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September 21, 2011

RECEIVED

SEP 21 2011

PUBLIC SERVICE
COMMISSION

Jeffrey DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

***RE: Application of Cricket Communications, Inc. for Designation as an Eligible
Telecommunications Carrier in the Commonwealth of Kentucky***

Dear Mr. DeRouen:

Enclosed for filing in this case please find an original and ten copies of Cricket Communications, Inc.'s Application for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky. Please place your file stamp on the extra copy and return to me via our runner.

If you have any questions concerning this filing, please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely yours,

Douglas F. Brent

DFB: jms
Enclosures

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RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

SEP 21 2011
PUBLIC SERVICE
COMMISSION

APPLICATION OF CRICKET COMMUNICATIONS,)
INC. FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN THE)
COMMONWEALTH OF KENTUCKY)

Case No. 2011-_____

**APPLICATION OF CRICKET COMMUNICATIONS, INC. FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE COMMONWEALTH OF KENTUCKY**

Cricket Communications, Inc. (“Cricket”) respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended (the “Act”),’ and Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”).² Cricket respectfully requests that the Commission grant this Application expeditiously, so that low-income customers in Kentucky can benefit from the variety of high-quality calling plans provided by Cricket without any unnecessary delay.

1. BACKGROUND

Cricket. Cricket provides digital wireless services on a coinmon carrier basis, offering customers unlimited calling³ at flat rates without requiring a fixed-term contract or a credit check. Directly and through its affiliates, Cricket currently serves approximately 5.8 million customers in 34 states, aiid the District of Columbia. Cricket is a Delaware corporation authorized to do business in Kentucky, and throughout the requested ETC area, pursuant to a Coininercial Mobile Radio Service (“CMRS”) license granted by the Federal Communications

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.201 *et seq.*

Unlike other providers offering only “minutes-based” prepaid calling plans to their Lifeline customers in Kentucky, Cricket uniquely offers several supported plans, with different features and price points, but each offering unlimited domestic calling from within Cricket’s licensed service territory.

Commission (“FCC”). In Kentucky, Cricket is licensed to provide wireless service in the Lexington, Louisville and Cincinnati MSAs, and a small portion of Southern Kentucky nearest Nashville, TN. Cricket initially entered the Kentucky market after it registered with the Commission in February, 2001. Cricket operates retail stores in Louisville, Lexington and Frankfort. Cricket service is also available through other retailers. Cricket is registered with the Commission as a utility, and has been assigned Utility ID No. 4201000.

Designation of Eligible Telecommunications Carriers. Sections 214(e) and 254 of the Act expressly authorize the Commission to designate Cricket as an ETC.⁴ More specifically, Section 214(e)(2) of the Act provides that, upon request and consistent with the public interest, convenience, and necessity, the Commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC, provided the requesting carrier: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services.’ The FCC’s rules impose additional requirements on a common carrier seeking designation as an ETC. As demonstrated below, Cricket satisfies each of these requirements.

Scope of Cricket Designation Request. Cricket seeks ETC designation for the purpose of receiving available support from the federal universal service fund and its state counterpart (collectively, “USF”) for low-income customers only (*i.e.*, Lifeline and Link-Up support). Cricket seeks such designation in its licensed service areas throughout the state, including areas in and around Fort Campbell, Lexington, Louisville, and Northern Kentucky. Exhibit [A] contains maps showing Cricket’s current coverage areas in Kentucky that are pertinent to this

⁴ 47 U.S.C. §§ 214(e), 254.

⁵ 47 U.S.C. § 214(e)(2). *See also* 47 C.F.R. § 54.201(d).

Application, and Exhibit [B] contains lists of the wire centers within those coverage areas.⁶ For the reasons set forth below, designating Cricket as an ETC throughout the requested service areas would serve the public interest, convenience and necessity. Cricket is not seeking high cost support and its proposed designated service area does not include the territory of any rural telephone company, so service area redefinition is not an issue.⁷ Moreover, even if Cricket were seeking designation within a rural study area, FCC⁸ and Commission⁹ precedent makes clear no analysis would be necessary anyway, because Cricket is seeking ETC designation only with respect to low-income support mechanisms.

11. CRICKET SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC IN KENTUCKY

Cricket satisfies each of the statutory and regulatory prerequisites set forth in the Act and the FCC's rules, as applied by the Commission.¹⁰ Accordingly, once Cricket is approved as an ETC, its qualified customers within the service area will be able to subscribe to supported services, and Cricket will seek reimbursement from both the federal and Kentucky USF.¹¹

A. Cricket Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program [47 C.F.R. § 54.201(d)]

Cricket provides each of the services supported by federal universal service support mechanisms, as set forth in 47 C.F.R. § 54.101, and will offer these supported services throughout the area in which it is designated as an ETC. Cricket will provide these supported services using its own facilities or a combination of its own facilities and the resale of another

⁶ Cricket's proposed service area is confined to those wire centers in Kentucky where Cricket has existing network coverage *i.e.* is providing services using its own licensed facilities, and does not include areas where Cricket may market other retail services that utilize facilities obtained through commercial agreements with other wireless licensees

⁷ See generally 47 U.S.C. § 214(e)(5)

⁸ See *Virgin Mobile USA, L.P.*, Order, 24 FCC Rcd 3381, at ¶ 39 n.101 (2009).

⁹ *Virgin Mobile USA, L.P.*, Order, Case No. 2010-00524 at 12 (June 10, 2011) ("*Virgin Mobile Order*").

