

**Before the  
MISSOURI PUBLIC SERVICE COMMISSION**

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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	)	

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**TRACFONE WIRELESS, INC.’S REPLY TO STAFF RESPONSE TO  
APPLICATION FOR REHEARING**

TracFone Wireless, Inc. (“TracFone”), files this Reply to the Staff Response to the Application for Rehearing filed by TracFone regarding the Order Granting Designation as an Eligible Telecommunications Carrier (“ETC”), issued August 26, 2009. The Staff asserts in paragraph 7 of its Response that “the fact that TracFone’s service offering will have no effect on the Missouri Universal Service Fund does not mean that TracFone’s offering will have no effect on Missouri’s ratepayers.” By this Reply, TracFone advises the Commission that its SafeLink Wireless Lifeline service will only have a positive impact on Missouri’s ratepayers. First, Missouri’s ratepayers who qualify for Lifeline will have an opportunity to receive Lifeline service from TracFone, including a handset and minutes of use each month, all at no charge. Missouri’s low-income residents currently do not have a free wireless option for Lifeline service. Second, based on the success of its SafeLink Wireless Lifeline service in other states, TracFone projects that its Lifeline offering will cause a significant increase in Lifeline participation in Missouri, thereby resulting in substantial increases in the amount of federal Universal Service fund support coming into Missouri. The presence of TracFone’s SafeLink Wireless Lifeline

service in Missouri will not cause Missouri's ratepayers to incur any increased costs nor to suffer any negative impact.

Based on the foregoing and for the reasons presented in the Application for Rehearing, TracFone requests that the Commission grant its application for rehearing and issue an order granting TracFone's request for waiver of Commission rule 4 CSR 240-31.050(3).

Respectfully submitted,

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September 14, 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 14th day of September, 2009, on counsel of record.

/s/ Mark P. Johnson  
Mark P. Johnson