

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
COMMISSION’S FIRST SET OF DATA REQUESTS

YourTel America, Inc. (“YourTel”), by its undersigned counsel, hereby responds to the Rhode Island Public Utilities Commission’s First Set of Data Requests as set forth below.

1-1. Is there a service contract for a term?

Response: No, YourTel does not require service contracts with its customers.

1-2. Please explain the mechanism through which YourTel will recover the remaining balance of the \$60.00 activation fee from customers.

Response: Customers will pay all or some of the \$30 upfront when initially signing up for service and will pay the remaining amount over 12 months.

1-3. Please explain whether customers enrolled in Lifeline Free Plan 68 will be subject to roaming charges.

Response: No, roaming is blocked.

1-4. If a “Lifeline Free Plan 68” customer only uses the included minutes each month, is that customer assessed any taxes?

Response: No. The company will pay any related taxes and fees.

- 1-5. If a “Lifeline Free Plan 68” customer purchases additional airtime minutes, does that customer receive a bill from YourTel associated with the use of those minutes?

Response: No. Additional minutes are available for purchase from authorized company stores, neighborhood retail outlets that sell top-up minutes for a variety of wireless companies, via YourTel Customer Service phone support, or via our website.

- 1-6. Please indicate which verification and recertification method YourTel will employ.

Response: As YourTel is accustomed to, and experienced in, the handling of certifications and verifications from our processes in other states, YourTel will follow the Rhode Island non-DHS process and verify applicants for Lifeline and Link Up service by confirming current enrollment with applicants and accepting a fully completed certification form along with presentation of documentation of program eligibility. YourTel will also follow Rhode Island rules for verification by verifying continued eligibility via an annual random sample of 10% of its current Lifeline participants. YourTel, however, will reach out to the Department of Human Services in order to investigate and evaluate that process for careful consideration.

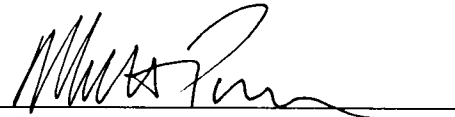
1-7. Has YourTel experienced any problems in any jurisdictions in which it has received ETC certification regarding customer “gaming” or “double dipping” in Lifeline programs between wireline and wireless service despite the self-certification under penalties of perjury that were accepted by the FCC?

Response: To our knowledge, YourTel has not been affected by “gaming” or “double dipping.” We share, however, the same concerns of many in the industry and in government, and we have strongly advocated for a national database so that carriers like YourTel can pro-actively root out inappropriate use of the fund.

Respectfully submitted,

YOURTEL, AMERICA, INC.

By its attorneys,



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DATED: May 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this 31st day of May 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:

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