

**BEFORE THE  
UTAH PUBLIC SERVICE COMMISSION**

Application of Boomerang Wireless, LLC d/b/a	)	16-2590-01
enTouch Wireless for Designation Wireless as an	)	
Eligible Telecommunications	)	
Carrier in the State of Utah for the Limited	)	
Purpose of Offering Wireless	)	
Lifeline Service to Qualified Households (Low	)	
Income Only)	)	

**DIRECT TESTIMONY OF KIMBERLEY LEHRMAN**

1 Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

2 A. My name is Kimberley Lehrman. My business address is 955 Kacena Road, Suite A,  
3 Hiawatha, IA 52233.

4

5 10Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

6 A. I am testifying on behalf of Boomerang Wireless, LLC d/b/a enTouch Wireless  
7 (“Boomerang” or the “Company”), the applicant in this proceeding.

8

9 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

10 A. I am submitting testimony in support of the Application (“Application”) whereby  
11 Boomerang is seeking designation as a wireless Eligible Telecommunications Carrier  
12 (“ETC”) in the State of Utah.

13

14 Q. WHAT IS YOUR CURRENT POSITION AT BOOMERANG?

15 A. I am the President of Boomerang.

16

1 Q. HAVE YOU REVIEWED THE APPLICATION AND OTHER DOCUMENTS FILED  
2 BY BOOMERANG IN THIS PROCEEDING?

3 A. Yes.

4 Q. DO YOU ADOPT THE APPLICATION AS FILED?

5 A. Yes

6 Q. DOES BOOMERANG HOLD ANY OTHER AUTHORITY FROM THE UTAH  
7 PUBLIC SERVICE COMMISSION (“COMMISSION”)?

8 A. No, but Boomerang is anxious to receive designations as an ETC in Utah.

9

10 Q. WHAT IS THE NATURE OF BOOMERANG’S REQUEST?

11 A. Boomerang requests designation as a wireless ETC in the State of Utah for participation  
12 in the Federal Universal Service Lifeline program (Low Income only). In addition,  
13 Boomerang seeks approval of its Lifeline service plans.

14

15 Q. WHAT IS THE AREA IN WHICH BOOMERANG REQUESTS DESIGNATION AS  
16 AN ETC?

17 A. Boomerang is requesting designation for its Service Area throughout the State of Utah.  
18 Specifically, Boomerang requests the Commission approve its Service Area set forth in  
19 **Exhibit “A”** to its Application for the purpose of receiving federal low-income universal  
20 service support for prepaid wireless Lifeline services. Boomerang plans to offer Lifeline  
21 service in all areas in Utah that are served by its underlying carriers Sprint, Verizon, T-  
22 Mobile and AT&T; and therefore, Boomerang requests designation statewide, as set forth

1 in Bomerang’s Application, in all exchanges to the extent that its underlying carriers have  
2 facilities and coverage.

3 Q: DESCRIBE BOOMERANG’S LIFELINE SERVICE PLANS.

4 1. EnTouch Wireless will offer qualified consumers the EnTouch Wireless Lifeline  
5 Service Plans. Qualified Lifeline customers who reside in Utah will be provided with the  
6 following optional plans, built on the base plan, with three options for acquiring a device:

7 2. **500 Minute Plan:** This plan offers 500 voice minutes, 100 texts, and 10 MB of  
8 data per month. Customer must provide his/her own device. There is no device available with  
9 this offer, nor are discounts or promotions for devices available with this plan. Lifeline minutes,  
10 texts and data are automatically posted each month on the Lifeline customer’s service date.  
11 There is no rollover of minutes, texts, or data, and any unused minutes, texts, or data will expire  
12 on the customer’s service date the following month.

13 3. **Minimum Standard Data Plan - 500 MB Plan:** This plan offers 500 MB of  
14 data and 100 talk & text units per month. Data is 3G/4G based on network availability and  
15 device capability. Customer provides their own device as plan does not include a device.  
16 Lifeline data, units, minutes, and texts are automatically posted each month on the Lifeline  
17 customer’s service date. There is no rollover of data, units, minutes, or texts, and any unused  
18 data, units, minutes, or texts will expire on the next month’s monthly service date. All usage is  
19 subject to the Acceptable Use Policy.

