COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE STATE UNIVERSAL SERVICE FUND CASE NO. 2016-00059

MOTION TO WITHDRAW

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Sprint Communications Company L.P., Sprint Spectrum, L.P., Agent for WirelessCo., L.P., SprintCom, Inc., Virgin Mobile USA, L.P., Nextel West Corporation, and NPCR, Inc. dba Nextel Partners, (collectively "Sprint") move to withdraw from participation in the above-referenced case. In its Order¹ initiating this case, the Commission made each local exchange carrier, commercial mobile radio service provider, and eligible telecommunications carrier ("ETC") a party to this proceeding. Order, p. 1. The Commission also gave any party that is not an ETC in Kentucky receiving both federal universal service fund ("USF") and state support the opportunity to file a written request setting forth the reasons why withdrawal as a party is appropriate. Order, p. 6. Sprint moves to withdraw and states such reasons below.

ETC Status

Sprint is not an ETC in Kentucky receiving both federal USF and state support², so it meets the threshold for being permitted to set forth the reasons why withdrawal is appropriate.

Reasons Why Withdrawal as a Party is Appropriate

As already noted, Sprint does not receive state support. It therefore has no direct interest in the level of state support provided to ETCs that do receive subsidies. Moreover, most Sprint companies pass the state surcharge on to their customers via their bills. The only exception to the latter statement is that Sprint's wireless prepaid customers do not receive pass-through charges on their bills. Because the large majority of Sprint's customers are postpaid (who do receive pass-

¹ Order dated February 1, 2016.

² Of the Sprint companies, only Virgin Mobile USA, L.P. is an ETC in Kentucky, but Virgin Mobile does not receive state support. Virgin Mobile receives only federal USF support.

through charges), Sprint has a low level of interest in the surcharge changes proposed in the Order. After reviewing the Order and considering the likely economic impact of this proceeding on Sprint's operations, Sprint has determined that it is not in its interests to participate at this time. Sprint therefore moves to withdraw.

Conclusion

For the reasons stated above, Sprint respectively requests that it be permitted to withdraw from further participation in this proceeding.

Respectfully submitted this 10th day of February, 2016.

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