¹⁰ See generally *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005)

¹¹ See Order, *An Inquiry into Universal Service and Funding Issues*, Administrative Case No. 360, at 37 (May 22, 1998) (determining Kentucky IJSF support of \$3.50 per line per month).

carrier's service. Cricket primarily will use its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching and interconnection facilities used to serve its existing customers. These supported services include:

Voice Grade Access [47 C.F.R. § 54.101(a)(1)]. "Voice grade access" permits a telecommunications user to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call. Through its interconnection agreements with local exchange carriers ("LECs") in Kentucky, Cricket's customers will be able to make and receive calls on the public switched telephone network with a minimum bandwidth of 300 to 3000 Hertz.

Local Usage [47 C.F.R. § 54.101(a)(2)]. "Local usage" is an amount of minutes of use of exchange service provided without an additional charge to end users. The FCC has specified that a local usage plan is acceptable if it is "comparable to the one offered by the incumbent LEC in the service areas for which the applicant seeks designation."¹² This comparability analysis must proceed on a case-by-case basis, and take account of value-added capabilities and services incorporated into a plan.¹³ Cricket's current local usage plans, summarized in Exhibit [C], are comparable in value to those offered by ILECs operating in the requested ETC service area. Cricket's plans offer consumers numerous benefits, including larger "local" calling areas, the availability of mobile service, and unlimited local and long-distance calling options. In addition, those plans incorporate value-added features, such as caller ID; unlimited domestic text and picture messaging; unlimited text messaging to Mexico; premium extended coverage providing unlimited service without additional roaming fees in over 4,600 domestic cities and towns; and call waiting, three-way calling, and voicemail, among other services. The Commission has

¹² See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, at ¶ 32 (2005) ("2005 ETC Order").

¹³ *Id.*

recognized that wireless calling plans like those offered by Cricket provide a variety of benefits to customers that will serve the public interest, as required in evaluating an application for ETC status. In particular, the Commission has recognized the benefits gained by wireless customers who have access not only to voice service, when they do not have access to a wireline telephone, but data service as well.¹⁴

Dual Tone Multi-Frequency Signaling or its Functional Equivalent [47 C.F.R. § 54.101(a)(3)]. Dual tone multi-frequency (“DTMF”) signaling is a method of signaling that facilitates the transportation of call set-up and call detail information. The FCC has recognized that, with respect to wireless carriers, it “is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling.”¹⁵ Cricket currently uses out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent to DTMF signaling.

Single-Party Service or its Functional Equivalent [47 C.F.R. § 54.101(a)(4)]. With respect to wireless carriers, “single-party service” affords a user a dedicated message path for the length of a user’s particular transmission. Cricket meets this requirement with respect to each of its service offerings.

Access to Emergency Services [47 C.F.R. § 54.101(a)(5)]. “Access to emergency service” includes access to services, such as 911 and enhanced 911 (“E-911”), provided by local governments or other public safety organizations. Cricket currently provides its voice customers in Kentucky with such access, is capable of delivering automatic numbering information (“ANI”) and automatic location information (“ALI”) over its existing network, and otherwise satisfies applicable state and federal E-911 requirements. Further, Cricket is registered with the

¹⁴ *Virgin Mobile Order* at 10.

¹⁵ *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd **8776**, at ¶ 71 (1997).

Keitucky CMRS Board and pays all applicable E-911 fees in a timely manner. Cricket will continue to work with local public safety answering points (“PSAPs”) within its ETC service areas to make 911 and E-911 service available to its customers. The Commission has long noted how mobile services provide access to emergency services that “can mitigate the unique risks of geographic isolation associated with living in rural communities.”¹⁶ Of course, those benefits extend to any customer travelling within the state, whether in a rural area or not.

Access to Operator Services [47 C.F.R. § 54.101(a)(6)]. “Access to operator services” means access to automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call. Cricket meets this requirement by providing access to operator services with respect to billing questions to customers dialing “611,” and access to operator services with respect to call completion to customers dialing “411.”

Access to Interexchange Service [47 C.F.R. § 54.101(a)(7)]. With respect to wireless carriers, “access to interexchange service” means access to the functional equivalent of the use of the loop, as well as that portion of the switch that is paid for by the end user, necessary to access an interexchange carrier’s network. Cricket meets this requirement by providing all of its subscribers with the ability to make and receive interexchange or toll calls through Cricket’s network.

Directory Assistance [47 C.F.R. § 54.101(a)(8)]. “Access to directory assistance” means access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings. Cricket meets this requirement by providing access to directory assistance to customers dialing “411.”

Toll Limitation [47 C.F.R. § 54.101(a)(9)]. “Toll limitation” includes the offering of either “toll control” or “toll blocking” to qualifying low-income customers, as a means of

¹⁶ *E.g., Petition of American Cellular*, Order, Case No. 2005-00130 (Aug. 15, 2005), p. 5

limiting or blocking the completion of outgoing toll calls. An ETC is not required to provide either service if it is incapable of providing such service. Cricket's calling plans do not distinguish between local and toll calls at the point of dialing, such that Cricket cannot offer toll limitation without blocking all service to a customer. Currently, all plans include unlimited local and long distance so toll blocking is unnecessary. However, if for any reason Cricket changes the structure of its service plans to distinguish between local and toll calls, Cricket will meet the toll limitation requirement by providing toll blocking.

B. Cricket Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings [47 C.F.R. § 54.201(d)(2)]

Cricket will advertise the availability of the supported services detailed above, and the corresponding rates and charges, in a manner designed to inform the general public within its designated ETC service areas. This advertising will occur through some combination of media channels, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing, and the Internet.¹⁷ Cricket already maintains a highly visible retail presence within its Kentucky service territory and its advertising for supported service will include various forms of signage and other marketing collateral that explains the Lifeline program. Attached as Exhibit [D] are sample marketing materials being used by Cricket in the state of Illinois.

