

50 Kennedy Plaza
Suite 1500
Providence, RI 02903-2319
TEL: 401.274.2000
FAX: 401.277.9600
www.haslaw.com

Matthew H. Parker
Direct Dial 401-457-5135
mparker@haslaw.com

June 2, 2011

VIA FIRST CLASS U.S. MAIL AND ELECTRONIC MAIL

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

**Re: In re: Petition of YourTel America, Inc. for Designation as an Eligible
Telecommunications Carrier in the State of Rhode Island on a Wireless Basis (Low
Income Only) – Docket No. 4239**

Dear Ms. Massaro:

Enclosed for filing, please find an original and nine copies of YourTel America, Inc.'s Responses to the Division's First Set of Data Requests.

Very truly yours



Matthew H. Parker

Enclosure

cc: Dale R. Schmick
Jon Hagopian, Esq.
Karen Lyons, Esq.
Cynthia G. Wilson-Frias, Esq.

#1131461v1

BEFORE THE
RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: PETITION OF YourTel America, Inc., :
FOR DESIGNATION AS AN ELIGIBLE :
TELECOMMUNICATIONS CARRIER IN THE STATE : DOCKET NO. 4239
OF RHODE ISLAND ON A WIRELESS BASIS (LOW :
INCOME ONLY) :

RESPONSES OF YOURTEL AMERICA, INC. TO THE
DIVISION'S FIRST SET OF DATA REQUESTS

YourTel America, Inc. ("YourTel"), by its undersigned counsel, hereby responds to the Rhode Island Division of Public Utilities and Carriers' First Set of Data Requests as set forth below.

Div1-1 Please provide a listing of all "Lifeline" free minute plans in all other states YourTel operates in as an ETC.

RESPONSE: In the three states in which YourTel operates as a wireless ETC (Missouri, Kansas and Illinois), its Lifeline free minute plan is offered with the following features:

68 MOU per Month

Rollover minutes

Local calling

Domestic Long Distance

Texting at the rate of .3 MOU per text

Free 911

Free Voicemail

Free Caller ID, Call Waiting, Caller ID, Call Forwarding and 3-

Way Calling

Roaming is blocked

Div1-2 Please explain how many additional minutes are purchased in increments listed on Page 14 of your application?

RESPONSE: Additional minutes or texts can be purchased in the following increments:

\$5.00 - 60 Minutes/Texts

\$10.00 - 200 Minutes/Texts

\$15.00 - 300 Minutes/Texts

\$20.00 - 400 Minutes/Texts

\$25.00 - 500 Minutes/Texts

\$30.00 - 600 Minutes/Texts

\$50.00 - 1300 Minutes/Texts

\$60.00 - 1700 Minutes/Texts

Div1-3 Referring to the YourTel website which has 3 Lifeline plans listed, “Lifeline Free Plan 68”, “Lifeline Free Plan 125” and “Lifeline Free Plan 250”, please explain why the company has chosen the plan 68 for Rhode Island?

RESPONSE: YourTel’s Lifeline plan offerings and markets are always under evaluation. The Lifeline Free Plan 125 and Lifeline Free Plan 250 are expected to be introduced in the near future, and when they are introduced, YourTel will be willing to amend its application to include those plans for Rhode Island.

Div1-4 The YourTel website does not provide dispute charge resolution for Lifeline customers through contact with the state commissions' consumer section when the dispute is not to the customer's satisfaction. Please explain whether the company will provide this information for Rhode Island Lifeline customers on the company's website if not, why?

RESPONSE: YourTel will include this information under the Terms – “YourTel Wireless Disputed Charges” section of its website, which is presently accessible at the following link:

http://www.yourtelwireless.com/terms/#javelin_faq35_25.

Div1-5 Please explain if there is a toll-free customer support number for Lifeline customers and if not, why?

RESPONSE: YourTel's toll-free customer support number is 1-855-299-9990. This number is also listed on the top of every page of YourTel's website.

Div1-6 Referring to the YourTel website terms of service among others state “...activation fee is \$72.” However, your Petition for Designation as an ETC states the activation fee is \$60. Please explain why there is a difference in the activation fee.

RESPONSE: The full context of the above-referenced language that formerly appeared on the website's terms of service was “The YourTel Wireless activation fee may vary by state. In most states the activation fee is \$72 and some of the activation fee may be deferred.” This was an error,

and in fact, the customary charge in most states is \$60. The website has since been corrected. Please note that the correct amount was included in Exhibit H, "YourTel Terms and Conditions," which was appended to YourTel's ETC petition.

Respectfully submitted,

YOURTEL AMERICA, INC.

By its attorneys,

A handwritten signature in black ink, appearing to read "Robin L. Main", is written over a horizontal line.

Robin L. Main (#4222)

Matthew H. Parker (# 8111)

HINCKLEY, ALLEN & SNYDER LLP

50 Kennedy Plaza, Suite 1500

Providence, RI 02903

Tel: (401) 274-2000

Fax: (401) 277-9600

rmain@haslaw.com

mparker@haslaw.com

DATED: June 2, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of June 2011 caused copies of the foregoing responses to be served upon all parties of record in this proceeding by First Class U.S. Mail, postage pre-paid, and electronic mail as follows:

Jon Hagopian, Esq.
Dept. of Attorney General
150 South Main St.
Providence RI 02903
jhagopian@riag.ri.gov
Jlanni@ripuc.state.ri.us
bkent@ripuc.state.ri.us
mcorey@riag.ri.gov
dmacrae@riag.ri.gov

Karen Lyons, Esq.
Dept. of Attorney General
150 South Main St.
Providence RI 02903
klyons@riag.ri.gov

Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick RI 02888
Lmassaro@puc.state.ri.us
Cwilson@puc.state.ri.us

A handwritten signature in black ink, appearing to read "Luly E. Massaro", is written over a horizontal line. The signature is cursive and somewhat stylized.