20 4. **Tribal 1,100 Free Minute Plan (Tribal Base plan):** enTouch Wireless’ wireless  
21 Lifeline offering will provide eligible customers with 1,100 voice or text units and 100mb of data  
22 per month. This plan offers 1,100 minutes (where 1 minute equals 1 unit and 1 text equals 1  
23 unit), for voice and text. Lifeline free minutes are automatically posted each month on the

1 Lifeline customer's service. There are no rollover of minutes. This plan is only available to  
2 eligible applicants residing on Tribal lands. The additional minutes that exceed those offered in  
3 the 250 Free Minute plan (described above) is due to the additional \$25.00 per month in Lifeline  
4 support to qualifying low-income consumers living on Tribal lands.

5       **5. Tribal Lifeline Upgrade Data Plan:** This plan is for eligible customers that  
6 reside on Tribal lands. This new Tribal Lifeline Upgrade Data plan will include 1100 units  
7 (voice or text) without rollover and in which 1 minute equals 1 unit and 1 text equals 1 unit, as  
8 well as 500 MB of data. The plan also differs depending on the device: (1) customers can pay \$5  
9 for 90 days of service, and will receive a free entry-level smartphone; or (2) customers can pay a  
10 one-time \$25 for an iPhone 4 or equivalent, with the \$5 waived for the first 90 days, and \$5 for  
11 90 days after that. Also for this Tribal plan, if a customer chooses not to renew the paid plan, he  
12 or she will be converted to a Tribal 1,100 Free Minute plan. The Tribal 1,100 Free Minute plan  
13 will provide 1,100 units and 100 MB of data per month.

14       **6. Tribal Unlimited Unit & 750MB Plan:** (TRIBAL Offering Only.), effective  
15 12/2/2016. This plan offers unlimited talk and text units (where 1 minute equals 1 unit and 1 text  
16 equals 1 unit) and 750 MB of data each month. A free entry level smart phone is available to  
17 eligible subscribers who have not received a free phone in the most recent 12 month period.  
18 Lifeline free minutes, units and data are automatically posted each month on the Lifeline  
19 customer's monthly service date. The Tribal plan is only available to eligible customers who  
20 reside on Federal recognized Tribal lands. There is no roll over of minutes. All usage is subject  
21 to the Company's Acceptable Use Policy.

22 Q. DOES BOOMERANG HAVE ETC DESIGNATION IN ANY OTHER  
23 JURISDICTION?

1 A. Yes. The Company has been granted ETC designation in the following States: Arizona,  
2 Arkansas, California, Colorado, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana,  
3 Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, North Dakota, Ohio,  
4 Oklahoma, Oregon, Nevada, Pennsylvania, Rhode Island, South Carolina, Texas,  
5 Washington, West Virginia, Wisconsin, and Wyoming, and the U. S. Territory of Puerto  
6 Rico. Boomerang also has applications pending in 19 jurisdictions for designation as an  
7 ETC on a wireless basis for federal support for Lifeline services. Boomerang has never  
8 been denied ETC designation by any state commission or by the FCC in connection with  
9 any state.

10  
11 Q. HOW WILL BOOMERANG’S DESIGNATION AS AN ETC BENEFIT UTAH  
12 SUBSCRIBERS?

13 A. Designating Boomerang as an ETC throughout its service area will make Lifeline  
14 discounts available to more Utah residents. This provision of Lifeline discounts is  
15 particularly valuable to low-income customers in the wireless field, where, to  
16 Boomerang’s knowledge, there are a limited number of wireless providers offering USF  
17 supported service and even fewer offering the same with absolutely no monthly recurring  
18 charge to the end-user. As such, the service for which Boomerang seeks ETC status is  
19 unique.

20 Designation of Boomerang as an ETC for purposes of offering the Lifeline  
21 program will serve the public interest by increasing participation of qualified consumers  
22 in those programs, thereby contributing to an overall increase in the number of Utah

1 residents receiving Lifeline service and an increase in the amount of federal USF dollars  
2 benefitting Utah residents.

3 Designation of Boomerang will also serve the public interest by furthering the  
4 extensive role that Boomerang believes it will play in the provision of communications  
5 service to low-income consumers, transient users, and other consumers who, due to  
6 restrictive credit criteria, deposit requirements, and long-term commitments of traditional  
7 service providers, are off network and, without any viable alternative, are likely to remain  
8 so.

9

10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

11 A. Yes.