering and will continue to offer EBB program benefits to  
eligible California LifeLine customers<sup>1</sup> in conjunction with each of its existing California  
LifeLine plans. Customers will continue to receive service under the same rates, terms, and  
conditions that apply to their chosen plan, but will have the option to also receive EBB program  
benefits on their California LifeLine device, as specified in the EBB Plan Description, attached  
as Exhibit A, during the term of the EBB program.

The EBB Plan Description shows, for each plan, how EBB, federal Lifeline, and  
California LifeLine support, along with any Company-funded discounts, are applied to each  
plan. During the term of the EBB program, California LifeLine customers will remain on  
California LifeLine and, upon expiration of the EBB benefit, will continue to receive service  
under the associated California LifeLine plan. The Company will notify customers of the  
termination of the EBB program at least thirty days prior to the end of the plan.

The Company has attached, as Exhibit B, its EBB Program landing webpage,  
through which complete information will be available to new and existing customers regarding

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<sup>1</sup> EBB program benefits are available only to customers who meet applicable federal eligibility requirements.  
Therefore, California LifeLine customers who are not eligible for federal Lifeline benefits will not be eligible to  
receive service under the Company's EBB plans.

Attn: PAL Coordinator  
June 25, 2021  
Page 2

the EBB program, including: a description of the EBB program offering, its duration, and all terms and conditions, and other requirements that apply to the EBB program, as well as the California LifeLine program.<sup>2</sup>

The Company provides its services to California LifeLine customers on a prepaid basis and, with the application of specified support and Company-funded discounts, will not bill customers for any EBB Plan charges. Therefore, the requirement to submit a sample invoice does not apply. However, as noted above, the EBB Plan Description demonstrates, for each plan, how support and Company-funded discounts are applied.

The Company also is providing, in Exhibit C, copies of materials demonstrating approval by USAC of the Company's participation in the EBB program.

Finally, the Company is providing, in Exhibit D, copies of its previously-submitted advertising material.

A copy of this advice letter is being served on all persons who have requested to be regularly served with the Company's advice letters as shown on the advice letter service list published on the Commission's website. In addition, a copy is being submitted to [CaLLAdviceLetter@cpuc.ca.gov](mailto:CaLLAdviceLetter@cpuc.ca.gov)

Anyone may object to this advice letter by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Ave., San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. If you have e-mail capability, you must also e-mail a copy to the Telecommunications Division at [TD\\_PAL@cpuc.ca.gov](mailto:TD_PAL@cpuc.ca.gov).

On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to:

Ms. Julia Redman Carter  
Boomerang Wireless, LLC d/b/a enTouch  
Wireless  
955 Kacena Road, Suite A  
Hiawatha, Iowa 52233  
Email: [jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)

John L. Clark  
Goodin, MacBride, Squeri, & Day, LLP  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Fax: 415-398-4321  
Email: [jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)

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<sup>2</sup> In addition to EBB program information, the landing page includes links to appropriate documentation, such as the Company's standard terms and conditions, acceptable use policy, and EBB and California LifeLine eligibility requirements.

Attn: PAL Coordinator  
June 25, 2021  
Page 3

To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)) and look for document links to General Order 96-B.

If there are any questions regarding this filing, please contact the undersigned.  
Thank you for your assistance in this matter.

Very truly yours,

*/s/ John L. Clark*

John L. Clark

3653/001/X227782.v1

# EBB PLAN DESCRIPTION

(Plans Are Available Only for the Duration of the FCC EBB Program.

The Company will provide a minimum of 30 days advance notice to customers prior to the expiration of the plans.)

Plan	Plan, with EBB, Includes	Regular Plan Charge	Lifeline Plan Charge	California LifeLine Eligible
EBB Plan (USAC Approved) ††††	Unlimited voice minutes and texts, plus unlimited data †††, †††† *****	\$ 215.00 ††††	N.A. ††††	Eligible ††††
EBB w/ 1100 Unit Plan**	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$224.00/ \$259.00††	\$0.00*	Not eligible
EBB w/ Basic Plus Plan****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$275.00	\$0.00*	Eligible
EBB w/ Standard Plan *****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible
EBB w/ California LifeLine Tribal Plan*****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible***

\* Reflects plan charge after application of EBB subsidy in the amount of \$50.00, California LifeLine subsidy of \$14.85 (excluding EBB w/ 1100 Unit Plan, which is not eligible for California LifeLine subsidy), a federal Lifeline subsidy of \$5.25 in the case of the EBB w/ 1100 Unit Plan or \$9.25 in the case of other plans, and Company-funded subsidy of \$168.75/\$203.75 (with smartphone) in the case of the EBB w/ 1100 Unit Plan, \$200.90 in the case of the EBB w/ Basic Plus Plan, \$275.00 in the case of the EBB w/ Standard Plan, or \$290.00 in the case of the EBB w/ Tribal Plan. The EBB w/ Tribal Plan also reflects additional federal enhanced Lifeline subsidy of \$25.00.

