

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S DATA REQUEST
TO TRACFONE WIRELESS, INC.

TracFone Wireless, Inc. ("TracFone"), pursuant to 807 KAR 5:001, shall file with the Commission the original and four copies of the information requested herein on or before May 15, 2009. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

TracFone shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which TracFone fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Kentucky currently requires that all Eligible Telecommunications Carriers (“ETCs”) perform an audit of all customers receiving Lifeline benefits. Each customer must provide proof of eligibility. Does TracFone agree to audit all Lifeline customers each year rather than conduct a yearly audit of only a sample of customers?

2. Has TracFone begun the certification process for Public Safety Answering Points in Kentucky? If yes, when did the process begin and when will it conclude?

3. All of the incumbent local exchange carriers (“ILECs”) in Kentucky offer unlimited local calls. Provide an explanation as to how TracFone will offer a local usage plan comparable to the plans offered by the ILECs in Kentucky. Provide demonstrative evidence of such TracFone plans in other states where TracFone has received ETC designations.

4. Explain the process by which TracFone will verify the eligibility of Lifeline customers. Provide details about how and where Lifeline subscribers will be able to initiate service.

5. Refer to page 23 of the TracFone petition. What security measures will TracFone put into place to ensure that only Lifeline customers will be able to purchase usage cards from retail outlets?

6. Refer to page 24 of the TracFone petition. The petition states the Lifeline telephone accounts will remain active for one year even if no additional usage is purchased.

a. How will TracFone monitor the accounts of Lifeline customers to ensure that the customers are receiving the benefit of the service? For example, if a customer stops using his or her Lifeline TracFone after six months, or if the wireless device is damaged so that it cannot be used, will TracFone continue to credit the customer with minutes to his or her account?

b. Under the scenario described above, will TracFone continue to receive Universal Service Fund disbursements for the provision of service even if the service is not being used?

7. The Kentucky Universal Service Fund for Lifeline support is maintained by a fee of eight cents per access line per month from every wireline and wireless subscriber, which is collected by carriers. TracFone has not previously collected those funds from its Kentucky subscribers.

a. Upon receiving ETC designation, will TracFone begin contributing to the fund?

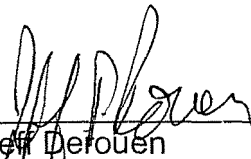
b. If so, explain how TracFone will implement the collection process and provide a detailed explanation on the methodology to be used to equate prepaid minutes to a month of service.

8. Beginning June 1, 2009, the Commission will require wireless carriers to support the Kentucky Telecommunications Relay Service and the Kentucky Telecommunications Access Program.¹ Each fund is supported by a fee of two cents per access line per month from every wireline and wireless subscriber, which is collected by the carriers.

a. Upon receiving ETC designation, will TracFone begin contributing to the funds?

b. If so, explain how TracFone will implement the collection process and provide a detailed explanation of the methodology to be used to equate prepaid minutes to a month of service.

9. Does TracFone seek to receive Lifeline support from the Kentucky Universal Service Fund?



Jeff Derouen
Executive Director
Public Service Commission
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DATED: APR 23 2009

cc: Parties of Record

¹ See Case No. 2007-00464, *Petition of the Kentucky Commission on the Deaf and Hard of Hearing to Expand the Funding Base for the Kentucky Telecommunications Access Program* (Ky. PSC Feb. 16, 2009). Wireless carriers had not been required to participate in the collection of either fee from their subscribers prior to this Order.

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