C. Cricket Will Satisfy its Additional Obligations as an ETC

In addition to those requirements set forth in Section 54.201 of the FCC's rules, Cricket will satisfy other ETC requirements adopted by this Commission and the FCC. In particular:

¹⁷ Information about Cricket's service in Kentucky is online at: <http://www.inycricket.com>

Commitment to Provide Service Upon Reasonable Request [47 C.F.R. § 54.202(a)(1)]. If a request is made by a potential customer within Cricket's existing network coverage, Cricket will provide service immediately using its standard customer equipment (handsets/wireless devices). If a potential customer requests service within Cricket's designated ETC service area, but outside its existing network coverage, Cricket will follow the six-step process specified in 47 C.F.R. § 54.202(a)(1)(i). Specifically, Cricket will determine if service can be provided at reasonable cost by: (i) modifying or replacing the requesting customer's equipment; (ii) deploying a roof-mounted antenna or other equipment; (iii) adjusting the nearest cell tower; (iv) adjusting network or customer facilities; (v) reselling services from another carrier's facilities to provide service; or (vi) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. Because Cricket seeks only low-income support, as opposed to high-cost funding to support the construction of network facilities, it is not submitting a network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii).¹⁸

Ability to Remain Functional in an Emergency [47 C.F.R. § 54.202(a)(2)]. Cricket is committed to providing and maintaining essential telecommunications services in times of emergency. In particular, Cricket maintains a reasonable amount of back-up power to ensure the functionality of its service without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. More specifically, all mobile switching centers and cell sites have battery backup power, each switching center has a dedicated diesel generator, and there are several cell site generators in the market area. In instances of power outages, priority is set based upon traffic, cell site location and time of day. In certain parts of the service area, a cell on wheels (COW)

¹⁸ The FCC has made clear that this requirement applies only to carriers receiving high-cost support. *See* 2005 ETC Order at ¶ 23.

can be deployed. In case of a total switch outage, a mobile command center may be established by each switch vendor. Cricket has had direct experience in Kentucky with service restoration during an emergency. Like numerous utilities, Cricket was affected by the January 2009 ice storm. Cricket filed a comprehensive report with the Commission describing its service restoration response, and the Commission later issued a 170 page report that described wireless industry efforts after the storm as “diligent and focused.”

Satisfaction of Applicable Consumer Protection and Service Quality Standards [47 C.F.R. § 54.202(a)(3)]. Cricket will comply with all applicable state and federal consumer protection and service quality standards. Further, Cricket will abide by CTIA’s Consumer Code for Wireless Service (“CTIA Code”). Cricket has already adopted the CTIA Code and is committed to compliance with the CTIA Code throughout its service areas, including in those areas where it is seeking designation as an ETC. In particular, Cricket will use its best efforts to resolve complaints received by the Commission, and designates the following contact person to work with Commission staff to resolve any complaints or other compliance matters:

Bill Smith
Corporate Relations Supervisor
Cricket Communications, Inc.
6380 South Fiddlers Green Circle
Greenwood Village, CO 80111
(720) 374-2855 (telephone)
(720) 374-9125 (facsimile)
governorinquiry@cricketcommunications.com

Local Usage Plan [47 C.F.R. § 54.202(a)(4)]. As discussed above and in Exhibit [C], Cricket offers several local usage plans to customers. These plans, which will be available to low-income Customers, are comparable to those offered by ILECs in the service areas for which Cricket seeks ETC designation.

Equal Access [47 C.F.R. § 54.202(a)(5)]. Cricket acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other eligible telecoininunicaiioiis carrier is providing equal access within the service area.

Lifeline Certification and Verification [47 C.F.R. § 54.410]. Cricket will certify and verify consumer eligibility to participate in the Lifeline and Link-Up programs in accordance with the rules of this Commission and the FCC. Cricket will apply the eligibility criteria under the Federal Lifeline program, excluding income-based guidelines not endorsed by the Commission.¹⁹ Each year, Cricket will require each Lifeline subscriber to recertify their head of household status, certify that only one Lifeline discount is received at that household, and document their continued program eligibility for Lifeline in accordance with the annual Lifeline Certification and Verification for USAC that is due annually at the end of August and in accordance with the Commission's May 24,2007 decision in Administrative Case No. 360.²⁰

*Regulatory Fees and **Similar** Charges.* Cricket pays all applicable federal, state, and local regulatory fees, including but not limited to universal service funding requirements imposed by the Commission and the statewide 911 fee prescribed by KRS 65.7635(1), in a timely manner. Cricket submits to the Commission amounts equal to the Kentucky USF fee and Kentucky Telecoininunications Relay Service and Telecommunications Access Program fee for each customer, although these amounts are not billed directly to Cricket customers, who do not receive bills.

¹⁹ See *Inquiry into Universal Service and Funding Issues*, Order, Adm. Case No. 360 (August 24, 2004).

²⁰ *Inquiry info Universal Service and Funding Issues*, Order, Adm. Case No. 360 (May 24,2007).

III. DESIGNATING CRICKET AS A COMPETITIVE ETC WILL, SERVE THE PUBLIC INTEREST

Designating Cricket as an ETC will serve the public interest generally, and the needs of low-income customers in Kentucky in particular. Cricket has specifically tailored its wireless service plans to share the benefits of wireless telecommunications with underserved customers who have been left behind by other providers. Cricket offers unlimited voice service at affordable rates starting as low as \$35.00 per month and unlimited broadband starting at \$45.00 per month, without the typical conditions attached (such as credit checks, long-term commitments, and early termination fees) that otherwise prevent many economically disadvantaged customers from obtaining wireless services. With this foundation of simplicity and affordability as its business model, Cricket and its joint venture partners have built a network covering more than 95 million individuals in 34 states and the District of Columbia, and are steadily expanding into new communities where the telecommunications needs of consumers are not being met by existing providers.