\*\* The EBB w/ 1100 Unit Plan will remain in place through the term of the EBB program or November 30, 2021, whichever is earlier. The plan will remain in place only for Boomerang customers who are already receiving service under the Company's associated non-EBB 1100 Unit Plan and for existing Boomerang voice/data plan customers whose phones may not meet the FCC-mandated data speeds..

\*\*\*Tribal plan is only available to qualified residents of Tribal lands in federally-recognized Tribal areas where the Company is eligible to receive federal "Enhanced Lifeline" support and for which the Company has received authorization from the Tribal authority.

\*\*\*\* Plan includes handset consistent with enTouch Policy. Customer may, instead, use the customer's own handset for one-time "Bring-Your-Own Device ("BYOD") fee of \$15. This fee includes SIM card.

\*\*\*\*\* Acceptable Use Policy Applies. For personal use only. See Terms and Conditions for more information.

†† Includes smartphone handset for existing customers to non-EBB 1100 Unit Plan who do not have smartphone.

††† Initial monthly data allowance is 20GB for EBB Plan (USAC Approved), EBB w/ Basic Plan, 24.5GB for EBB w/ Basic Plus Plan, and 26GB for EBB w/ Standard Plan and EBB w/ California LifeLine Tribal Plan; if customer uses up the allowance, the customer must contact the Company to receive, at no cost, additional data.

†††† EBB Plan (USAC Approved) is not a California LifeLine Offering, but is included here pursuant to California Administrative Letter (dated June 22, 2021). The federal benefit discounts are applied from this EBB Plan in the following order: EBB Plan Retail Value (\$215.00), less federal Lifeline (\$9.25), less federal Enhanced (Tribal) (\$25.00), less federal EBB (\$50.00), leaving a remaining non-reimbursed amount of \$115.90 funded by the Company. In the cases of the California LifeLine EBB plans, the same amounts, including the \$115.90 funded by the Company, are applied before the California LifeLine discounts, still leaving, in each case, non-reimbursed amounts funded by the Company.

**Attachment C: Boomerang's Advice Letter (AL) 50-A and USAC Plans**

---

GOODIN,  
MACBRIDE,  
SQUERI & DAY, LLP

John L. Clark, Attorney at Law

June 28, 2021

Attn: PAL Coordinator  
Communications Division  
Public Utilities Commission  
Third Floor  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Supplemental Advice Letter No. 50-A of Boomerang Wireless, LLC  
d/b/a enTouch Wireless (U-4436-C)**

Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang" or the  
"Company") hereby submits its supplemental Advice Letter No. 50-A.

The purpose of this supplemental filing is to correct an error in Exhibit A to the original advice letter, which describes the Company's plans under the Federal Communications Commission's Emergency Broadband Benefit ("EBB") program. Specifically, the descriptions of the manner in which the discounts are applied under the plans failed to note that a customer payment of \$50 was approved by USAC under the USAC approved plan, but is waived by the Company to customers of the California LifeLine EBB plans. In addition, certain pages in Exhibits A and B were misarranged. Attached are corrected versions of Exhibits A (in redline and clean copy) and B.

A copy of this supplemental advice letter is being served on all persons who have requested to be regularly served with the Company's advice letters as shown on the advice letter service list published on the Commission's website. In addition, a copy is being submitted to [CaLLAdviceLetter@cpuc.ca.gov](mailto:CaLLAdviceLetter@cpuc.ca.gov)

Anyone may object to this supplemental advice letter by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Ave., San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. If you have e-mail capability, you must also e-mail a copy to the Telecommunications Division at [TD\\_PAL@cpuc.ca.gov](mailto:TD_PAL@cpuc.ca.gov).

On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to:

T 415.392.7900 F 415.398.4321  
[www.goodinmacbride.com](http://www.goodinmacbride.com)  
505 Sansome Street, Suite 900 | San Francisco, CA 94111

Dwnr 415.765.8443  
E [jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)



Attn: PAL Coordinator  
June 28, 2021  
Page 2

Ms. Julia Redman Carter  
Boomerang Wireless, LLC d/b/a enTouch  
Wireless  
955 Kacena Road, Suite A  
Hiawatha, Iowa 52233  
Email: jrcarter@readywireless.com

John L. Clark  
Goodin, MacBride, Squeri, & Day, LLP  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Fax: 415-398-4321  
Email: jclark@goodinmacbride.com

To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)) and look for document links to General Order 96-B.

If there are any questions regarding this filing, please contact the undersigned.  
Thank you for your assistance in this matter.

Very truly yours,

*/s/ John L. Clark*

John L. Clark

3653/001/X227816.v1

**EXHIBIT A**

**EBB PLAN DESCRIPTION**

**(Plans Are Available Only for the Duration of the FCC EBB Program.**

The Company will provide a minimum of 30 days advance notice to customers prior to the expiration of the plans.)

