

notified the Commission that, upon the Commission's designation of dPi's affiliate TAG Mobile as a wireless ETC in the State of Missouri, dPi will will relinquish its wireless ETC status in Missouri.

4. On May 9, 2012, Staff filed its Preliminary Staff Recommendation ("Recommendation"), in which Staff recommended that the Commission "deny TAG Mobile's Application at this time." Staff stated that it has "significant concerns" that arise after its review of the Company's Application and responses to data requests. Staff requested that the Commission hold this case "in abeyance" until it has completed its investigation.

5. Staff's Recommendation comes after numerous attempts by the Company answer any additional questions that Staff might have, including a trip to Jefferson City by officers of the Company to meet with Staff. Staff now, three months after meeting with the Company and four months after the Company thoroughly addressed Staff's concerns in data request responses, unexpectedly informs the Commission that it has "significant concerns" and has propounded additional data requests on the Company that the Company believes have already been addressed.

II. The Company Has Fully Explained Its Structure and Transition Plan to Staff.

6. As fully explained to Staff through its January data request responses, in a February in-person meeting, as well as in its March Application, TAG Mobile is in the Amvensys Capital Group, LLC family of companies, along with dPi. dPi was granted ETC status as a wireline carrier by the Commission for the receipt of federal USF support in certain specified AT&T exchanges in Case No. CO-2010-0054 by Order effective June 9, 2010.

7. On December 21, 2011, Staff submitted seventeen data requests to dPi in Non-Case No. BISR-2012-0346 that concerned, among other things, the relationship between dPi and

TAG Mobile. dPi requested, and was granted, a short extension of time within which to respond to Staff's data requests, and fully and thoroughly answered those data requests.

8. On February 7, 2012, officers from both dPi and TAG Mobile (including its undersigned counsel, Mark Johnson) met with representatives of the Commission's Staff Counsel, Utility Operations Division, and Telecommunications Department to discuss the Company's history, organization, and plans for operation in Missouri. After making a presentation to the Commission personnel, the representatives of dPi and TAG Mobile responded to questions concerning the Company and its intentions for Missouri.

9. As fully explained in the January data request responses, at that February meeting, and in the Company's March Application, dPi is the only Missouri designated ETC provider in the Amvensys Capital Group, LLC family of companies. All customers currently receiving Lifeline service in Missouri are customers of dPi. TAG Mobile provides services to dPi with respect to the administration and maintenance of dPi's wireless Lifeline customers in Missouri pursuant to the Shared Services Agreement between dPi and TAG (f/k/a dPi Mobile, LLC), dated January 1, 2011 and attached to the January data request responses as Exhibit G. Upon the Commission's granting ETC status to TAG Mobile, dPi will transfer its wireless customers to TAG Mobile and will make any requisite filings to inform the Commission of that transfer.

10. Staff has been on notice of the relationship between dPi and TAG Mobile and the transition plan between the companies since January of this year. Staff took the opportunity to address any concerns it had about dPi and TAG Mobile at the February meeting between representative of those companies and itself.

11. Without any explanation as to the substance of its "significant concerns" raised in its Recommendation, the Company is at a loss as to how to address these issues. It has already

given a thorough explanation in data request responses and flown officers from around the country to personally meet with Staff—a meeting that the Company’s officers left with the understanding that Staff’s concerns had been adequately addressed. Furthermore, the new data requests propounded by Staff on May 9, 2012, raise largely the same concerns that were addressed in the January data request responses and February meeting.

12. In short, Staff has had ample opportunity to address any “significant concerns” arising from the January data request responses and Application that it now raises in its Recommendation. Significantly, Staff has been sitting on its hands since the February meeting with Company representatives that was purportedly arranged to address such concerns. That Staff now states, three months after this meeting, that it has “significant concerns” is untimely and improper.

WHEREFORE, TAG Mobile, LLC respectfully requests that the Commission grant its Application for designation as an Eligible Telecommunications Carrier and designate TAG Mobile, LLC as an ETC for low income customers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this the 29th day of May, 2012, served a true copy of the foregoing pleading upon all counsel of record.

/s/Lisa A. Gilbreath
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