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December 15, 2016

**Via Federal Express Overnight Delivery And Email To [luly.massaro@puc.ri.gov](mailto:luly.massaro@puc.ri.gov)**

Rhode Island Public Utilities Commission  
Attn: Ms. Luly Massaro  
89 Jefferson Boulevard  
Warwick, RI 02888

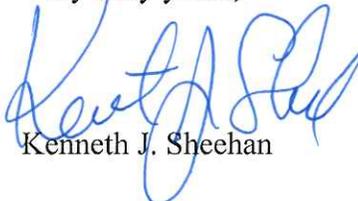
**Re: *Application of Total Call Mobile, Inc. For Approval of Relinquishment of Eligible Telecommunications Carrier Designation***  
***Docket No. 4383 + 4479***

Dear Ms. Massaro:

Enclosed for filing please find Total Call Mobile, Inc.'s Application for Approval of Relinquishment of Eligible Telecommunications Carrier Designation ("Application"). In the Application, Total Call Mobile, Inc. also requests cancellation of its related tariffs.

Please do not hesitate to call me if you have any questions regarding this matter or require additional information.

Very truly yours,

  
Kenneth J. Sheehan

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
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RECEIVED

In re: ) Docket No. 4383  
)  
Petition of Total Call Mobile, Inc. )  
for Relinquishment of Eligible )  
Telecommunications Carrier Designation )

**PETITION OF TOTAL CALL MOBILE, INC. FOR RELINQUISHMENT OF  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

Total Call Mobile, Inc. (“Total Call”), pursuant to 47 U.S.C. § 214(e), 47 C.F.R. § 54.205, and a Rhode Island Public Utilities Commission (the “Commission”) Order dated March 7, 2014 submits this Petition to the Commission of its intention to Relinquish its Eligible Telecommunications Carrier (“ETC”) Designation in the State of Rhode Island, effective December 31, 2016. Total Call also notices the cancellation and withdrawal of any and all of Total Call’s Informational Tariffs for the service on the same date. Total Call proposes to relinquish its ETC designation due to changes in the wireless industry and proposed modifications to the Lifeline program. As detailed below, Total Call has no subscribers in the State.

In support of this Petition, Total Call states as follows:

**Background**

1. Total Call is a Delaware limited liability company. Its principal place of business is 1411 190<sup>th</sup> Street, Suite 650, Gardena, CA 90248. Total Call provides wireless Lifeline telecommunications services to consumers in Rhode Island through resale of Commercial Mobile Radio Services (“CMRS”) provided by Sprint PCS (“Sprint”) and AT&T Corp. (“AT&T”).

2. By Final Decision dated March 7, 2014, the Commission granted Total Call's request for designation as a Lifeline-only ETC in Rhode Island. In re: Petition of Total Call Mobile, Inc., For Designation as an Eligible Telecommunications Carrier in the State of Rhode Island for the Purpose of Offering Lifeline Service to Qualified Households, Docket No. 4383, (the "Decision"), dated March 7, 2014.

3. Total Call seeks to relinquish its ETC designation and to discontinue service in Rhode Island due to changes in the wireless industry and proposed modifications to the Lifeline program. Total Call also intends to exit its wireless Lifeline business in every state and U.S. territory in which it currently offers wireless Lifeline service. Total Call is not currently enrolling any new Lifeline subscribers in Rhode Island.

#### **Federal and State ETC Relinquishment Requirements**

4. 47 U.S.C. § 214(e)(4) states, in pertinent part:

A State Board [...] shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State Board [...] of the relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State Board [...] shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier.

Id.; see also 47 C.F.R. § 54.205. As shown below, Total Call satisfies all relevant requirements.

#### **Designated Service Area**

5. Total Call seeks to withdraw its ETC designation throughout its entire designated service area in Rhode Island.

6. As set forth in 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, federal law requires the Commission to permit the withdrawal of an ETC designation in any area served by at least one other ETC.

7. Total Call provided wireless Lifeline service to customers in approximately thirty (30) wire centers across Rhode Island.<sup>1</sup> Each of these wire centers is served by an incumbent local exchange carrier (“ILEC”) that is designated as an ETC.

8. As a consequence, following relinquishment of Total Call’s ETC designation, Total Call’s service area will continue to be served by at least one ILEC ETC. In addition, according to USAC records, prospective subscribers will have access to at least thirteen (13) other competitive wireless Lifeline providers that provide service in at least part of Total Call’s designated service area – including Budget Mobile, Tempo Telecom, and Access Wireless.<sup>2</sup>

9. Because at least one ILEC ETC already serves each of the wire centers that Total Call serves, those ETCs will not be required to purchase or construct additional facilities to ensure that Total Call’s Lifeline subscribers continue to receive service. In addition, to the best of Total Call’s knowledge, none of the competitive wireless Lifeline providers will be required to purchase or construct additional facilities to continue providing service within the wire centers comprising Total Call’s service area.

10. Because there is at least one additional ETC in each of Total Call’s designated service areas, there is no bar to prevent it from relinquishing its ETC designation in Rhode Island, and 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205 have been met.

### **Customer Notice**

11. Total Call currently no wireless Lifeline subscribers in Rhode Island.

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<sup>1</sup> See <http://www.usac.org/hc/tools/wctozone/LASWCtoZoneSearch.aspx>.

<sup>2</sup> See <http://www.lifelinesupport.org/ls/companies/CompanyListing.aspx?state=RI&stateName=Rhode%20Island>.

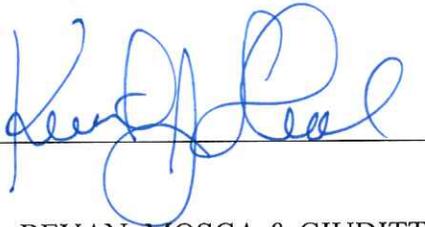
**Cancellation and Withdrawal of Total Call's Informational Tariff**

12. Given that Total Call should be permitted to relinquish its ETC designation in Rhode Island for the reasons stated above, the Commission should also permit Total Call to cancel and withdraw, as appropriate, any and all Informational Tariff or Tariffs.

**CONCLUSION**

For the foregoing reasons, Total Call respectfully seeks approval from the Commission to relinquish its Eligible Telecommunications Carrier ("ETC") designation in the State of Rhode Island, effective December 31, 2016, and the cancellation and withdrawal of any Informational Tariffs, effective the same date.

Respectfully submitted,

By: 

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Dated: December 15, 2016