Cricket fulfills a critical role in the marketplace by ensuring that many Americans who cannot qualify for, or afford, the services provided by other wireless providers can still enjoy the benefits of wireless telecommunications, including wireless broadband. Cricket's flat-rate, unlimited service model is ideal for many consumers on a limited budget; other carriers often impose hefty overage charges if consumers exceed their usage limit. Many consumers cannot even qualify for service from other providers because of creditworthiness concerns or the inability *to* commit to a long-term contract.

As a result, Cricket's customer base of approximately 5.8 million customers is quite unlike those of other wireless providers. Notably, approximately 80 percent of Cricket's customers have annual household incomes of less than \$50,000 and 55 percent have annual

household incomes of less than \$30,000. In contrast, just 48 percent of other wireless carriers' customers have annual household incomes of less than \$50,000. The usage patterns of Cricket's customers also are distinct. Ninety percent of Cricket's subscribers use the service for their primary phone (compared to an industry average of 50 percent), and 70 percent do not have a traditional landline phone service at home (compared to an industry average of 25 percent). Cricket's customers also use an average of approximately 1500 minutes per month—more than twice as many minutes per month as the industry average.

These figures reveal that Cricket reaches market segments that other carriers have ignored or have not effectively reached, and its customers look to Cricket for all of their telecommunications needs, including an entrance to the online world. In fact, nearly 50 percent of customers subscribing to Cricket's flat-rate wireless broadband service have never had Internet access at home—not even dial-up. Those statistics tend to underscore what Governor Beshear and the Commission emphasized when proclaiming September 12-18, 2011 as "Lifeline Awareness Week" —there are many eligible customers who are not yet aware of the programs. In his September 9 news release Chairman Armstrong noted that while 250,000 Kentucky households participate in the Lifeline program, that is a lower proportion than in many neighboring states. Cricket has already shown it reaches the market segment the Commission and Governor are concerned about. Designating Cricket as an ETC will improve its ability to serve these customers, and thus will serve the public interest. Naturally, increased competition among ETCs will inevitably lead to increased awareness of the availability of affordable Lifeline services.

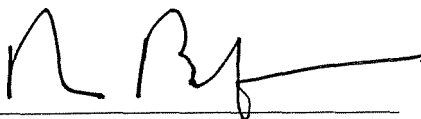
IV. CONCLUSION

As discussed above, designation of Cricket as an ETC in the Commonwealth of Kentucky is in accord with the requirements of Section 214(e)(2) of the Act, the requirements of the Commission, and is in the public interest.

WHEREFORE, for all of the foregoing reasons, Cricket respectfully requests that the Commission designate Cricket as an ETC in the Commonwealth of Kentucky solely for purposes of participating in the Lifeline program.

