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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

OCT 27 2010

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)	

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

TracFone Wireless, Inc. (“TracFone”) hereby files this second supplement to 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. This second supplement is being filed pursuant to the request of Commission staff who communicated the request during a telephonic status conference conducted on October 26, 2010.

In TracFone’s initial response, filed October 13, 2010, TracFone described how it would comply with the conditions imposed on its ETC designation by the Commission. In TracFone’s First Supplement to that response, filed October 22, 2010, TracFone described how it will comply with the conditions of forbearance imposed by the Federal Communications Commission (“FCC”). In response to a request by Commission Staff, TracFone files this Second Supplement to provide additional information regarding its compliance with two of the forbearance conditions: (1) that TracFone provides Lifeline customers with access to 911 and E911 regardless of activation status and availability of prepaid minutes and (2) that TracFone must obtain certification from each Public Safety Answering Point (“PSAP”) where TracFone

provides Lifeline service confirming that TracFone complies with the requirement that it provide access to 911 services.¹

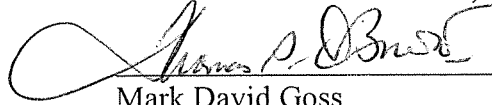
First, as stated in the First Supplement, TracFone's customers have access to 911 and E911 service through the networks of TracFone's underlying carriers, AT&T Mobility, T-Mobile, and Verizon Wireless. Each of those underlying carriers has provided TracFone with documentation stating that it routes 911 calls from TracFone's customers in the same manner as it routes 911 calls from its own retail customers. See Exhibit 1.

Second, on or about December 17, 2009, TracFone sent requests to all Kentucky PSAPs for certification that TracFone's Lifeline customers have access to 911 and E911 service. TracFone's letters to the PSAPs advised them that if they did not provide the requested certification by March 15, 2010 that TracFone's customers have access to 911 and E911 service, then TracFone would self-certify that its customers have access to 911 and E911 service in accordance with the procedures established by the FCC. A list of PSAPs that provided the requested certifications is attached as Exhibit 2. A list of PSAPs that did not provide the requested certification and for which TracFone self-certified that it meets the 911 service requirements is attached as Exhibit 3.

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). Under the modified condition, TracFone must still request such certification from each PSAP within its Lifeline service area; however, if within 90 days of TracFone's request, a PSAP has not provided the certification and the PSAP has not made an affirmative finding that TracFone does not provide its customers with access to 911 and E911 service within the PSAP's service area, TracFone may self-certify that it meets the basic and E911 requirements.

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 Second Supplement to Response to Order Conditionally Designating It as an Eligible Telecommunications Carrier by first class United States mail on all parties listed, this 27th 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.

Exhibit 1



Lane Mansell
Vice President
Partnership & Resale

AT&T Mobility
1025 Lenox Park Blvd
Atlanta, GA 30319

Date: April 14, 2009

To: All 911 Directors
Re: Routing of E911 Calls from Resold Wireless Services

Carrier provides licensed facilities-based wireless services directly to all of its customers and routes 911 calls from such customers to the Public Safety Answering Points (PSAPs) in accordance with applicable Federal Communications Commission ("FCC") enhanced 911 ("E911") legal requirements and pursuant to arrangements with PSAPs to receive such calls.¹

Carrier provides wholesale wireless service to TracFone Wireless, Inc. (TracFone), which resells such service to customers under its own brand on a prepaid basis.

As a wholesale customer of Carrier, TracFone has asked Carrier to certify that TracFone's Lifeline customers will have access to 911 and E911. In this regard, Carrier certifies that Carrier routes 911 calls according to applicable FCC E911 requirements and that it routes 911 calls from TracFone customers to PSAPs in the same manner as Carrier routes 911 calls from its own customers to PSAPs.

Carrier has engaged in 911 testing with PSAPs to confirm 911 and E911 access in accordance with applicable FCC requirements. Thus, as a resale customer of Carrier, TracFone customers have the same access to 911 and E911 as do Carrier's own customers.

