



April 24, 2024

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501

Re: Docket TC24-002
Clarifications relating to Assurance Wireless' Supplemental Responses to Staff's Data Requests

Director Van Gerpen:

This letter is filed with the Commission to clarify certain issues asked about by Commission Staff and Counsel relating to Assurance Wireless' Supplemental Responses to Staff's Data Requests, filed on April 18, 2024 (the "Supplemental Responses").

By way of background, during the Commission meeting on the morning of April 23, 2024, Staff and Assurance Wireless' counsel informed the Commission that they would be meeting that afternoon to discuss a few questions that Staff had about the Supplemental Responses. That meeting occurred as scheduled and this letter responds to Staff's questions from that meeting.

First, Staff asked for clarification relating to Attachment 1A, submitted with the Supplemental Responses, which is a map showing zip codes in South Dakota, with zip codes colored green, orange, or black. Assurance Wireless hereby affirms that its requested Lifeline-only eligible telecommunications carrier ("ETC") service area is denoted on this map by the green-colored zip codes. These zip codes are also listed on the revised Exhibit 4 to Assurance Wireless' petition, submitted with the Supplemental Responses. Assurance Wireless requests to be designated as a Lifeline-only ETC throughout the entirety of the green-colored zip codes. Assurance Wireless does not seek ETC designation in the zip codes colored orange or black on Attachment 1A.

Second, because the scope of Assurance Wireless' proposed ETC designation is now based on static geographical boundaries (i.e., zip codes) rather than on the extent of Assurance Wireless' coverage as originally proposed, Assurance Wireless hereby confirms that if it seeks to be designated as an ETC in any locations in South Dakota beyond the green-colored zip codes, then it will come before the Commission and seek an amendment to its ETC designation to include those additional zip codes.

Third, Staff understood Assurance Wireless' response to Data Requests 1-54 and 3-4 to be only a partial commitment to adhere to A.R.S.D. 20:10:32:43.01. That was not Assurance Wireless' intent. Although Assurance Wireless maintains its objections and responses to those Data Requests, Assurance Wireless hereby clarifies that it will adhere to the requirements of A.R.S.D. 20:10:32:43.01.

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Assurance Wireless appreciates the attention of Staff, Commission Counsel, and the Commission to this matter.

Sincerely,

A handwritten signature in black ink that reads "William A. Haas". The signature is written in a cursive style with a large, stylized initial "W".

William A. Haas
Managing Corporate Counsel

Assurance Wireless