

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

In the Matter of the Provision of Wireless)	
Lifeline Service as an Eligible)	
Telecommunications Carrier by TracFone)	<u>File No. TO-2014-</u>
Wireless, Inc. d/b/a SafeLink Wireless)	

MOTION TO OPEN CASE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and respectfully requests that the Missouri Public Service Commission (“Commission”) open a case in which it may file a Stipulation and Agreement reached through negotiation with TracFone Wireless, Inc. d/b/a SafeLink Wireless (“TracFone”), and states as follows:

1. TracFone is designated as an eligible telecommunications carrier (“ETC”) for purposes of providing wireless Lifeline service in Missouri.

2. In a recent review of a sampling of TracFone’s Lifeline enrollment forms, the Staff found numerous instances in which the forms or methods of verification failed to comply with either the conditions under which TracFone was granted ETC designation or with 4 CSR 240-31.050.

3. TracFone has addressed the Staff’s concerns and has changed its operations in such a way that the Staff believes the Company now complies with the conditions of its ETC designation and Commission rules.

4. TracFone and the Staff have entered into a Stipulation and Agreement in which TracFone agrees, among other things, to maintain such practices as are necessary for continued compliance.

WHEREFORE, the Staff requests that the Commission open a case under the “TO” designation, in which the Staff and TracFone may submit the Stipulation and Agreement for approval. The Staff further requests that this file be “linked” in EFIS to Case No. TA-2009-0327, TracFone’s application for ETC designation.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of July, 2013.