BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of)	
T-Mobile Central LLC for Designation as an)	Case No. RA-2012-0195
Eligible Telecommunications Carrier)	
For Purposes of Low Income Support Only)	
)	

SECOND SUPPLEMENT TO APPLICATION OF T-MOBILE CENTRAL LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

COMES NOW T-Mobile Central LLC ("T-Mobile" or "Company") and, upon consultation with the Staff of the Missouri Public Service Commission ("Staff") hereby supplements its Application to the Missouri Public Service Commission ("Commission") for designation as an Eligible Telecommunications Carrier ("ETC") for the limited purpose of offering and receiving Federal Universal Service Fund ("FUSF") support for providing low income related services to qualified consumers within its service area in Missouri, stating as follows:

- 1. On December 22, 2011, T-Mobile filed its Application for Designation as an Eligible Telecommunications Carrier ("Application") with the Commission. Attached as Exhibit G to T-Mobile's Application is T-Mobile's Missouri Lifeline Application form.
- 2. T-Mobile filed its first supplement to its Application on December 29, 2012, which supplemented its Application with information that it is authorized to do business in Missouri pursuant to the Commission's December 23, 2012 Order directing such filing.
- 3. On January 26, 2012, Staff served DR0001 on T-Mobile, which consisted of twenty-six (26) Data Requests as part of its follow-up to T-Mobile's Application. T-Mobile

requested, and was granted, a short extension of time in which to respond to DR0001, and timely responded on February 22, 2012. As its response to DR0001 request number 4, T-Mobile described four matters in which the FCC or any state regulatory agency has taken disciplinary action or entered into a settlement or consent decree involving T-Mobile within the past four years.

- 4. Since the time of those filings, the Federal Communications Commission ("FCC") issued a number of orders and modified its rules governing the Lifeline and Link Up programs in such a way as to affect the Company's proposed low-income service offerings in the State of Missouri. Consequently, on March 30, 2012, T-Mobile filed an Amendment to its December 22, 2011 Application in order to explain and remain consistent with those modifications made by the FCC.
- 5. Staff recently has informed T-Mobile that it believes T-Mobile needs the approval of the Missouri Universal Service Fund Board ("MO USF Board") to use a Lifeline Application form other than the generic Missouri Lifeline Application form that appears on the Commission's website. Staff requested that T-Mobile inform the Commission of T-Mobile's intentions, and Staff's agreement, with regard to the use of its Lifeline Application form in this pleading.
- 6. Upon consultation and with the agreement of Staff, T-Mobile hereby informs the Commission that it intends to use the generic Missouri Lifeline Application form that appears on the Commission's website until such time as it has received the MO USF Board's approval to use its own Lifeline Application form. After the MO USF Board has approved T-Mobile's Lifeline Application form for use in Missouri, T-Mobile intends to use its own form and to discontinue use of the generic Missouri Lifeline Application form.

- 7. Staff also requested that T-Mobile update its response to DR0001 request number 4 in this pleading. T-Mobile hereby updates that response as follows:
 - 1. <u>Kansas Universal Service Fund Audit, Kansas Corporation Commission</u> this item is closed.
 - 2. Order Imposing Fines for Alleged Failure to Meet Reporting Requirements, Puerto Rico Telecommunications Regulatory Board this item remains open. Fines have been held in abeyance pending ETC's compliance with the new monthly reporting requirements (these filings will allow the board to finalize a centralized database that will be created using the customer info included in these monthly reports by the various ETCs) Thus, it is not a one-time compliance filing but a monthly report that has been timely filed. If the ETCs keep filing the reports on time, so that the Puerto Rico Telecommunications Regulatory Board could have the centralized database up and running by May 1, 2012, the Board will eliminate the fines.
 - 3. <u>Network Outage Consent Decree, Federal Communications Commission</u> this item is closed.
 - 4. <u>Antenna Siting Consent Decree, Federal Communications Commission</u> this item is closed.
 - 5. On April 13, 2012, the FCC released a Notice of Apparent Liability for Forfeiture, in which it proposed a monetary forfeiture (civil fine) in the amount of \$819,000 against T-Mobile for apparent violations of the FCC's rules requiring a certain number or percentage of its wireless handsets to be hearing aid compatible ("HAC"). The violations occurred between November 2009-December 2010 and involved individual month shortfalls in the required number of M3 and T3 handsets. The shortfalls occurred only on the UMTS (3G) interface; the Company was fully compliant for the GSM air interface. Even on the UMTS interface, at no time did T-Mobile not have a selection of HAC handsets for customers.

WHEREFORE, T-Mobile Central LLC supplements its Application for ETC designation.

Respectfully submitted,

/s/ Lisa A. Gilbreath_____

Mark P. Johnson MBN 30740 Lisa A. Gilbreath MBN 62271 SNR Denton US LLP 4520 Main Street, Suite 1100 Kansas City, Missouri 64111 (816) 460-2400 (816) 460-531-7545 (FAX) mark.johnson@snrdenton.com lisa.gilbreath@snrdenton.com

ATTORNEYS FOR T-MOBILE CENTRAL LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2012 copies of the foregoing have been emailed to all counsel of record.

/s/Lisa A. Gilbreath
Lisa A. Gilbreath