Plan	Plan, with EBB, Includes	Regular Plan Charge	Lifeline Plan Charge	California LifeLine Eligible
EBB Plan (USAC Approved) ††††	Unlimited voice minutes and texts, plus unlimited data †††, †††† *****	\$ 215.00 ††††	N.A. ††††	N.A. ††††
EBB w/ 1100 Unit Plan**	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$224.00/ \$259.00††	\$0.00*	Not eligible
EBB w/ Basic Plus Plan****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$275.00	\$0.00*	Eligible
EBB w/ Standard Plan ****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible
EBB w/ California LifeLine Tribal Plan****	Unlimited voice minutes and texts, plus unlimited data ††† *****	\$290.00	\$0.00*	Eligible***

\* Reflects plan charge after application of EBB subsidy in the amount of \$50.00, California LifeLine subsidy of \$14.85 (excluding EBB w/ 1100 Unit Plan, which is not eligible for California LifeLine subsidy), a federal Lifeline subsidy of \$5.25 in the case of the EBB w/ 1100 Unit Plan or \$9.25 in the case of other plans, and Company-funded subsidy of \$168.75/\$203.75 (with smartphone) in the case of the EBB w/ 1100 Unit Plan, \$200.90 in the case of the EBB w/ Basic Plus Plan, \$275.00 in the case of the EBB w/ Standard Plan, or \$290.00 in the case of the EBB w/ Tribal Plan. The EBB w/ Tribal Plan also reflects additional federal enhanced Lifeline subsidy of \$25.00.

\*\* The EBB w/ 1100 Unit Plan will remain in place through the term of the EBB program or November 30, 2021, whichever is earlier. The plan will remain in place only for Boomerang customers who are already receiving service under the Company's associated non-EBB 1100 Unit Plan and for existing Boomerang voice/data plan customers whose phones may not meet the FCC-mandated data speeds..

\*\*\*Tribal plan is only available to qualified residents of Tribal lands in federally-recognized Tribal areas where the Company is eligible to receive federal "Enhanced Lifeline" support and for which the Company has received authorization from the Tribal authority.

\*\*\*\* Plan includes handset consistent with enTouch Policy. Customer may, instead, use the customer's own handset for one-time "Bring-Your-Own Device ("BYOD") fee of \$15. This fee includes SIM card.

\*\*\*\*\*Acceptable Use Policy Applies. For personal use only. See Terms and Conditions for more information.

†† Includes smartphone handset for existing customers to non-EBB 1100 Unit Plan who do not have smartphone.

††† Initial monthly data allowance is 20GB for EBB Plan (USAC Approved), EBB w/ Basic Plan, 24.5GB for EBB w/ Basic Plus Plan, and 26GB for EBB w/ Standard Plan and EBB w/ California LifeLine Tribal Plan; if customer uses up the allowance, the customer must contact the Company to receive, at no cost, additional data.

†††† EBB Plan (USAC Approved) is not a California LifeLine Offering, but is included here pursuant to California Administrative Letter (dated June 22, 2021). The federal benefit discounts are applied under this EBB Plan in the following order: EBB Plan Retail Value (\$215.00), less federal Lifeline (\$9.25), less federal Enhanced (Tribal) (\$25.00), less federal EBB (\$50.00), leaving a remaining non-reimbursed amount of \$115.90 funded by a \$50.00 charge to the Customer with the remainder funded by the Company. In the cases of the California LifeLine EBB plans, the same federal subsidies are applied before the California LifeLine discounts, leaving non-reimbursed amounts entirely funded by the Company with no charge to the Customer.



**Attachment D: Boomerang's Advice Letter (AL) 50-B and USAC Plans**

GOODIN,  
MACBRIDE,  
SQUERI & DAY, LLP

John L. Clark, Attorney at Law

August 12, 2021

Attn: PAL Coordinator  
Communications Division  
Public Utilities Commission  
Third Floor  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Supplemental Advice Letter No. 50-B of Boomerang Wireless, LLC  
d/b/a enTouch Wireless (U-4436-C)

Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang" or the  
"Company") hereby submits its supplemental Advice Letter No. 50-B.

The purpose of this supplemental filing is to revise previously submitted information regarding the Company's plan under the Federal Communications Commission's Emergency Broadband Benefit ("EBB") program and the application of available or potential discounts. As shown on the attached Exhibit A, the Company is offering only a single plan, which has a monthly charge of \$50.00, as approved by USAC. This plan provides unlimited voice and texting plus 20GB of data. In addition to the EBB plan data allowance, Boomerang is providing unlimited data once the subscriber has exhausted the 20GB under the EBB plan. The courtesy "unlimited data" is available to EBB subscribers who call customer service for the courtesy data. This courtesy is not part of the EBB program or the California LifeLine program, but is a separate limited time option by the Company.

