

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

In the Matter of the Application of	)	
Virgin Mobile USA, L.P.	)	
d/b/a Assurance Wireless Brought	)	
To You by Virgin Mobile for Limited Designation	)	<b>File No. RA-2012-0264</b>
As an Eligible Telecommunications Carrier	)	
In the State of Missouri	)	

**VIRGIN MOBILE USA, L.P. D/B/A ASSURANCE WIRELESS BROUGHT TO YOU BY  
VIRGIN MOBILE’S RESPONSE TO ORDER DIRECTING FILING REGARDING  
STAFF RECOMMENDATION**

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Comes now Virgin Mobile USA, L.P. d/b/a Assurance Wireless brought to you by Virgin Mobile (“Virgin Mobile”) and hereby responds to the Order Directing Filing (“Order”) issued in this Case on January 30, 2013. The Order notes that the Staff Recommendation filed on January 29, 2013 recommends that Virgin Mobile be granted ETC designation subject to three conditions and asks Virgin Mobile to file a response to the three conditions in the Staff Recommendation. Virgin Mobile responds as follows:

1. Condition 1 requests that Virgin Mobile notify and provide documents to Staff regarding a wide range of litigation matters involving Virgin Mobile or affiliated companies. Virgin Mobile is an affiliate of Sprint Nextel Corporation, a holding company with more than 40,000 employees, more than 55 Million customers and Billions of dollars of revenue annually. Sprint Nextel Corporation is subject to hundreds of lawsuits annually, many of them frivolous, which could potentially trigger a reporting requirement under Condition 1 and inundate Staff with filings from these lawsuits. In this context, Virgin Mobile understands and accepts Condition 1 and will work with Staff to implement a means to satisfy this Condition.

2. Condition 2 relates to Virgin Mobile only using the MoUSF Board-approved form when enrolling Lifeline subscribers in Missouri. Virgin Mobile accepts this condition and will only use the MoUSF Board-approved form when enrolling Lifeline subscribers in Missouri.

3. Condition 3 relates to the name used by Virgin Mobile. Virgin Mobile accepts this condition and will use either its full name or the “d/b/a” (Assurance Wireless brought to you by Virgin Mobile) when enrolling Lifeline subscribers in Missouri.

WHEREFORE, Virgin Mobile has responded to the Order and acknowledged and accepted the conditions in the Staff Recommendation and requests the Commission grant Virgin Mobile’s request for ETC designation expeditiously.

Respectfully submitted,

VIRGIN MOBILE USA, L.P. D/B/A  
ASSURANCE WIRELESS BROUGHT TO  
YOU BY VIRGIN MOBILE

A handwritten signature in black ink, appearing to read "Ken Schiffman", written over a horizontal line.

Kenneth Schiffman, MO Bar # 42287  
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February 13, 2013

## VERIFICATION

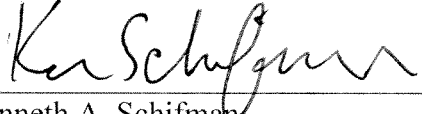
### Declaration of Virgin Mobile USA, L.P.

I, Kenneth Schiffman, do hereby declare under penalty of perjury as follows:

1. I am Senior Counsel and Director for Sprint Nextel Corporation, corporate parent of Virgin Mobile USA, L.P., a Delaware Limited Partnership with its principal place of business at 10 Independence Blvd, Warren, NJ 07059.

2. I have read Virgin Mobile's Response to Order Directing Filing Regarding Staff Recommendation and the foregoing is true and correct to the best of my knowledge.

Executed on February 13, 2013.

  
Kenneth A. Schiffman  
Senior Counsel and Director

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of February, 2013, a copy of the above and foregoing Response to Staff Recommendation was served via electronic mail to each of the following:

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Rhamee Glade