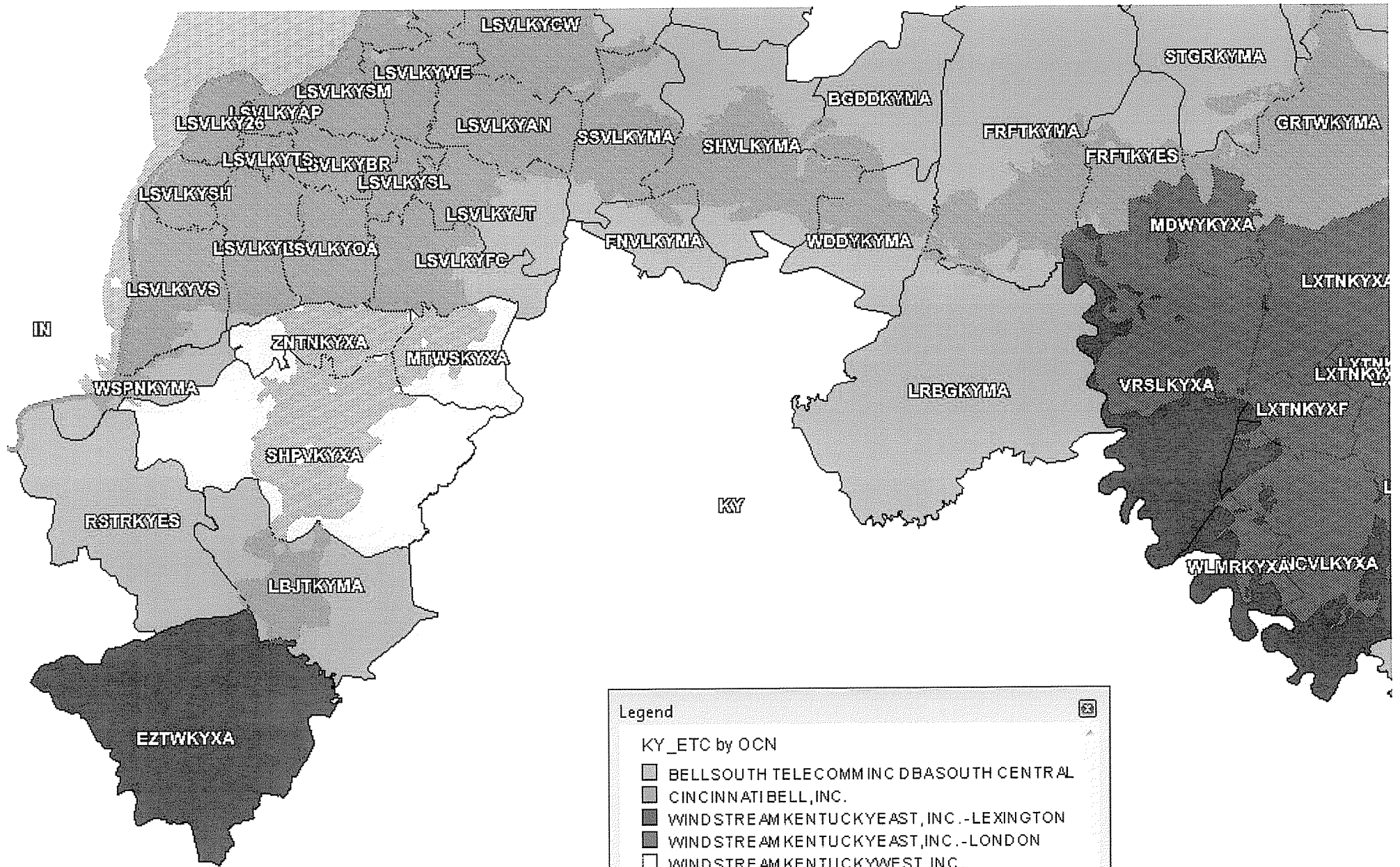
Dated: September 21, 2011

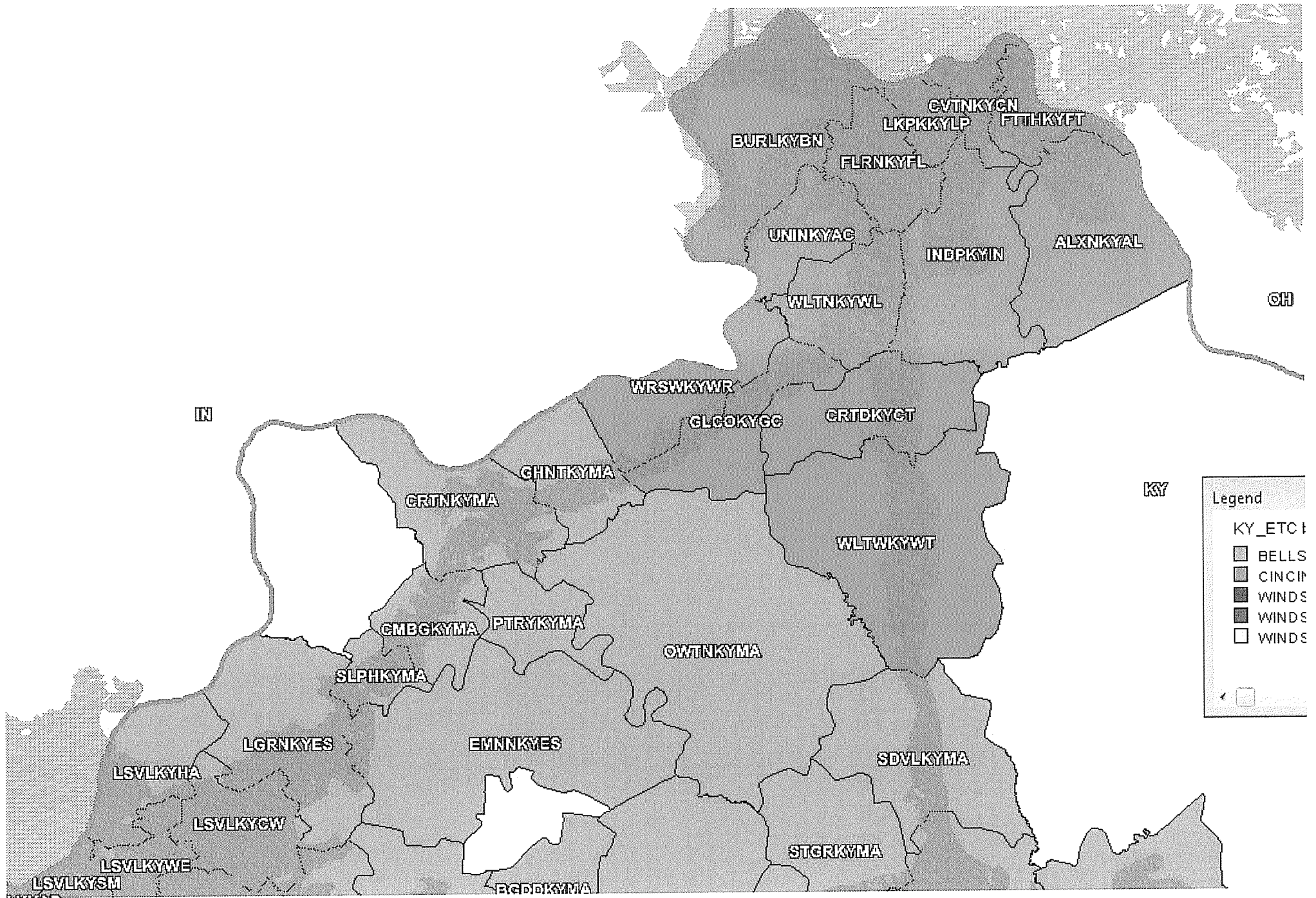
Respectfully submitted,

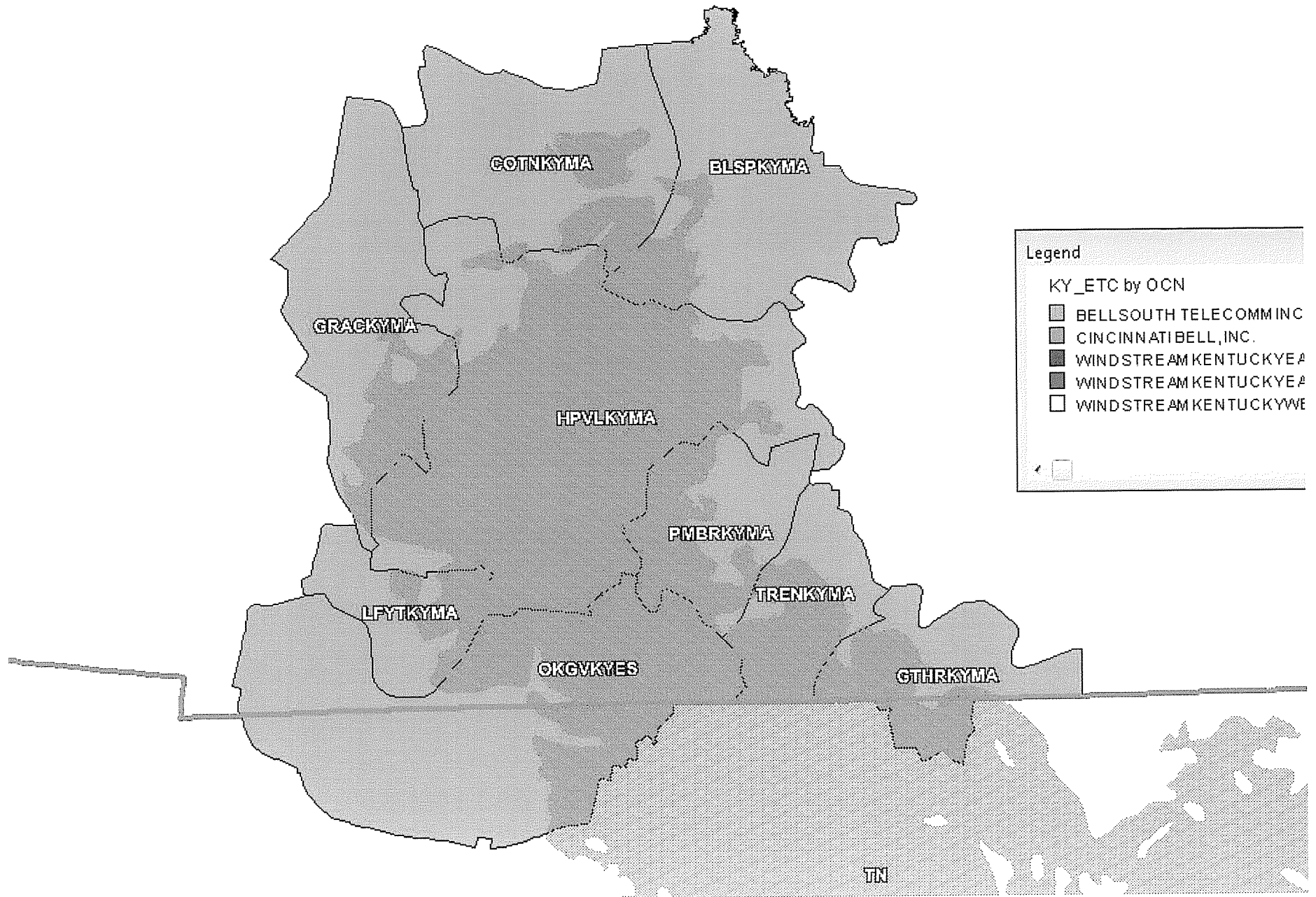
By: 

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Douglas F. Brent
STOLL KEENON OCDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
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Counselor Cricket Communications, Inc.







CLLI	OCNCat	OCN	Incumbent	Exchange
ALXNKYAL	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	ALEXANDRIA
BEREKYXA	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	BEREA
BGDDKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	BAGDAD
BLSPKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	BLUFF SPRINGS
BURLKYBN	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	BOONE
CMBGKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	CAMPBELLSBURG
COTNKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	CROFTON
CRTDKYCT	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	WILLIAMSTOWN
CRTNKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	CARROLLTON
CVTNKYCN	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	COVINGTON
EMNNKYES	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	EMINENCE
FLRNKYFL	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	BOONE
FNVLYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	FINCHVILLE
FORDKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	FORD
FRFTKYES	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	FRANKFORT
FRFTKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	FRANKFORT
FTTHKYFT	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	COVINGTON
GHNTKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	GHENT
GLCOKYGC	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	GLENCOE
GRACKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	GRACEY
GRTWKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	GEORGETOWN
GTHRKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	GUTHRIE
HPVLKYMA	WIRELESS	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	HOPKINSVILLE
INDPKYIN	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	INDEPENDENCE
KKVLKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	KIRKSVILLE
LBJTKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LEBANON JUNCTION
LFYTKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LA FAYETTE
LGRNKYES	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LA GRANGE
LKPKKYLP	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	COVINGTON
LSVLKY26	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYAN	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYAP	CLEC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	ELIZABETHTOWN