The discounts for LifeLine subscribers with EBB on the same device are subtracted from the EBB \$50.00 rate until the \$50.00 is exhausted, in the following order: federal Lifeline (\$5.25 for voice Minimum Service Standard ("MSS") plan or \$9.25 for broadband MSS plan), EBB Program subsidy (\$50.00), then California LifeLine subsidy (\$14.85 for 6G broadband),

USAC Rate -		Fed MSS -	EBB Program -	CA SSA:
\$50 -	Discounts:	\$5.25 or \$9.25 -	\$50 -	\$14.85
	Remaining Amt:	\$44.75 or \$40.75	\$0.00	\$0.00

A copy of this supplemental advice letter is being served on all persons who have requested to be regularly served with the Company's advice letters as shown on the advice letter

T 415.392.7900 F 415.398.4321  
www.goodinmacbride.com  
505 Sansome Street, Suite 900 | San Francisco, CA 94111

Direct 415.765.8443  
E jclark@goodinmacbride.com

Attn: PAL Coordinator  
August 12, 2021  
Page 2

service list published on the Commission's website. In addition, a copy is being submitted to [CaLLAdviceLetter@cpuc.ca.gov](mailto:CaLLAdviceLetter@cpuc.ca.gov)

Anyone may object to this supplemental advice letter by sending a written protest to: Telecommunications Advice Letter Coordinator, Communications Division, 505 Van Ness Ave., San Francisco, CA 94102-3298. The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. If you have e-mail capability, you must also e-mail a copy to the Telecommunications Division at [TD\\_PAL@cpuc.ca.gov](mailto:TD_PAL@cpuc.ca.gov).

On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to:

Ms. Julia Redman Carter  
Boomerang Wireless, LLC d/b/a enTouch  
Wireless  
955 Kacena Road, Suite A  
Hiawatha, Iowa 52233  
Email: [jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)

John L. Clark  
Goodin, MacBride, Squeri, & Day, LLP  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Fax: 415-398-4321  
Email: [jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)

To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site ([www.cpsc.ca.gov](http://www.cpsc.ca.gov)) and look for document links to General Order 96-B.

If there are any questions regarding this filing, please contact the undersigned.  
Thank you for your assistance in this matter.

Very truly yours,

*/s/ John L. Clark*

John L. Clark

**EXHIBIT A**

**EBB PLAN DESCRIPTION**

**(Plans Are Available Only for the Duration of the FCC EBB Program.**

The Company will provide a minimum of 30 days advance notice to customers prior to the expiration of the plans.)

Plan	Plan, with EBB, Includes	Regular Plan Charge	Lifeline Plan Charge	California LifeLine Eligible
EBB Plan (USAC Approved)	Unlimited voice minutes and texts, plus unlimited data <sup>1, 2, 3</sup>	\$50.00	\$0.00 <sup>4</sup>	Eligible <sup>5</sup>

<sup>1</sup> Plan includes handset consistent with enTouch Policy. Customer may, instead, use the customer's own handset for one-time "Bring-Your-Own Device ("BYOD") fee of \$15. This fee includes SIM card.

<sup>2</sup>Acceptable Use Policy Applies. For personal use only. See Terms and Conditions for more information.

<sup>3</sup> Monthly data allowance is 20GB for EBB Plan. In addition to the EBB plan data allowance, Boomerang is providing unlimited data once the subscriber has exhausted the 20GB under the EBB plan. The courtesy "unlimited data" is accessible to EBB subscribers who call in for the courtesy data. This courtesy is not part of the EBB program or the LifeLine program, but is a separate limited time option by Boomerang.

<sup>4</sup> Discounts for California LifeLine subscribers with EBB on the same device are subtracted from the EBB \$50.00 rate until the \$50.00 is exhausted in the following order: federal Lifeline ((\$5.25 – voice MSS plan or \$9.25 – broadband MSS plan), EBB Program subsidy (\$50.00), California LifeLine SSA subsidy (\$14.85 for 6G broadband). Any remaining non-reimbursed value is funded by the Company.

<sup>5</sup> California LifeLine reimbursement will be \$0.00 due to the application of the federal Lifeline reimbursement (\$5.25 or \$9.25 depending on underlying Lifeline MSS) and the EBB Program subsidy (\$50.00), leaving \$0.00 to be funded through the California LifeLine SSA.

**Attachment E: June 22, 2021 Administrative Letter**

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 22, 2021

To: Service List for Rulemaking 20-02-008 and Approved California LifeLine Service Providers

**Re: FURTHER GUIDANCE REGARDING THE SUBMISSION OF ADVICE LETTERS AND REIMBURSEMENT CLAIMS FOR CALIFORNIA LIFELINE SERVICE PROVIDERS WHO ARE PARTICIPATING IN THE FCC EMERGENCY BROADBAND BENEFIT PROGRAM**

On April 19, 2021, the California Public Utilities Commission's (CPUC) Communications Division (CD) provided guidance to the California LifeLine service providers regarding the federal Emergency Broadband Benefit (EBB) Program. CD hereby issues this letter to provide further clarification on the EBB.

**A. Summary**

- Service providers must file a Tier 1 Advice Letter for wireline and a Tier 2 Advice Letter for wireless in order to offer the EBB plans to California LifeLine participants.
- California LifeLine participants must be on a standard (non-EBB) California LifeLine service plan or a California Lifeline EBB approved plan.
- Service providers may only offer EBB service offerings that have been approved by the Universal Service Administrative Company (USAC). Offerings must be at the same rates/prices as approved by USAC.
- CD is working with the California LifeLine third-party administrator (TPA) to create new service tiers for the EBB service offerings and will provide further instructions to service providers regarding assignment of customers to new service tiers.
- CD is working with USAC to coordinate and exchange California Lifeline eligibility data more frequently.

