

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of)	
)	
)	
Petition of TracFone Wireless, Inc.)	File No. TA-2009-0327
for Designation as an Eligible Telecommunications)	
Carrier in the State of Missouri for the Limited)	
Purpose of Offering Lifeline Service to Qualified)	
Households)	

RESPONSE TO ORDER DIRECTING FILING

TracFone Wireless, Inc. (“TracFone”), by its counsel, files this Response in compliance with the Order Directing Filing, issued by the Commission on August 14, 2009. In the Order, the Commission asks the parties to answer four questions. TracFone provides its answers to those questions in this filing.

1. If the conditions suggested by the Staff of the Commission are imposed in granting TracFone Wireless, Inc.’s application and the company does not comply with those conditions, can Commission revoke TracFone’s designation as an Eligible Telecommunications Carrier?

Answer: The Commission may revoke any Eligible Telecommunications Carrier (“ETC”) designation for non-compliance with applicable legal requirements, including conditions imposed by the Commission in an order designating a carrier as an ETC. The Commission’s authority to revoke an ETC designation applies to all ETCs, including ETCs that are also incumbent local exchange carriers. In the event that the Commission were to consider revoking any carrier’s ETC designation, TracFone would expect that the Commission would provide appropriate notice, conduct a full hearing, and afford the ETC alleged to be in violation

of any legal requirement or Commission-imposed condition an opportunity to respond and defend itself before any revocation occurs.

2. Does TracFone pay into the federal Universal Service Fund?

Answer: Yes.

3. How many other states have granted ETC designation for only low income, prepaid wireless service?

Answer: TracFone has been designated as an ETC in 18 states and the District of Columbia for low income prepaid wireless service. The Federal Communications Commission designated TracFone as an ETC in the following jurisdictions: Alabama, Connecticut, Delaware, District of Columbia, Massachusetts, New Hampshire, New York, North Carolina, Pennsylvania, Tennessee, and Virginia. In addition, TracFone has been designated as an ETC by state utility commissions in the following states: Florida, Georgia, Michigan, New Jersey, Ohio, Texas, Wisconsin, and West Virginia.

4. Are there any, and if so which, states have pending applications of companies seeking ETC designation for low income, prepaid wireless service?

Answer: TracFone has pending applications for ETC designation with the commissions in the following jurisdictions: Arizona, Arkansas, California, Colorado, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Minnesota, Mississippi, Nebraska, New Mexico, Oklahoma, Oregon, Puerto Rico, South Carolina, and Washington. Other companies offering prepaid wireless services may have sought ETC designations in various states. TracFone has no specific knowledge of other companies' applications.

Respectfully submitted,

/s/ Mark P. Johnson

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August 20, 2009

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served via e-mail on this 20th day of August, 2009, on counsel of record.

/s/ Mark P. Johnson
Mark P. Johnson