LSVLKYBE	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYBR	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYCW	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYFC	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYHA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYJT	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE

CLLI	OCNCat	OCN	Incumbent	Exchange
LSVLKYO	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYSH	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYSL	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYSM	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYTS	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYVS	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LSVLKYWE	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	LOUISVILLE
LXTNKYUK	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXA	CLEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	GEORGETOWN
LXTNKYXB	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXC	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXD	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXE	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXF	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
LXTNKYXG	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	LEXINGTON
MDWYKYXA	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	MIDWAY
MTWSKYXA	ILEC	WINDSTREAM KENTUCKY WEST, INC.	WINDSTREAM COMMUNICATIONS	MOUNT WASHINGTON
NCVLKYXA	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	NICHOLASVILLE
OKGVKYES	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	OAK GROVE
PARSKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	NORTH MIDDLETOWN
PMBRKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	PEMBROKE
PNLCKYXE	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	PAINT LICK
RCMDKYMA	CLEC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	PRESTONSBURG
SDVLKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	SADIEVILLE
SHPVKYXA	ILEC	WINDSTREAM KENTUCKY WEST, INC.	WINDSTREAM COMMUNICATIONS	SHEPHERDSVILLE
SHVLKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	SHELBYVILLE
SLPHKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	SULPHUR
SSVLKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	SIMPSONVILLE
STGRKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	STAMPING GROUND
TRENKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	TRENTON
UNINKYAC	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	BOONE
VRSLKYXA	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	VERSAILLES
WACOKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	WACO
WDDYKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	WADDY
WLMRKYXA	ILEC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WINDSTREAM COMMUNICATIONS	WILMORE
WLTNKYWL	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	WALTON
WLTWKYWT	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	WILLIAMSTOWN
WNCHKYMA	WIRELESS	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	GEORGETOWN

