## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigatory Docket to Review the Lifeline Program Practices of Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought to You by Virgin Mobile

#### File No. RO-2020-0XXX

#### MOTION TO OPEN AN INVESTIGATORY DOCKET

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**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its *Motion to Open an Investigatory Docket* in this matter states as follows:

1. The Commission granted Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought to You by Virgin Mobile (Assurance) status as an eligible telecommunications carrier (ETC) on February 20, 2013, in Case No. RA-2012-0264. On September 24, 2019, the Federal Communications Commission (FCC) released a statement attached here as Attachment A, regarding an investigation by the Oregon Public Utility Commission. According to the company's Missouri ETC application, Assurance is a wholly owned subsidiary of Sprint.

2. Staff asks that the Commission open an investigatory docket and permit it to issue data requests pertinent to this subject so that Staff may discern if Assurance has violated any Missouri statutes, Commission rules, federal statutes or federal rules applicable to its Lifeline service in Missouri. Should Staff discover that Assurance has violated any applicable Missouri or federal statutes or rules, it will proceed as appropriate.

WHEREFORE, Staff prays that the Commission will issue an order that opens an investigatory docket into this matter; and grant such other and further relief as is just in the circumstances.

1

Respectfully submitted,

### <u>/s/ Whitney Payne</u>

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# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 3rd day of October, 2019, to all counsel of record.

### /s/ Whitney Payne