

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

In the Matter of the Application of)
Cricket Communications, Inc.)
for Designation as an Eligible) Case No. TA-2010-0229
Telecommunications Carrier in the State of)
Missouri)

**APPLICATION OF CRICKET COMMUNICATIONS, INC. FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF MISSOURI**

Cricket Communications, Inc. (“Cricket”) respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended (the “Act”),¹ Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”),² 4 CSR 240-2.060 and 4 CSR 240-3.570. Cricket seeks ETC designation solely to provide Lifeline and Link Up service to qualifying Missouri customers. It will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high-cost areas.³

In support of its Application, Cricket states the following:

I. BACKGROUND

Cricket. Cricket is a Delaware corporation whose principal offices are located at 5887 Copley Drive, San Diego, California (CA) 92111.⁴ Cricket is authorized to do business in Missouri, and throughout the requested ETC area, pursuant to a

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.201 *et seq.*

³ Given that Cricket only seeks Lifeline and Link Up support from the low-income program and does not seek any high-cost support, Cricket seeks a waiver of ETC certification requirements for the high-cost program.

⁴ Cricket’s telephone and fax numbers, and email address, are provided below under “Contact Information.”

Commercial Mobile Radio Service (“CMRS”) license granted by the Federal Communications Commission (“FCC”).⁵ Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Good Standing to transact business in Missouri, issued by the Missouri Secretary of State, is attached hereto and incorporated herein by reference as **Exhibit A**. The nature of Cricket’s business is the provision of digital wireless services on a common carrier basis, offering customers unlimited calling at flat rates without requiring a fixed-term contract or a credit check. Directly and through its affiliates, Cricket currently serves approximately 4.6 million customers in 34 states and the District of Columbia.

Contact Information. All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

William D. Steinmeier
William D. Steinmeier, P.C.
P.O. Box 104595
Jefferson City, Missouri (MO) 65110-4595
Telephone: (573) 659-8672
Facsimile: (573) 636-2305
Email: wds@wdspsc.com

With a copy to:

Julie Buechler
Manager Government Programs
Cricket Communications, Inc.
5887 Copley Drive
San Diego, California (CA) 92111
Telephone: (858) 882-9303
Facsimile: (858) 882-9110
Email: jubuechler@cricketcommunications.com

⁵ Cricket’s Missouri FCC licenses are: WQCS465; WQGD474; WQGD673; WQGD677; and WQGD732.

Waivers of Certain PSC Rules. Since Cricket is not seeking high cost support for its wireless service, it requests a waiver of the following rules of the Missouri Public Service Commission in this matter: 4 CSR 240-3.570(2)(A) 1 through 3; 4 CSR 240-3.570(4)(A) 1 through 5; and 4 CSR 240-3.570(4)(B) 1 through 4. Cricket understands these rule provisions to relate solely to the receipt and expenditure of high-cost funds. As Cricket will not apply for or accept federal high-cost funding, the Company believes that these rules are not applicable to Cricket's ETC Application and, therefore, should be waived. In addition, Cricket requests a waiver of 4 CSR 240-3.570(2)(C), as Cricket's network is already operational and largely built out and will negate the possibility of unusual construction and installation and the charges related to the same. Pursuant to 4 CSR 240-2.060(4), Cricket submits that these circumstances constitute good cause for waiver of these rules.

Compliance with Rules. Cricket commits to comply with all applicable rules of the Missouri Public Service Commission and of the Federal Communications Commission unless waived by this Commission or the FCC.

Designation of Eligible Telecommunications Carriers. Sections 214(e) and 254 of the Act expressly authorize the Commission to designate Cricket as an ETC.⁶ More specifically, Section 214(e)(2) of the Act provides that, upon request and consistent with the public interest, convenience, and necessity, the Commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC, provided the requesting carrier: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services.⁷ The FCC's rules, as well as the rules and orders of the Missouri Public Service Commission,

⁶ 47 U.S.C. §§ 214(e), 254.

⁷ 47 U.S.C. § 214(e)(2). See also 47 C.F.R. § 54.201(d).

impose additional requirements on a common carrier seeking designation as an ETC. As demonstrated below, Cricket satisfies each of these requirements.

