

December 11, 2017

Via E-Filing
(puc.filingcenter@state.or.us)Kristi Collins
Secretary
Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, Oregon

Re: UM 1668 – Notice of Changes to Lifeline Service Offerings of Boomerang Wireless, LLC

Dear Ms. Collins:

Boomerang Wireless, LLC (“Boomerang”), pursuant to the stipulation filed in this docket on August 28, 2015 (“Stipulation”), and subsequently approved by the Oregon Public Utility Commission (“Commission”),¹ is filing its revised Lifeline service offerings with the Commission, having informally notified the Commission staff about these changes on October 31, 2017.

Boomerang is introducing its new Always On 750 Minutes Plan for non-Tribal customers, which replaces both the existing Always On 500 Minutes Plan and the Always On 500 MB Plan. Boomerang’s current Tribal offering, the Tribal Unlimited Unit & 1.5 GB Plan, is also described herein. The revised plans set forth here are described in the revised Exhibits D and E to the Stipulation, attached hereto. These revised exhibits replace the original Exhibits D and E to the Stipulation and prior revisions to those exhibits. The changes described herein are being made so that Boomerang will continue to be in compliance with federal Lifeline rules requiring that all customers be on either a data minimum standard or a voice minimum standard plan.

Boomerang’s notice of these changes complies with the Stipulation, which requires submission of proposed increases in minutes or material terms ten days before the changes become effective, and filing in this docket within ten days of the effective date. Here the changes involve an increase in minutes to the non-Tribal voice plan, Boomerang informally submitted the changes to

¹ *In the Matter of Boomerang Wireless, LLC dba Entouch Wireless, Application for Limited Designation as an Eligible Telecommunications Carrier and Eligible Telecommunications Provider for the Purpose of Offering Lifeline Service, and Request for Waiver*, Docket No. UM 1668, Order No. 15-280 (entered September 16, 2015).

Staff on October 31, 2017, more than ten days before the changes became effective on December 1, 2017, and is making this filing on or before December 11, 2017. Because customers will not see any reduction either in voice minutes or in units (which can be used for either text messages or voice calls), or to other material terms – which Boomerang understands are limited to the services eligible for support under the Oregon Telephone Assistance Program (“OTAP”), Boomerang is not making any “reductions in minutes, units, or other material terms of its Lifeline service offerings.”² Finally, although not required by the Stipulation, the revised Exhibits D and E also reflect Boomerang’s revised top-up offerings, which are not a Lifeline-supported service.

Introduction of Always On 750 Minutes Plan for Non-Tribal Customers

Boomerang has upgraded its **Always On 500 Minutes Plan**, which now becomes the **Always On 750 Minutes Plan**. The Always On 750 Minutes Plan now offers 750 voice minutes, unlimited Always On text units, an allotment of 100MB of 3G/4G data, and unlimited Always-on-Wireless-Data each month. Always-on-Wireless-Data provides access to Wi-Fi, email, and web (at 128K/sec) when the allotment of data is exhausted. The customer provides their own device, as the plan does not include a device. Lifeline minutes, texts and data are automatically posted each month on the Lifeline customer’s service date. There is no rollover of minutes, texts, or data, and any unused minutes, texts, or data will expire on the next month’s monthly service date.

Services under the Always On 750 Minutes Plan are for personal use only. Boomerang’s unlimited offerings, like all Boomerang’s offerings, are for private use and subject to the company’s Acceptable Use Policy and Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic. Data speeds and availability are subject to network availability and device capability.³ All usage is subject to the Acceptable Use Policy. See Terms of Service at www.enTouchwireless.com (Bundled Voice Plan).

Per the Lifeline Modernization Order, a 60-day Port Freeze is associated when a subscriber selects this plan. Accordingly, a subscriber may change service providers during the Port Freeze period; however, the subscriber will not be able to apply the Lifeline Benefit with any other service provider for the duration of the Port Freeze period.

² Although the Always On 500 MB Plan will be discontinued, such a discontinuation is distinct from any reduction in the material terms of a service offering, and it will not result in a reduction of any services eligible for OTAP support.

