

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

IN THE MATTER OF THE APPLICATION OF                             )  
TAG MOBILE, LLC FOR DESIGNATION AS AN                    )  
ELIGIBLE TELECOMMUNICATIONS CARRIER                 )                           CASE NO. RA-2012-0296

**NOTICE OF INTENT TO RESPOND**

Comes now TAG Mobile, LLC f/k/a dPi Mobile, LLC (“TAG Mobile” or “Company”), and, in support of its notice to the Missouri Public Service Commission that it intends to respond to the Staff of the Missouri Public Service Commission’s (“Staff”) Preliminary Staff Recommendation, states as follows:

1. On March 14, 2012, the Company filed its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) throughout the Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri (“AT&T”) exchanges solely for the purpose of receiving federal Universal Service Fund (“USF”) low-income support for Lifeline service.
2. On May 9, 2012, Staff filed its Preliminary Staff Recommendation, in which Staff recommended that the Commission “deny TAG Mobile’s Application at this time.” Staff stated that it has “significant concerns” and is also investigating a consumer complaint related to the Company’s Lifeline service. Staff requested that the Commission hold this case “in abeyance” until it has completed its investigation.
3. The Company intends to respond to Staff’s recommendation, and hopes to meet with Staff to clear up any misconceptions it may have about the Company, as demonstrated by its recommendation and recent data requests to the Company.

WHEREFORE, TAG Mobile, LLC respectfully notifies the Commission that it intends to respond to Staff’s Preliminary Staff Recommendation.

Respectfully submitted,

/s/Lisa A. Gilbreath

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this the 22nd day of May, 2012, served a true copy of the foregoing pleading upon the following parties, listed below, in accordance with Commission

Rules:

Office of the Public Counsel  
Post Office Box 7800  
Jefferson City, MO 65102

General Counsel  
Missouri Public Service Commission  
Post Office Box 360  
Jefferson City, MO 65102

/s/Lisa A. Gilbreath

Lisa A. Gilbreath