Lane Mansell
NAME

Vice President – Partnership & Resale
TITLE


SIGNATURE

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EMAIL

¹ "The basic 911 rules required covered carriers to deliver all 911 calls to the appropriate PSAP...they are designed to ensure the appropriate delivery of 911 calls.... [E]nhanced 911 rules require covered wireless carriers to be capable of delivering the calling party's call back number and the calling party's location information to the requesting PSAPs. *In the Matter of IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, FCC 05-116 at p. 8, note 18, (June 3, 2005) describing the difference between basic 911 and E911 service.



MEMORANDUM
DATE: 11/25/08

Date: November 25, 2008
To: TracFone Wireless Inc.
From: T-Mobile USA, Inc.
Re: Routing of E911 Calls from Resold Wireless Services

T-Mobile USA, Inc. ("T-Mobile") provides licensed, facilities-based wireless services directly to customers and routes E9-1-1 calls from such customers to designated Public Safety Answering Points ("PSAP") in accordance with the law and pursuant to arrangements with PSAPs to receive such calls.

T-Mobile offers wholesale wireless services to TracFone Wireless, Inc. ("TracFone"), which resells such services to customers under its own brand on a prepaid basis.

Any Tracfone customer whose service is activated on the T-Mobile network and who dials 9-1-1 will have the same access to E9-1-1 as a retail customer of T-Mobile.

Dirk Mosa
Name

Vice President, Corporate Development & Wholesale
Title


Signature



Date: April 16, 2009

To: TracFone Wireless, Inc.

From: Verizon Wireless

Re: Routing of E911 Calls

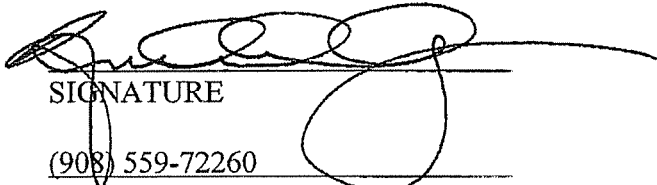
Verizon Wireless provides licensed facilities-based wireless services to its customers and routes 911 and E911 calls from such customers to the Public Safety Answering Points (PSAPs).

Verizon Wireless provides wholesale wireless service to TracFone Wireless, Inc. (TracFone), which resells such service to customers under its own brand on a prepaid basis.

As a wholesale customer of Verizon Wireless, TracFone has asked Verizon Wireless to certify that TracFone's customers who receive their underlying wireless network service via Verizon Wireless have access to 911 and E911. In this regard, subject to the capabilities of TracFone's wireless handsets/devices, Verizon Wireless certifies that it routes 911 and E911 calls from such TracFone customers to PSAPs in the same manner as it routes 911 and E911 calls from its own customers.

Richard A Craig
NAME

Director Compliance
TITLE


SIGNATURE

(908) 559-72260
PHONE

Richard.craig@verizonwireless.com

Exhibit 2

TRACFONE WIRELESS, INC.

Kentucky PSAPs that Provided 911 Certifications

Allen County
Bath County
Boyd County
Breckinridge County
Butler County
Caldwell County
Carlisle County
Carroll County
Clark County
Clinton County
Danville-Boyle County
Estill County
Fleming County
Floyd County
Frankfort/Franklin County
Garrard and Lincoln Counties
Graves County
Green County
Jefferson County
Knox County
Larue County
Lee County
Leslie County
Logan County
Madison County
McCracken County
McLean County
Montgomery County
Morgan County
Owensboro/Daviess County
Perry County
Powell County
Pulaski County
Rockcastle County
Rowan County
Russell County
Simpson County
Taylor County
Todd County
Trigg County
Washington County
Webster County
Wolfe County

Exhibit 3

TRACFONE WIRELESS, INC.

Kentucky PSAPs that Did Not Provide 911 Certifications

Anderson County
Barren County
Boone County
Bourbon County
Calloway County
Campbell County
Carter County
Casey County
Christian County
Gallatin County
Georgetown/Scott County
Greenup County
Hancock County
Hardin County
Harrison County
Henderson County
Jessamine County
Johnson County
Kenton County
Kentucky State Police
Laurel County
Lexington-Fayette County
Marshall County
Maysville-Mason County
Menifee County
Mercer County
Monroe County
Muhlenberg County
Ohio County
Oldham County
Pendleton County
Shelby County
Warren County
Wayne County
Whitley County
Woodford County