Scope of Cricket Designation Request. Cricket seeks ETC designation for the purpose of receiving available support from the federal universal service fund (“USF”) for low-income customers only (*i.e.*, Lifeline and Link-Up support). Cricket seeks such designation in its licensed service areas, as shown in **Exhibits B through E**. Cricket’s current coverage in the St. Louis market area is shown on **Exhibit B**, and a list of the wire centers included in the St. Louis market area are shown in **Exhibit C**. Cricket’s current coverage in the Kansas City market area is shown on **Exhibit D**, and a list of the wire centers included in the Kansas City market area is shown on **Exhibit E**.

For the reasons set forth below, designating Cricket as an ETC throughout the requested service areas would serve the public interest, convenience and necessity.⁸

II. CRICKET SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC IN MISSOURI

Cricket satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC’s rules and 4 CSR 240-3.570:

A. Cricket Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program [47 C.F.R. § 54.201(d)]

Cricket provides each of the services supported by federal universal service support mechanisms, as set forth in 47 C.F.R. § 54.101, and will offer these supported services throughout the area in which it is designated as an ETC. Cricket will provide these supported services using its own facilities or a combination of its own

⁸ Pursuant to FCC precedent, no “cream-skimming” analysis is necessary because Cricket is seeking ETC designation only with respect to low-income support mechanisms. See *Virgin Mobile USA, L.P.*, Order, 24 FCC Rcd 3381, at ¶ 39 n.101 (2009).

facilities and the resale of another carrier's service. Cricket primarily will use its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching and interconnection facilities used to serve its existing customers. These supported services include:

Voice Grade Access [47 C.F.R. § 54.101(a)(1)]. "Voice grade access" permits a telecommunications user to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call. Through its interconnection agreements with local exchange carriers ("LECs") in Missouri, Cricket's customers will be able to make and receive calls on the public switched telephone network with a minimum bandwidth of 300 to 3000 Hertz.

Local Usage [47 C.F.R. § 54.101(a)(2); 4 CSR 240-3.570 (2)(A)10]. "Local usage" is an amount of minutes of use of exchange service provided without an additional charge to end users. The FCC has specified that a local usage plan is acceptable if it is "comparable to the one offered by the incumbent LEC in the service areas for which the applicant seeks designation."⁹ This comparability analysis must proceed on a case-by-case basis, and take account of value-added capabilities and services incorporated into a plan.¹⁰ Cricket's current local usage plans, summarized in **Exhibit F**, are comparable in value to those offered by ILECs operating in the requested ETC service area. Cricket's plans offer consumers numerous benefits, including larger "local" calling areas, the availability of mobile service, and unlimited local and long-

⁹ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, at ¶ 32 (2005) ("2005 ETC Order").

¹⁰ *Id.*

distance calling options. In addition, those plans incorporate value-added features, such as caller ID; unlimited domestic text and picture messaging; unlimited text messaging to Mexico; premium extended coverage providing unlimited service without additional roaming fees in over 4,600 domestic cities and towns; and call waiting, three-way calling, and voicemail, among other services.

Dual Tone Multi-Frequency Signaling or its Functional Equivalent [47

C.F.R. § 54.101(a)(3); 4 CSR 240-3.570 (3)(C)1.A.]. Dual tone multi-frequency (“DTMF”) signaling is a method of signaling that facilitates the transportation of call set-up and call detail information. The FCC has recognized that, with respect to wireless carriers, it “is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling.”¹¹ Cricket currently uses out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent to DTMF signaling.

Single-Party Service or its Functional Equivalent [47 *C.F.R. §*

54.101(a)(4); 4 CSR 240-3.570 (3)(C)1.B.]. With respect to wireless carriers, “single-party service” affords a user a dedicated message path for the length of a user’s particular transmission. Cricket meets this requirement with respect to each of its service offerings.

Access to Emergency Services [47 *C.F.R. § 54.101(a)(5); 4 CSR 240-*

3.570 (3)(C)1.C.]. “Access to emergency service” includes access to services, such as 911 and enhanced 911 (“E-911”), provided by local governments or other public safety organizations. Cricket currently provides its voice customers in Missouri with such access, is capable of delivering automatic numbering information (“ANI”) and automatic

¹¹ *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, at ¶ 71 (1997).

location information (“ALI”) over its existing network, and otherwise satisfies applicable state and federal E-911 requirements. Further, Cricket pays all applicable E-911 fees in a timely manner. Cricket will continue to work with local public safety answering points (“PSAPs”) within its ETC service areas to make 911 and E-911 service available to its customers.

