

**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-2020-0098

PROGRESS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its *Progress Report* in this matter states as follows:

1. The Commission opened a docket to permit Staff to investigate the Lifeline program activities of Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought to You by Virgin Mobile (Assurance) on October 9, 2019. The Commission also ordered Staff to file a progress report regarding its investigation no later than April 9, 2020.

2. Staff asked that an investigation be opened to review Assurance's practices in light of a press release from the Federal Communications Commission (FCC) that the Oregon Public Utilities Commission (PUC) was investigating the Company for violations of the Lifeline program related to de-enrollment for non-usage.

3. Staff has conducted an investigation of Assurance since the opening of the docket and its findings have been compiled into a memorandum which is attached here as Attachment A. Essentially, Staff reached the determination that Assurance received money for its Missouri Lifeline subscribers which can be attributed to the same discrepancy that Oregon PUC investigated. Staff has also determined that the discrepancy stemmed from a software error.

4. Staff would ask that 1) Assurance be ordered to file quarterly updates with this Commission regarding any federal activity conducted to resolve this issue,

and 2) Assurance be ordered to file proof with this Commission in this docket that it has refunded the improperly-received funds for its Missouri Lifeline subscribers due to this error.

WHEREFORE, Staff prays that the Commission will issue an order requiring Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought to You by Virgin Mobile to file quarterly updates with this Commission in this docket regarding any federal activity conducted to resolve this issue; to file proof with this Commission in this docket that it has refunded any improperly-received funds on behalf of its Missouri Lifeline subscribers; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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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 9th day of April, 2020, to all counsel of record.

/s/ Whitney Payne