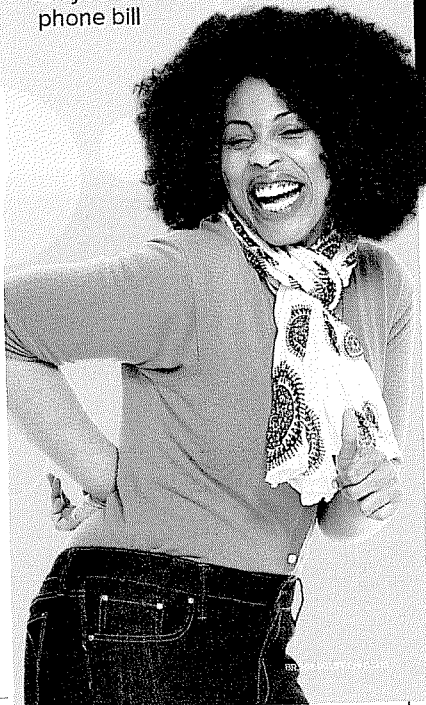
CLLI	OCNCat	OCN	Incumbent	Exchange
WRSWKYWR	ILEC	CINCINNATI BELL, INC.	CINCINNATI BELL	WARSAW
WSPNKYMA	RBOC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AT&T	WEST POINT
ZNTNKYXA	ILEC	WINDSTREAM KENTUCKY WEST, INC.	WINDSTREAM COMMUNICATIONS	ZONETON

NATIONAL PLANS

Amount		\$35	\$45	Smart	Muve Music
				Phones	\$55
Voice					
	Unlimited Long Distance Calling	X	X	X	X
	Unlimited Long Distance	X	X	X	X
	Nationwide Talk & Text Coverage	X	X	X	X
Voice Features					
	Caller ID	X	X	X	X
	Caller ID Calling	X	X	X	X
	Voice Mail	X	X	X	X
	Voice Features (VM, CI, CW, 3-Party)	\$5	X	X	X
	Call Forwarding	NA	X	X	X
Messaging					
	Unlimited National Text		X	X	X
	Unlimited Picture Video	\$5	X	X	X
	Unlimited International Text	\$5	X	X	X
Premium Services (can be handset dependant)					
	Mobile Web	\$5	X	X	X
	Data Backup & 411 Bolt-On Bundle	\$5	X	X	\$5
	Mobile Video Entertainment	\$5	\$5	X	X
	Cricket Navigator	\$5	X	X	\$5
	Ring Back Tones (2 per month)	\$5	\$5	\$5	X
	Handset Protection Plan	\$5	\$5	\$5	\$5
	Muve TV	NA	NA	NA	X
Premium Voice Services					
	International Package (30 Minutes)	\$5	\$5	\$5	\$5
	International Long Distance	NA	\$10	\$10	\$10

cricket lifeline credit

you could be eligible to
SAVE \$10/month
on your wireless
phone bill



what is the Cricket Lifeline Credit?

Lifeline is a government program that grants eligible individuals a credit each month on their phone bill. Millions of Americans benefit from this credit. Eligible customers may receive the Lifeline credit for landline or wireless service, but the credit is only available for one phone line per household. Cricket now offers a \$10 Cricket Lifeline Credit to our Illinois Cricket Wireless customers; the Cricket Lifeline Credit is not available for Cricket Broadband or Cricket PAYGo service.

how do I apply?

If you don't have a Cricket Wireless account already, you must activate a new account before you can apply for the Cricket Lifeline Credit. Once you have Cricket Wireless service, you can apply for the Cricket Lifeline Credit at a Cricket Corporate-Owned Store or an Exclusive Cricket Dealer. Just complete and sign the Cricket Lifeline Credit application (available in stores and at <http://www.mycricket.com/lifelineillinois>) and show a government-issued photo ID.

how does it work?

Once you submit your application, we'll verify your information and add the Cricket Lifeline Credit to your account. You should see your first credit within 30-60 days, typically for your first full month of service following verification of your application (if you haven't

received the credit by your second full month of service, just come back to the store for help). Each year, you will be asked to confirm your continued eligibility. That's it!

what does Cricket Lifeline Credit mean for me?

When you take advantage of the Cricket Lifeline Credit, Cricket service delivers even more value for the dollar. Step up to a higher-value rate plan, add a feature bolt-on you've always wanted, or just enjoy the savings each month!

are there any restrictions?

You must be a resident of Illinois to receive this credit. Lifeline can only be applied to one phone line per household, and the name on the account must match the name of the household member participating in the eligible program. To receive the Cricket Lifeline Credit, you must live in Cricket's designated service area, must meet

who qualifies for Cricket Lifeline Credit?

