BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)	
TAG Mobile, LLC, for Designation as an)	File No. RA-2012-0296
Eligible Telecommunications Carrier.)	

PRELIMINARY STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its recommendation, states as follows:

- 1. On March 14, 20121, TAG Mobile, LLC f/k/a dPi Mobile, LLC ("TAG Mobile") requested designation as an Eligible Telecommunications Carrier ("ETC") for the purpose of receiving federal Universal Service Fund ("USF") low-income support for Lifeline services.
- 2. On April 9, 2012, the Missouri Public Service Commission ("Commission") issued an Order directing Staff to file its recommendation or, in the alternative, a Status Report, no later May 9, 2012. This filing complies with that Order.
- 3. Staff has reviewed the *Application*, as well as data request responses in non-case No. BISR-2012-0346, and has significant concerns. Staff is also investigating a consumer complaint related to TAG Mobile's lifeline service. Therefore, Staff cannot recommend approval at this time. Presently, Staff is preparing and sending further data requests to address their concerns. Therefore, Staff requests this case be held in abeyance until Staff has completed its further investigation and is able to update the Commission on its Recommendation, on or before August 9, 2012.

WHEREFORE, Staff recommends that the Commission deny TAG Mobile's Application at this time.

Respectfully submitted,

/s/ Meghan McClowry

Meghan E. McClowry Legal Counsel Missouri Bar No. 63070

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-6651 (Telephone) (573) 751-9285 (Fax) Meghan.mcclowry@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of May, 2012.

/s/ Meghan McClowry

MEMORANDUM

To: Missouri Public Service Commission Official Case File

Case No. RA-2012-0296

Company Name: TAG Mobile, LLC

From: Dana Parish

Telecommunications Department

John Van Eschen (5/9/12) Meghan McClowry (5/9/12) Utility Operations Division General Counsel's Office

Subject: Staff Recommendation Regarding TAG Mobile, LLC's ETC Application

Date: May 9, 2012

On March 14, 2012 TAG Mobile, LLC (TAG) filed an application seeking designation as an Eligible Telecommunications Carrier (ETC) limited to the receipt of federal universal service fund support for the provisioning of wireless Lifeline service. TAG is an affiliate of dPi Teleconnect, LLC who currently has ETC status for the purpose of offering both landline and wireless Lifeline service (Case No. CO-2010-0054). TAG's pending ETC application is part of a transaction involving dPi Teleconnect, LLC whereby dPi Teleconnect LLC's wireless Lifeline subscribers will be transferred to TAG. dPi Teleconnect, LLC intends to solely offer landline Lifeline service while TAG intends to solely offer wireless Lifeline service.

The Staff has reviewed the current ETC application, as well as responses to data requests issued to the company in Non-Case No. BISR-2012-0346. Based on the information we received in these documents, Staff has some significant concerns. In addition, Staff is currently investigating a consumer complaint against TAG Mobile by a Missouri wireless customer related to "free cell phone" service.

At this time Staff cannot recommend approval of TAG Mobile's ETC application until further questions can be adequately addressed.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Mobile, LLC for Designation as an E Telecommunications Carrier		Case No. RA-2012-0296	
AFFIDAVIT OF DANA PARISH			
STATE OF MISSOURI) ss COUNTY OF COLE)			
of the foregoing Staff Recommendat above case; that the information in th	tion in mem to Staff Reco forth in such	that she participated in the preparation orandum form, to be presented in the ommendation was provided to her; that a Staff Recommendation; and that such elief. Dana Parish	
Subscribed and sworn to before me thi	is oth day o	of May, 2012.	
LAURA HOLSMAN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914	-	Notary Public	