Access to Operator Services [47 C.F.R. § 54.101(a)(6); 4 CSR 240-3.570 (3)(C)1.H.]. “Access to operator services” means access to automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call. Cricket meets this requirement by providing access to operator services with respect to billing questions to customers dialing “611,” and access to operator services with respect to call completion to customers dialing “411.”

Access to Interexchange Service [47 C.F.R. § 54.101(a)(7); 4 CSR 240-3.570 (3)(C)1.E.]. With respect to wireless carriers, “access to interexchange service” means access to the functional equivalent of the use of the loop, as well as that portion of the switch that is paid for by the end user, necessary to access an interexchange carrier’s network. Cricket meets this requirement by providing all of its subscribers with the ability to make and receive interexchange or toll calls through Cricket’s network.

Directory Assistance [47 C.F.R. § 54.101(a)(8); 4 CSR 240-3.570 (3)(C)1.G.]. “Access to directory assistance” means access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings. Cricket meets this requirement by providing access to directory assistance to customers dialing “411.”

Toll Limitation [47 C.F.R. § 54.101(a)(9); 4 CSR 240-3.570 (3)(C)1.1.].

“Toll limitation” includes the offering of either “toll control” or “toll blocking” to qualifying low-income customers, as a means of limiting or blocking the completion of outgoing toll calls. An ETC is not required to provide either service if it is incapable of providing such service. Cricket’s calling plans do not distinguish between local and toll calls at the point of dialing, such that Cricket cannot offer toll limitation without blocking all service to a customer. However, if for any reason Cricket changes the structure of its service plans to distinguish between local and toll calls, Cricket will meet the toll limitation requirement by providing toll blocking.

B. Cricket Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings [47 C.F.R. § 54.201(d)(2); 47 CFR §§ 54.405(b) and 54.411(d); 4 CSR 240-3.570(2)(A) 6 and 7]

Cricket will advertise the availability of the supported services detailed above, and the corresponding rates and charges, in a manner designed to reach those likely to qualify for the services within its designated ETC service areas. This advertising will occur through some combination of media of general distribution throughout the ETC service area, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing, and the Internet.

Cricket will work with government agencies that administer the qualifying assistance programs and with social service agencies to ensure that they are aware Cricket is a Lifeline provider. Cricket will provide these agencies with collateral materials outlining the Lifeline program and how to obtain Lifeline discounts. Cricket plans to expand their community outreach program in the counties where ETC designation is being sought. Community events in the areas where potential Lifeline subscribers live will be planned. Direct mailing to the zip codes in the covered areas will also provide

information on the availability of the Lifeline program. Lifeline materials will be available for non-English speaking consumers. Cricket stores and dealers will be furnished with promotional material visible to customers in the stores including posters and counter cards.

Cricket's advertising and outreach plan includes listing with USAC and with any other appropriate agencies. In addition, Cricket will expand its web-site information to include the market sites corresponding to this application for ETC low-income designation.

C. Cricket Will Satisfy its Additional Obligations as an ETC

In addition to those requirements set forth in Section 54.201 of the FCC's rules, Cricket will satisfy other ETC requirements adopted by this Commission and the FCC. In particular:

Commitment to Provide Service Upon Reasonable Request [47 C.F.R. § 54.202(a)(1); 4 CSR 240-3.570(3)(C)3.]. If a request is made by a potential customer within Cricket's existing network coverage, Cricket will provide service immediately using its standard customer equipment (handsets/wireless devices). If a potential customer requests service within Cricket's designated ETC service area, but outside its existing network coverage, Cricket will follow the six-step process specified in 47 C.F.R. § 54.202(a)(1)(i) and comply with 4 CSR 240-3.570 (3)(C)3.B. Specifically, Cricket will determine if service can be provided at reasonable cost by: (i) modifying or replacing the requesting customer's equipment; (ii) deploying a roof-mounted antenna or other equipment; (iii) adjusting the nearest cell tower; (iv) adjusting network or customer facilities; (v) reselling services from another carrier's facilities to provide service; or (vi)

employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. Because Cricket seeks only low-income support, as opposed to high-cost funding to support the construction of network facilities, it is not submitting a network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii).¹²

Ability to Remain Functional in an Emergency [47 C.F.R. § 54.202(a)(2); 4 CSR 240-3.570 (2) (A)4.]. Cricket is committed to providing and maintaining essential telecommunications services in times of emergency. In particular, Cricket maintains a reasonable amount of back-up power to ensure the functionality of its service without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. More specifically, all mobile switching centers and cell sites have battery backup power, each switching center has a dedicated diesel generator, and there are several cell site generators in the market area. In instances of power outages, priority is set based upon traffic, cell site location and time of day. In certain parts of the service area, a cell on wheels (COW) can be deployed. In case of a total switch outage, a mobile command center may be established by each switch vendor.