³ Availability of 3G/4G data and Always-on-Wireless-Data is subject to compatibility between the customer’s device and the underlying carrier’s system. Boomerang is not aware of any network compatibility issues impeding Boomerang customers in Oregon from utilizing data offerings.

Customers currently on the Always On 500 Minutes Plan (or predecessor plans) will be upgraded to the new Always On 750 Minutes Plan. Boomerang completed this migration as of December 1, 2017. Because upgraded customers remain on a voice minimum standard plan that is merely being upgraded, the migration will not affect any Port Freeze periods. Affected customers in Oregon were notified via text message concerning the planned upgrade by October 30, 2017.

Discontinuation of Always On 500 MB Plan for Non-Tribal Customers

Boomerang is discontinuing its **Always On 500 MB Plan**. Customers currently on the Always On 500 MB Plan (or predecessor plans) will be migrated to the new Always On 750 Minutes Plan. Boomerang completed this migration as of December 1, 2017. Because these customers are moving from a data minimum standard plan (which had a twelve-month Port Freeze) to a voice minimum standard plan, a sixty-day Port Freeze will apply, starting on each customer's migration date. Affected customers in Oregon were notified via text message concerning the planned change by October 3, 2017.

Boomerang's Offering for Tribal Customers in Oregon

Boomerang's **Tribal Unlimited Unit & 1.5 GB Plan** now offers unlimited talk and text units (where 1 minute equals 1 unit and 1 text equals 1 unit). There is no roll over of units. The plan includes an allotment of 1.5 GB of 3G/4G data each month, and includes unlimited Always-on-Wireless-Data which provides access to Wi-Fi, email, and web (at 128K/sec) when the allotment of data is exhausted. A free entry level smart phone is available to eligible subscribers who have not received a free phone in the most recent 12 month period. Lifeline free minutes, units and data are automatically posted each month on the Lifeline customer's service date. This Tribal plan is only available to eligible customers who reside on federally recognized Tribal lands. Services under the Tribal Unlimited Unit & 1.5 GB Plan are for personal use only. Boomerang's unlimited offerings, like all Boomerang's offerings, are for private use and subject to the company's Acceptable Use Policy and Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic. Data speeds and availability are subject to network availability and device capability.⁴ All usage is subject to the Acceptable Use Policy. See Terms of Service at www.enTouchwireless.com (Bundled Voice & Broadband Plan). Per the Lifeline Modernization Order, a 12-month Port Freeze is associated when a subscriber selects this plan. Accordingly, a subscriber may change service providers during the Port Freeze period; however, the subscriber will not be able to apply the Lifeline Benefit with any other service provider for the duration of the Port Freeze period.

⁴ Availability of 3G/4G data and Always-on-Wireless-Data is subject to compatibility between the customer's device and the underlying carrier's system. Boomerang is not aware of any network compatibility issues impeding Boomerang customers in Oregon from utilizing data offerings.

Revised Top-Up Offerings

Although not a Lifeline-supported service, Boomerang has also made improvements to its top-up offerings, as reflected in the revised Exhibits D and E attached hereto.

Please contact me if you have any questions regarding this filing.

Very truly yours,

DAVIS WRIGHT TREMAINE LLP



Alan J. Galloway

AJG/cap
Enclosures

LIST OF EXHIBITS

EXHIBIT D	Non-Tribal Rate Plans for Oregon, including Top-Up Plans
EXHIBIT E	Tribal Rate Plan Offering for Oregon, including Top-Up Plans

Exhibit D – Non-Tribal Rate Plan

**Boomerang Wireless, LLC d/b/a enTouch Wireless
Non-Tribal Lifeline Plan Offerings for Oregon**

FEATURE/ DESCRIPTION	ALWAYS ON 750 MINUTE PLAN
• Local Calls	Y
• National Long Distance	Y
• Nationwide Text	Y
• Free 411	Y
• 3G/4G Data per Month*	100 MB
• Always-on-Wireless-Data per Month*	Unlimited**
• Voice Minutes per Month	750
• Text Messages per Month	Unlimited**
• Data Enabled Device Included?	N
• Carry Over Minutes Month to Month	N
• Voicemail	Y
• Caller ID	Y
• Call Waiting	Y
• Call Forwarding	Y
• 3-way Calling	Y
• Minimum Term of Service	N***
• Required Credit Check and/or Deposit	N
• Monthly Recurring Charges	N
• Activation Fees	N

* 3G/4G Data provides an allotment of data each month. Always-on-Wireless-Data provides access to Wi-Fi, email, and web (at 128K/sec) when the allotted data is exhausted. Data speeds and availability are subject to network availability and device capability.

