

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

In the Matter of the Petition of	)	
North American Local, LLC for	)	Docket No. TC19-009
Designation as an Eligible Telecommunications	)	
Carrier in the State of South Dakota	)	

**North American Local, LLC
Responses To Third Data Requests of Staff**

North American Local, LLC ("NAL") hereby submits its response to the Third Data Request by Staff received on July 1, 2021.

Data Request 3.1. Explain how North American plans to inform potential customers whether wireless service is available at their residence. Provide any service area maps North American plans to provide potential customers. Will North American furnish its own maps or rely upon maps and coverage information from underlying carriers?

Response: North American's underlying carriers (AT&T, Verizon and T-Mobile) all keep updated coverage maps on their respective websites. North American shall provide coverage information, including the latest coverage maps of the underlying carriers, to all potential subscribers prior to their enrollment.

Data Request 3.2. Explain how North American's plan to address consumer complaints regarding service area or quality. Confirm North American will agree to cooperate with the PUC to resolve consumer complaints.

Response: North American provides live, in-house customer service for its Lifeline product support. Any service-related issue, including technical support, device replacements or underlying carrier changes will be handled by any of our customer service representatives. North American will cooperate fully with the PUC to resolve any consumer complaints. Should a subscriber become dissatisfied with a particular underlying carrier's coverage, North American will offer the subscriber the option of using one of the company's other underlying coverages or de-enrolling from the Lifeline Program. There are no associated costs to the subscriber for swapping their underlying service provider or de-enrolling from the program.

Data Request 3.3. Does North American plan to provide home internet or home telephone lifeline services in South Dakota? Explain

Response: North American has no plans to provide home internet or telephone Lifeline services. North American does presently offer mobile broadband and hot-spot capabilities on all of its Lifeline wireless devices.

Data Request 3.4 (a) Will North American require prepayment for wireless phone and data? (b) Is a customer able to purchase more data if they run out of data? Will the customer have to pay for the data upfront before using any additional data?

Response:

(a) North American does not require a prepayment on its Lifeline service.

(b) Customers are able to purchase additional data if they have depleted the data provided on their free monthly Lifeline service. Their balance will be replenished to the original data offering monthly (on the anniversary date of their enrollment). If they choose to purchase additional data, then a prepayment is required.

Data Request 3.6.(a) How will North American verify a potential customer resides in a tribal or CenturyLink area? (b) Does the National Verifier confirm a potential customer resides in a tribal or CenturyLink area?

Response: USAC's National Verifier database includes a "Tribal Map." All Lifeline providers are required to use the map without exception during the enrollment process. For a subscriber to be considered "Tribal", the subscriber's residential address must fall within the boundaries of the Tribal Map.

Data Request 3.7 Will North American enter into any agreement with a Tribe where North American would receive compensation for serving tribal areas?

Response: North American does not, and will not, receive any compensation for providing Lifeline services on any Tribal land.

Data Request 3.8 Provide updated financial information for the applicant.

Response: The financial information will be separately filed as highly-sensitive confidential information.

Data Request 3.9 Provide updated service offerings and pricing as well as any updated or new advertising and brochure materials if available.

Response: North American Local's updated service offerings and pricing is found at <https://www.northamericanlocal.com/sign-upalternate>. The current free offerings are:

Lifeline Non-Tribal	Free Smartphone	1,000 Voice Minutes	500 SMS
Lifeline Tribal	Free Smartphone	Unlimited Voice	Unlimited SMS 3GB Data

Dated: July 19, 2021

Respectfully submitted,

North American Local, LLC

By: Gene DeJordy
Counsel for North American Local, LLC
Dakelyn Consulting
766 Mill Hill Terrace
Southport, CT 06890
203-583-0256
Gene@Dakelyn.com

Certificate of Service

I hereby certify that a copy of these Responses To Staff's Third Data Requests was filed with the South Dakota Public Utilities Commission and served on the following individuals by email on July 19, 2021:

Amanda Reiss, Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave., Pierre, SD 57501
Amanda.Reiss@state.sd.us

Joseph Rezac, Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave., Pierre, SD 57501
Joseph.Rezac@state.sd.us

Cheyenne River Sioux Tribe Telephone Authority
Darla Pollman Rogers, Attorney
Riter Rogers, LLP
P.O. Box 280, Pierre, SD 57501-0280
dprogers@riterlaw.com

Boomerang Wireless, LLC dba enTouch
Andrew Gipson, Attorney
Jones Walker LLP
190 E. Capitol Street, Suite 800, Jackson, MI 39201
agipson@watkinsludlam.com

Kara Semmler, General Counsel
South Dakota Telecommunications Association
P.O. Box 57
320 East Capitol Ave., Pierre, SD 57501
karasemmler@sdtaonline.com

By: Gene DeJordy
Counsel for North American Local, LLC
Dakelyn Consulting
766 Mill Hill Terrace
Southport, CT 06890
203-583-0256
Gene@Dakelyn.com