You may be eligible to receive the Cricket Lifeline Credit if you are a resident of Illinois and receive assistance from one of the following programs:

Food Stamps
(Supplemental Nutrition Assistance Program)

Medicaid (Medical Assistance)

TANF
(Temporary Assistance for Needy Families)

SSI (Supplemental Security Income)

Section 8 (Federal Public Housing Assistance)

LIHEAP
(Low-Income Home Energy Assistance Program)

National School Lunch
(Free Lunch Program Only)

Illinois' qualifications, and must verify your qualification annually.

where can I learn more?

For more information about the Cricket Lifeline Credit, please visit the Cricket Lifeline Credit information webpage below. You may also visit one of the Cricket locations listed or visit mycricket.com/locations to find a Cricket Corporate-Owned Store or an Exclusive Cricket Dealer.

Cricket Lifeline Credit Information Website:
<http://www.mycricket.com/lifelineillinois>.

Select Cricket retail stores

Aurora: 1261 Lake Street, Suite E&F, 60506
Bedford Park: 7464 S. Cicero Avenue, 60629
Chicago: 7131 Jeffery Boulevard, 60649
Chicago: 1215 N. Milwaukee Avenue, 60642
Chicago: 2650 N. Narragansett Avenue, 60639
Chicago: 4445 N. Pulaski Road, 60630

Chicago: 4814 & 4816 N. Sheridan, 60640
Chicago: 11607 S. Halsted, 60628
Chicago: 4426 S. Pulaski Road, 60632
Chicago: 5401 S. Wentworth 11B, 60609
Chicago: 3701 W. 26th Street, 60623
Chicago: 112 W. 87th Street, 60620
Chicago: 3337 W. North Avenue, 60647
Chicago: 3845 W. Roosevelt A & B, 60624
Cicero: 4728 W. Cermak Road, 60804
Dolton: 1221 E. Sibley Boulevard, 60419
Evanston: 313 Howard Street, 60202
Harwood Heights: 4713 N. Harlem, 60706
Lansing: 16901 Torrence Avenue, 60438
Rockford: 3774 E. State Street, 61108
Stone Park: 1616 N. Mannheim Road, 60165
Waukegan: 1539 N. Lewis, 60085

The Cricket Lifeline Credit is also available at Exclusive Cricket Dealer locations. For a list of these locations and additional retail stores in your area, please visit the Cricket website: <http://www.mycricket.com/locations>

KEEPS YOU CONNECTED
KEEPS YOU ON BUDGET



Cricket lifeline credit

See if you're eligible for a
\$10.00
monthly credit toward your wireless bill.

Millions of Americans already benefit
from this program. You could too.

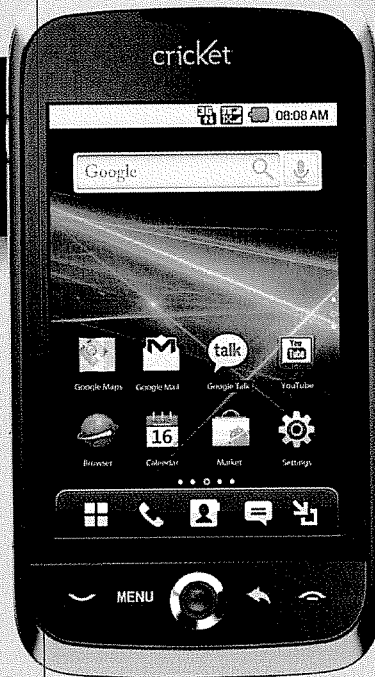
Go to mycricket.com/lifelineillinois for

more information and store locations.

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so smart,
so cricket

SAVE ON EVERY PHONE BILL



cricket
lifeline credit

Someone you know may be eligible for a monthly credit toward their wireless bill.

See store for a request form today

© 2011 Cricket Communications, Inc.
86785011PONTA1710

STATE OF CALIFORNIA)
)
COUNTY OF SAN DIEGO)


VERIFICATION

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Julie Buechler, who first being duly sworn, deposes and states that:

(1) she is a Manager Government Programs of Cricket Communications, Applicant in this matter, has read the Application being filed in and knows the contents thereof, and confirms that the statements made therein are true to the best of her knowledge and belief; and

(2) to the best of her knowledge, Cricket Communications, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares of the company, are not subject to denial of federal benefits, including benefits under the Federal Communications Act, as amended, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

Dated: 9/14/11


Julie Buechler, Manager Government Programs

Subscribed and sworn to before me, a Notary Public in the State and County above named, this _____ day of September, 2011.

See Attached

Notary Public

My Commission Expires:

CALIFORNIA JURAT WITH AFFIANT STATEMENT

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 _____
 2 _____
 3 _____
 4 _____
 5 _____
 6 _____

Signature of Document Signer No 1 _____ Signature of Document Signer No 2 (if any) _____

State of California
 County of San Diego

Subscribed and sworn to (or affirmed) before me
 on this 14th day of September, 2011,
Date Month Year

by
 (1) Julie Buechies
Name of Signer

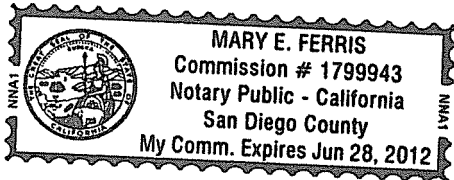
proved to me on the basis of satisfactory evidence
 to be the person who appeared before me (1)

(and

(2) _____
Name of Signer

proved to me on the basis of satisfactory evidence
 to be the person who appeared before me.)

Signature Mary E. Ferris
Signature of Notary Public



Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document

Further Description of Any Attached Document

Title or Type of Document Verification

Document Date Sept. 14, 2011 Number of Pages 1 + CA Jurat

Signer(s) Other Than Named Above: none

RIGHT THUMBPRINT OF SIGNER #1
Top of thumb here

RIGHT THUMBPRINT OF SIGNER #2
Top of thumb here