** All usage, including Unlimited, is for private use and subject to the company's Acceptable Use Policy and Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic.

*** This Lifeline plan is subject to a 60-day port freeze. Subscribers may change service providers during the Port Freeze period; however, the subscriber will not be able to apply the Lifeline Benefit with any other service provider for the duration of the Port Freeze period.

The following AirFair top-ups are available to all enTouch Oregon Lifeline subscribers. In addition, if a subscriber no longer qualifies for Lifeline benefit and wants to keep their phone, phone number, and service with enTouch, they can change from a Lifeline profile to a non-Lifeline profile and purchase airtime with the AirFair top up card options.

AirFair Top Up Options

Price	Talk/Text Units	Data	Days
\$5.00	0	500MB	30
\$10.00	0	1 GB	30
\$20.00	Unlimited†	500MB	30
\$30.00	Unlimited†	1 GB	30
\$50.00	Unlimited†	4GB	30

†Unlimited options are for private use and subject to limitations on acceptable use in the company's Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic.

Exhibit E –Tribal Rate Plan Offering for Oregon

**Boomerang Wireless, LLC d/b/a enTouch Wireless
Tribal Lifeline Plan Offerings for Oregon**

FEATURE/ DESCRIPTION	TRIBAL UNLIMITED UNIT* & 1.5 GB PLAN
• Local Calls	Y
• National Long Distance	Y
• Nationwide Text	Y
• Free 411	Y
• 3G/4G Data per Month**	1.5 GB
• Always-on-Wireless-Data per Month**	Unlimited***
• Voice Minutes per Month	Unlimited***
• Text Messages per Month	
• Data Enabled Device Included?	Entry-level Smart Phone****
• Carry Over Minutes Month to Month	N
• Voicemail	Y
• Caller ID	Y
• Call Waiting	Y
• Call Forwarding	Y
• 3-way Calling	Y
• Minimum Term of Service	N*****
• Required Credit Check and/or Deposit	N
• Monthly Recurring Charges	N
• Activation Fees	N

* 1 minute equals 1 unit and 1 text equals 1 unit

** 3G/4G Data provides an allotment of data each month. Always-on-Wireless-Data provides access to Wi-Fi, email, and web (at 128K/sec) when the allotted data is exhausted. Data speeds and availability are subject to network availability and device capability.

*** All usage, including Unlimited, is for private use and subject to the company's Acceptable Use Policy and Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic.

**** A free entry level smart phone is available to eligible subscribers who have not received a free phone in the most recent 12 month period.

***** This Lifeline plan is subject to a 12-month port freeze. Subscribers may change service providers during the Port Freeze period; however, the subscriber will not be able to apply the Lifeline Benefit with any other service provider for the duration of the Port Freeze period.

AirFair Top Up Options

The following AirFair top-ups are available to all enTouch Oregon Lifeline subscribers. In addition, if a subscriber no longer qualifies for Lifeline benefit and wants to keep their phone, phone number, and service with enTouch, they can change from a Lifeline profile to a non-Lifeline profile and purchase airtime with the AirFair top up card options.

Price	Talk/Text Units	Data	Days
\$5.00	0	500MB	30
\$10.00	0	1 GB	30
\$20.00	Unlimited†	500MB	30
\$30.00	Unlimited†	1 GB	30
\$50.00	Unlimited†	4GB	30

† Unlimited options are for private use and subject to limitations on acceptable use in the company's Terms of Service, which prohibits certain uses which result in abnormally high numbers of calls or generate excessive levels of Internet traffic.

Revision to Stipulation Exhibit E – Docket No. UM 1668 – December 11, 2017

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