**B. Guidance for Advice Letters**

All California LifeLine participants must be on a California LifeLine approved plan. Accordingly, California LifeLine service providers who have elected to participate in the EBB program and desire to offer EBB plans as part of their authorized California Lifeline plans, regardless of whether they

**Attachment F: Caleb Jones' Email for the May 11, 2021 Working Group Agenda**

**From:** Jones, Caleb <Caleb.Jones@cpuc.ca.gov>

**Sent:** Tuesday, May 11, 2021 12:42 PM

**To:** Tully, Tony <tony.tully@cpuc.ca.gov>; Bass, Lisa <Lisa.Bass@cpuc.ca.gov>; evotaw@varcomm.biz; Vasquez-Luna, Maria <Maria.Vasquez-Luna@cpuc.ca.gov>; CUGAZAPONTE@tracfone.com; taylorm@STCG.NET; maheen.cook@nalalifeline.org; Taylor Koep <Taylor.Koep@consolidated.com>; cpuc lifeline@gcioa.com; jvanarsdall@gcioa.com; Tommy.Johnson@charter.com; Rachel.Schmeidler@sprint.com; DLee@cwclaw.com; Floyd.Jasinski@consolidated.com; Shelbie Roozen <Shelbie.Roozen@consolidated.com>; pdudhbhate@truconnect.com; Teri.Powell@consolidated.com; Lorrie.Bernstein@mossadams.com; bonnieb@volcanotel.com; Carla.Liff@cgminc.com; wallen@legioconsulting.com; Hill.Aggie@TCTelephone.net; regulatory@genmobile.com; JamesRGraettinger@maximus.com; jcarter@gcioa.com; dhazell@gcioa.com; Costello.Robert@TCTelephone.net; akshayb@truconnect.com; jaguirre@truconnect.com; hsanchez@truconnect.com; Joe.Chicoine@FTR.com; decapgrowth@gmail.com; AMUNOZ-LEDO@tracfone.com; jcarter@standupwireless.com; Jeff.Schrank@cgminc.com; mg7297@att.com; jvanarsdall@standupwireless.com; safelinkom@tracfone.com; charlieb@calore.net; mcapiral@truconnect.com; mottscz@sdc corp.org; SBerlin@fh2.com; jrcarter@readywireless.com; ColleenMDuke@maximus.com; LauraJRosenak@maximus.com; Suresh.Muppala@solixinc.com; Topete, Angelique <angelique.topete@cpuc.ca.gov>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>; Lee, Tina <tina.lee@cpuc.ca.gov>; Sansone, Robert <Robert.Sansone@cpuc.ca.gov>; Sellden, You-Young "Clover" <You-Young.Sellden@cpuc.ca.gov>; Worster, Chari <chari.worster@cpuc.ca.gov>; MONDON, JEFFREY A <jm7626@att.com>; Kisten Berryhill <k.berryhill@siskiyoutelephone.com>; Mindy Duvall <MindyD@Ponderosatel.com>; Linda Lassen <LindaL@stcg.net>; wcharley@cwclaw.com; Judy Holliday (Consultant) <Judy.Holliday@cpuc.ca.gov>; Vanessa Garcia (Consultant) <Vanessa.Garcia@cpuc.ca.gov>; Rottman, Mary <Mary.Rottman@cpuc.ca.gov>; Jack Mitchell <jmitchell@telecomcounsel.com>; cmailloux@turn.org; Norina.Moy@sprint.com; Traini, Tony [GA] <Tony.Traini@t-mobile.com>; Charkowicz, Ed <ed.charkowicz@cpuc.ca.gov>; Reynolds, F. Alan <FrankAlan.Reynolds@cpuc.ca.gov>; dmorrison@calore.net

**Cc:** Daryl E Reiber/MAXIMUS <DarylEReiber@maximus.com>; Kristi Olson <kristi@calore.net>; MyLoc Dinh <myloc.dinh@genmobile.com>; DiLollo, Rick <RichardDiLollo2@maximus.com>; Eric Schimpf <eschimpf@standupwireless.com>; Yanet Castro <YCastro@tracfone.com>; Anthony Lombardo <anthony.lombardo@genmobile.com>; DiLollo, Rick <RickDiLollo@maximus.com>; Bill <bill@schultzreinv.com>; Enis, Phillip <phillip.enis@cpuc.ca.gov>; Hariharan, Amar@CIO <Amar.Hariharan@state.ca.gov>; Amar Hariharan (Consultant) <Amar.Hariharan@cpuc.ca.gov>; Sinha, Abhishek <abhishek.sinha@solixinc.com>; Hector Corral <hbcorral@gmail.com>; Corral, Hector <Hector.Corral@cpuc.ca.gov>; Armando Artigas <AArtigas@tracfone.com>

