

**BEFORE THE**  
**MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of:

Staff's Investigation into the Practices	)	
and Procedures of Companies Offering	)	
Low Income (Lifeline) or Disabled	)	Docket: TO-2012-0364
Universal Service Fund Discounts in the	)	
State of Missouri	)	

**TRACFONE'S COMMENTS**

TracFone Wireless Inc. d/b/a SafeLink ("TracFone") submits its Comments on the Missouri Public Service Commission's ("Commission" or "MoPSC") Draft of Proposed Rulemaking for Chapter 31 of Title 4 Division 240 of the Code of Missouri State Regulations, as circulated on October 31, 2012.

TracFone strongly supports the proposed revisions to permit companies to use their own Lifeline enrollment forms. As TracFone has stated in previous comments, the existing Board-approved form requirement imposes a number of difficulties on carriers, including data collection issues and integration with existing enrollment processes. TracFone also believes the existing Board-approved form may be unnecessarily complicated, and that a uniform application form serves no real purpose. To the best of TracFone's knowledge, Missouri is the only state to impose such a requirement. Most states do not impose application form requirements at all. The FCC, on the other hand, has developed very specific requirements reflected in 47 CFR 54.410. These requirements provide for specific disclosures and customer certifications, as well as information collection requirements. However, they do not require a carrier to use any specific form, or prohibit a carrier from including additional program information or design elements in the application. They also do not impose any requirement to seek

prior approval of any company form. Under the proposed revision, carriers will be required to meet all of the obligations imposed by the FCC in its Lifeline Reform Order. The proposed Chapter 31 revision will allow carriers, as they have done in other states, to tailor the application process to make it as user friendly as possible, and ensure the back-end enrollment and data collection process is conducted efficiently. TracFone is also willing to work with staff to resolve any issues that may arise with its company specific form, as proposed in Section 3 of the proposed amendments.

For the reasons stated herein, TracFone urges the Commission to adopt the latest Chapter 31 revision as proposed.

Respectfully submitted this 8th day of November, 2012.

/s/ Stephen Athanson  
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## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) and on the General Counsel's office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov) this 8th day of November 2012.

/s/ Stephen Athanson

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