

Mark David Goss

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October 22, 2010

Via Hand-Delivery

Mr. Jeffrey Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

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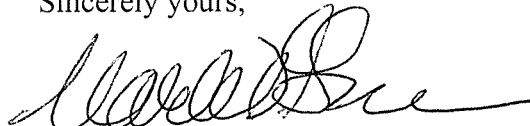
PUBLIC SERVICE
COMMISSION

Re: Case No. 2009-00100

Dear Mr. Derouen:

Enclosed please find an original and ten (10) copies of TracFone Wireless, Inc.'s Supplement to Response to Order Conditionally Designating It as an Eligible Telecommunications Carrier in the above-referenced matter. Please file these documents of record and return a file-stamped copy to me.

Sincerely yours,



Mark David Goss

Enclosures

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OCT 22 2010

PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

PETITION OF TRACFONE WIRELESS, INC.)	
FOR DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER IN THE)	CASE NO.
COMMONWEALTH OF KENTUCKY FOR THE)	2009-00100
LIMITED PURPOSE OF OFFERING LIFELINE)	
AND LINK-UP SERVICE TO QUALIFIED)	
HOUSEHOLDS)	

**SUPPLEMENT TO RESPONSE OF TRACFONE WIRELESS, INC. TO ORDER
CONDITIONALLY DESIGNATING IT AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

TracFone Wireless, Inc. ("TracFone") hereby supplements its response to the Commission's order conditionally designating it as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended, in the above-captioned matter. That response was filed with the Commission on or about October 13, 2010.

In its response, TracFone described how it would comply with the conditions imposed on its ETC designation by the Commission. By e-mail dated October 22, 2010 from Tiffany Bowman of the Commission staff, it was noted that TracFone's response did not discuss the Commission's requirement that TracFone adhere to the conditions of forbearance imposed by the Federal Communications Commission ("FCC").

By this Supplement, TracFone respectfully notifies the Commission that it will comply with each of the conditions of forbearance imposed on it by the FCC in Kentucky as it has done and is doing in every other state where it provides Lifeline service as an ETC. Those conditions include the following: 1) TracFone must provide Lifeline customers with access to 911 and E911 regardless of activation status and availability of prepaid minutes; 2) TracFone must provide its Lifeline customers with E911-compliant handsets and replace Lifeline customers' non-compliant

handsets at no charge; 3) TracFone must comply with conditions 1 and 2 above as of the date it provides Lifeline service; 4) TracFone must obtain certification from each Public Safety Answering Point (“PSAP”) where TracFone provides Lifeline service confirming that TracFone complies with condition 1¹; 5) TracFone must require its customers to self-certify at the time of service activation and annually thereafter that they are the heads of household and receive Lifeline-supported service only from TracFone; and 6) TracFone must establish safeguards to prevent its customers from receiving multiple TracFone Lifeline subsidies at the same address.

TracFone complies fully with each of these FCC-imposed conditions of forbearance in each state where it has been designated as an ETC and in which it offers Lifeline service. All TracFone customers have access to E911 service through TracFone’s underlying carriers, each of which has provided TracFone with assurances that they route TracFone customers’ 911 calls in the same manner as they route their own retail customers’ 911 calls. All TracFone Lifeline customers are provided with free E911-compliant wireless handsets; TracFone either has obtained certification of 911/E911 access from PSAPs or has self-certified 911/E911 access pursuant to the FCC’s March 2009 modification of the PSAP certification condition.² All applicants for TracFone’s Lifeline service are required to self-certify as part of the enrollment process that they are head of household and only receive Lifeline service from TracFone, and they are required to verify the continuing accuracy of those self-certifications on an annual basis so long as they remain enrolled in TracFone’s Lifeline program. Finally, TracFone has established procedures to prevent its customers from receiving multiple Lifeline subsidies at the same address. These procedures include a de-enrollment process for enrolled Lifeline customers who fail to use the service for prolonged periods of time; use of multiple data base services to

¹ This condition has been modified by the FCC. See Federal State Joint Board on Universal Service; TracFone Wireless, et al. 24 FCC Rcd. 3375 (2009).

² See footnote 1.

verify the accuracy of customer information and, in states, where available, confirming Lifeline applicants' enrollment in qualifying programs with state agencies which administer those programs.

Respectfully submitted,

TRACFONE WIRELESS, INC.



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CERTIFICATE OF SERVICE

This is to certify that I have duly served TracFone Wireless, Inc.'s Supplement to Response to Order Conditionally Designating It as an Eligible Telecommunications Carrier by first class United States mail on all parties listed, this 22nd day of October, 2010, addressed as follows:

Jerry Keathley, President
National Emergency Number Association Kentucky Chapter
4265 Dixie Highway
Dry Ridge, KY 41035

Dennis G. Howard, II
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204



Counsel for TracFone Wireless, Inc.