**Subject:** Today's Working Group Agenda

**AGENDA**

1. California LifeLine Program:

- Emergency Broadband Benefit:
  - EBB launches nationally tomorrow. Any carriers planning to combine EBB benefits and LifeLine benefits should file an advice letter for their plan ASAP.
  - CPUC staff will approve CA LifeLine Advice Letters for EBB plans as soon as practical. We have agreed with Legal to authorize EBB plans prior to the conclusion of the 20-day protest period with the understanding that we will resolve any valid protests once we receive them, prior to reimbursing claims.
  - CPUC staff will not approve any CA LifeLine plans that stack multiple plans on a single device.
- SSA/MSS Data Request:
  - The deadline for the Data Request informing the SSA/MSS rulemaking is today, at close of business. All LifeLine providers, wireless and wireline alike, are expected to respond. Please email me ([Caleb.Jones@Cpuc.Ca.Gov](mailto:Caleb.Jones@Cpuc.Ca.Gov)) if you have any questions.
- Program Assessment:
  - Researchers at Sacramento State are conducting an assessment of the California LifeLine Program, and will be attending our next Working Group call (5/25/2021). The researchers will be conducting stakeholder interviews with many members of the Working Group, and will be available to discuss the process at our next call, if you would like to prepare any questions.

2. Share Concerns regarding California LifeLine Telephone Service Providers' Marketing and/or Selling Practices

3. FYI: ULTS Administrative Committee Vacancies: Please send interest to [mary.rottman@cpuc.ca.gov](mailto:mary.rottman@cpuc.ca.gov)

Small ILEC – 1 Primary ( the Primary person just resigned. If the current Alternate takes the Primary position than this opening will be for an Alternate)

CLEC – 1 Alternate

Consumer – 2 Alternates

CBO – 2 Primary, 3 Alternates

CPUC Public Advocates Office – 1 Alternate

4. FYI: California LifeLine Partners E-mail Address, [CaLLPartners@cpuc.ca.gov](mailto:CaLLPartners@cpuc.ca.gov)

- To ask questions about California LifeLine pilots, please send an email to [CaLLPartners@cpuc.ca.gov](mailto:CaLLPartners@cpuc.ca.gov)
- To seek staff input about potential California LifeLine pilots, please send an email to

[CaLLPartners@cpuc.ca.gov](mailto:CaLLPartners@cpuc.ca.gov)

- To ask questions about California LifeLine partnerships, please send an email to [CaLLPartners@cpuc.ca.gov](mailto:CaLLPartners@cpuc.ca.gov)

- To seek staff input about potential California LifeLine partnerships, please send an email to [CaLLPartners@cpuc.ca.gov](mailto:CaLLPartners@cpuc.ca.gov)

5. FYI: California LifeLine Working Group E-mail Address, [CaLLWorkingGroup@cpuc.ca.gov](mailto:CaLLWorkingGroup@cpuc.ca.gov)

- To submit additions to or removals from this distribution list, please send an email to [CaLLWorkingGroup@cpuc.ca.gov](mailto:CaLLWorkingGroup@cpuc.ca.gov)

- To provide feedback regarding Working Group agenda items, please send an email to [CaLLWorkingGroup@cpuc.ca.gov](mailto:CaLLWorkingGroup@cpuc.ca.gov)

Thank you.

-Caleb

**Attachment G: Caleb Jones' June 30, 2021 to July 6, 2021 Emails to Boomerang**

**From:** Jones, Caleb <[Caleb.Jones@cpuc.ca.gov](mailto:Caleb.Jones@cpuc.ca.gov)>  
**Sent:** Wednesday, June 30, 2021 3:49 PM  
**To:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>  
**Cc:** Worster, Chari <[chari.worster@cpuc.ca.gov](mailto:chari.worster@cpuc.ca.gov)>; Yun, Sindy J. <[sindy.yun@cpuc.ca.gov](mailto:sindy.yun@cpuc.ca.gov)>  
**Subject:** Boomerang Advice Letter  
Hello John,

As the Administrative Letter issued on 6/22/2021 clarified, we are only accepting Advice Letters for LifeLine/EBB plans if they have been approved by USAC.

USAC confirmed that plan submitted by Boomerang in Advice Letter #50 does not match the plan that was approved by USAC, which is:

- 20 GB for \$50

We are not accepting plans that stack the price of an EBB plan on top of the price of a LifeLine plan. As stated in our emails with you, and in the working group calls, we tentatively approved the initial Advice Letters for EBB/LifeLine plans while we continued to coordinate with the FCC and USAC to determine what plans were authorized for each provider.

Now that we have determined that the plan approved in Advice Letter #50 does not match what was authorized by USAC, we will require Boomerang to refile your Advice Letter to update the service offerings to the EBB plan that has been approved by USAC, as laid out in the 6/22 Administrative Letter.

Please let us know if you have any questions.

Thank you.

-Caleb

**From:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>  
**Sent:** Wednesday, June 30, 2021 5:35 PM  
**To:** Jones, Caleb  
**Cc:** Worster, Chari; Yun, Sindy J.; 'Julia Redman Carter' <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>  
**Subject:** [EXTERNAL] RE: Boomerang Advice Letter

Caleb,



I need some clarification. Is your concern that the illustrative non-California LifeLine plan in Exhibit A shows unlimited voice and unlimited data, instead of just 20 GB data? (The footnote in Exhibit A does show that the price to the customer is \$50.00) It seems like a simple supplement to correct this showing 20 GB and no voice would fix that.

The actual California LifeLine plans shown on Exhibit A include unlimited data, and all have a \$0.00 charge for California LifeLine customers who opt to participate in the EBB program (i.e., the Company is covering the \$50 charge for these customers). Are you saying that we actually have to charge customers \$50? If not, we do not understand what changes have to be made to the plans. Please help us understand the issue(s) that staff has with the plans so that we can revise them to meet staff's requirements. (BTW, I was on the call, but I still do not know what "stacking" means.) Thank you.

**John L. Clark**

direct line 415.765.8443

tel 415.392.7900 | fax 415.398.4321

505 Sansome Street, Suite 900 | San Francisco, CA 94111

[jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)

vCard | [www.goodinmacbride.com](http://www.goodinmacbride.com)

**From:** Jones, Caleb <[Caleb.Jones@cpuc.ca.gov](mailto:Caleb.Jones@cpuc.ca.gov)>

**Sent:** Thursday, July 1, 2021 12:22 PM

**To:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>

**Cc:** Worster, Chari <[chari.worster@cpuc.ca.gov](mailto:chari.worster@cpuc.ca.gov)>; Yun, Sindy J. <[sindy.yun@cpuc.ca.gov](mailto:sindy.yun@cpuc.ca.gov)>; 'Julia Redman Carter' <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>; Sansone, Robert <[Robert.Sansone@cpuc.ca.gov](mailto:Robert.Sansone@cpuc.ca.gov)>

**Subject:** RE: [EXTERNAL] RE: Boomerang Advice Letter

Hello John,

First of all thank you for your quick reply, and some of this is probably easiest to discuss in person, so let's start by scheduling a time to talk. My colleagues and I are all available between 2pm and 4pm today. Is there half an hour or more in that range that works for you? Most (but not all) of us also have availability tomorrow, so if there just isn't a time this afternoon that works for you, please let us know your schedule tomorrow.

Now, to dig into the issues a little bit, our concern is not about the amount of data or voice, both of which currently meet our standards. And we do not want you to charge the customer more. Our concern is that the only EBB plan USAC has told us Boomerang received authorization for costs \$50, not \$215. The CPUC is not going to approve plans for use with EBB if they have not been authorized by USAC. We are also not going to approve plans that add together the price and data of an approved EBB plan with the price and data of an approved LifeLine plan. That's what we've

referred to as “stacking” informally, but we agree that the meaning is unclear, so we’ve been moving away from using that term.

If USAC has approved the \$215 plan that you labeled “USAC approved” in your most recent advice letter, then the necessary changes will be smaller, but we will need you to provide us with documentation of that plan’s approval by USAC. Other companies have provided the confirmation email that they received from USAC at the time the plan was approved, which will be sufficient as long as the attributes of the plan – particularly the price – are made clear somewhere in the thread.

Please let us know if you can provide us with documentation of what USAC has authorized Boomerang to use for EBB, and when you would be available to discuss this further.

Thanks.

-Caleb

**From:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>

**Sent:** Tuesday, July 2, 2021 4:17 PM

**To:** Jones, Caleb

**Cc:** Worster, Chari; Yun, Cindy J.; Julia Redman Carter <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>; Sansone, Robert

**Subject:** Re: [EXTERNAL] RE: Boomerang Advice Letter

Caleb,

I am sorry it has taken me so long get back to you on this. I think that it is too late for a call, but we can circle back after the weekend. In the meantime, after a long discussion with Boomerang, I think that, in a nutshell, the issue concerns a misunderstanding (including on my part) regarding the value of the plan that USAC approved, versus the amount of EBB reimbursement Boomerang would receive. When we talk (Boomerang’s reps would like to be on the call), Boomerang can fill CD in on any missing points and answer questions.

The USAC-approved plan is 20 GB data, plus unlimited text and voice. That approval was based on a \$50 plan that Boomerang had in place in December 2020 that bundled 4 GB data, plus unlimited text and voice, for a price of \$50 (a \$5 discount off the unbundled price, which was \$15 voice/data plus \$10 per GB). Thus, Boomerang added 16 GB data to come up with its EBB proposal, which Boomerang would offer for the limited period of time that the EBB program is in effect. The retail, unbundled value of the EBB plan is, thus, \$215 (\$15 voice/data plus \$10 per GB), for which Boomerang will receive the \$50 EBB benefit. Boomerang is also, during the limited term of the EBB program, providing customers who use more than \$20 GB the opportunity to obtain unlimited GB’s of additional data at no charge by calling customer service.

Boomerang's California lifeline EBB plan is very generous, as have been Boomerang's regular California LifeLine plans all along, and Boomerang is certainly entitled, in exchange, to receive the amount of the \$14.85 LifeLine benefit under the provisions of G.O. 153.

I am pretty much available for a call any time next week, and will check in with Boomerang on available times.

John

**John L. Clark**

direct line 415.765.8443

tel 415.392.7900 | fax 415.398.4321

505 Sansome Street, Suite 900 | San Francisco, CA 94111

[jclark@goodinmacbride.com](mailto:jclark@goodinmacbride.com)

vCard | [www.goodinmacbride.com](http://www.goodinmacbride.com)

**From:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>

**Sent:** Tuesday, July 6, 2021 11:31 AM

**To:** Jones, Caleb

**Cc:** Worster, Chari; Yun, Sindy J.; Julia Redman Carter <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>; Sansone, Robert

**Subject:** Re: [EXTERNAL] RE: Boomerang Advice Letter

Caleb,

Had to decline last minute. I am still waiting for more documentation from Boomerang regarding the discussions they or their FCC attorneys had with USAC. So, at this point, I don't have what I need to inform our discussion.

John Clark

Goodin, MacBride, Squeri & Day, LLP

Cell: 925-367-5808

**From:** Jones, Caleb

**Sent:** Tuesday, July 6, 2021 12:00 PM

**To:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>

**Cc:** Yun, Sindy J.; Sansone, Robert; Worster, Chari

**Subject:** RE: [EXTERNAL] RE: Boomerang Advice Letter

Hello John,

Thank you for letting us know. We can reschedule whenever Boomerang provides that documentation.

In the meantime, I wanted to reiterate that Boomerang needs to refile an Advice Letter with an EBB plan that matches what was approved by USAC. We are considering Boomerang's tentatively-approved EBB advice letter (#49) from May to be no longer valid, effective July 1, 2021. If Boomerang is unable to provide sufficient documentation to support the \$215 price in advice letters #49 and #50, they can either amend advice letter #50 or file a new advice letter, so the price matches the \$50 plan that we understand USAC approved.

Thank you.

-Caleb

**Attachment H: Cindy Yun's July 19, 2021 Email to Boomerang**

**From:** Yun, Cindy J.  
**Sent:** Monday, July 19, 2021 9:19 AM  
**To:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>  
**Cc:** Worster, Chari; Jones, Caleb; Sansone, Robert  
**Subject:** Boomerang's Advice Letter #49

Hello John,

We are writing to follow-up on the email that Staff sent you on July 6, stating that the plans approved by USAC do not match the plans submitted to the CPUC for approval. Because the plans in Advice Letters #49 and #50 were not authorized for EBB by USAC, we consider Advice Letter #49 invalid, effective July 1. All LifeLine participants need to be on LifeLine-approved plans, so please let us know by July 23 whether Boomerang will be submitting an Advice Letter, and if so, when we should expect it. We understand that Boomerang continues to provide EBB service to LifeLine participants, so we would like to agree on a valid service plan as soon as possible.

Kindly,

Sindy J. Yun  
Staff Counsel  
CPUC | 505 Van Ness Ave. | San Francisco, CA 94102 | [www.cpuc.ca.gov](http://www.cpuc.ca.gov)  
Tel: 415 703 1999 | Email: [sindy.yun@cpuc.ca.gov](mailto:sindy.yun@cpuc.ca.gov)

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**Attachment I: Caleb Jones's August 10, 2021 Email to Boomerang**

**From:** Jones, Caleb <[Caleb.Jones@cpuc.ca.gov](mailto:Caleb.Jones@cpuc.ca.gov)>  
**Sent:** Tuesday, August 10, 2021 6:55 PM  
**To:** Julia Redman Carter <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>  
**Subject:** Boomerang's EBB Plans

Hello,

I am reaching out from the California LifeLine Program regarding Advice Letters #49 and #50, which were Boomerang Wireless' Advice Letters regarding the company's Emergency Broadband Benefit / LifeLine plans. It is our understanding that the plans approved by USAC for use in EBB are not the same as what was submitted to the CPUC. We would like to meet to discuss next steps, in order to minimize disruption to the CPUC, Boomerang, and above all, the consumers. We still believe the easiest path forward for everyone would be for Boomerang to submit a new Advice Letter based on the plans approved by USAC, but we would like to meet so that we can understand what you intend to do.

Please let us know your availability in the upcoming days. We are currently available to meet tomorrow after 2:30, Friday morning, Monday afternoon, or Tuesday afternoon. If none of those times work for you, please let us know when next week would be better for you.

Thanks.

-Caleb

**From:** Julia Redman Carter <[jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)>  
**Sent:** Thursday, August 12, 2021 3:45 PM  
**To:** Jones, Caleb  
**Cc:** JClark <[JClark@goodinmacbride.com](mailto:JClark@goodinmacbride.com)>; Lesli Rowe <[lesli.rowe@viaoneservices.com](mailto:lesli.rowe@viaoneservices.com)>  
**Subject:** [EXTERNAL] RE: Boomerang's EBB Plans

Caleb,

Boomerang just filed the revised AL-50 today (see attached). I think that this will address your concerns as it uses the plan rate approved by USAC rather than the plan value.

I am available tomorrow (Friday) between 10am and 11:00 am PT. If this works for you, please confirm the time within the hour, and we can use my bridge, 319-730-0655, PC 4640#.

Thank you,  
Julia

*Julia Redman-Carter*

Boomerang Wireless, LLC dba enTouch Wireless

319.743.4640 Direct | 319.743.1291 Fax

319.431.1658 Mobile | [jrcarter@readywireless.com](mailto:jrcarter@readywireless.com)