Satisfaction of Applicable Consumer Protection and Service Quality Standards [47 C.F.R. § 54.202(a)(3); 4 CSR 240-3.570 (2)(A)8 and 10(B).]. Cricket will comply with all applicable state and federal consumer protection and service quality standards. Further, Cricket will abide by CTIA's Consumer Code for Wireless Service ("CTIA Code"). Cricket has already adopted the CTIA Code and is committed to compliance with the CTIA Code throughout its service areas, including in those areas

¹² The FCC has made clear that this requirement applies only to carriers receiving high-cost support. See *2005 ETC Order* at ¶ 23.

where it is seeking designation as an ETC. In particular, Cricket will use its best efforts to resolve complaints received by the Commission, and commits to maintain a record of customer complaints. Cricket designates the following contact person to work with Commission Staff to resolve any complaints or other compliance matters:

Leticia Grajiola
Corporate Relations Supervisor
Cricket Communications, Inc.
6380 South Fiddlers Green Circle
Greenwood Village, CO 80111
(720) 374-2855 (telephone)
(720) 374-9125 (facsimile)
governmentinquiry@cricketcommunications.com

In compliance with 4 CSR 240-3.570 (2)(A)10.(B), a copy of the consumer code for wireless service currently recognized by CTIA, to which Cricket commits to abide, is attached to this Application as **Exhibit G**.

Billing Requirements [4 CSR 240-3.570 (3)(A) and (B)]. Cricket will comply with the specific requirements of the Commission's rules in developing a bill design that can be easily interpreted by Cricket's customers and which clearly sets forth charges in compliance with state and federal billing requirements. Further, Cricket will provide customer service contact information on-line and on billing statements.

Consumer Privacy Protection Standards [4 CSR 240-3.570 (2)(A)8]
Cricket commits to satisfy all consumer privacy protection standards as provided in 47 CFR § 64 Subpart U and service quality standards, as applicable.

Local Usage Plan [47 C.F.R. § 54.202(a)(4); 4 CSR 240-3.570 (2)(A)10].
As discussed above and in **Exhibit F**, Cricket offers several local usage plans to customers. These plans, which will be available to low-income customers, are

comparable to those offered by ILECs in the service areas for which Cricket seeks ETC designation.

Equal Access [47 C.F.R. § 54.202(a)(5); 4 CSR 240-3.570 (2)(A)9.]

Cricket acknowledges that it shall provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

Lifeline Certification and Verification [47 C.F.R. § 54.410; 4 CSR 240-

3.570 (5)(B)]. Cricket will certify and verify consumer eligibility to participate in the Lifeline and Link-Up programs in accordance with the rules of this Commission and the FCC.

Regulatory Fees. Cricket pays all applicable federal, state, and local

regulatory fees, including but not limited to universal service and E-911 fees, in a timely manner.

711 Relay Access [4 CSR 240-3.570 (3)(C)1.F.]. Cricket will provide

customers with access to telecommunications relay services by dialing 711. All 711 calls in both the Kansas City and St. Louis market areas of Cricket will be routed to the Relay Center.

Notify Commission of Changes to Contact Information [4 CSR 240-

3.570(3)(F)]. Cricket will, within 10 days of a change in the company-designated contacts, either notify the manager of the Telecommunications Department, in writing or by electronic mail, or shall update the Commission's electronic filing system. The notification or update shall include the names, addresses, and/or telephone numbers of the designated individuals.

Informational Filing [4 CSR 240-3.570(3)(D)]. Within 30 days of receiving Commission approval of this Application, Cricket will make an informational filing which describes the terms and conditions of the wireless offerings for which it will seek USF support, and it will amend that filing as its service offerings evolve.

Missouri Application Requirements [4 CSR 240-2.060(1)(K) and (L)]. Cricket has no pending or final judgments or decisions against it from any state or federal agency or court that involve customer rates or service. In addition, Cricket has no annual report or assessment fees that are overdue.

D. Cricket Lifeline and Link Up Plans and Discounts

Cricket commits to provide Lifeline and Link Up discounts consistent with 47 CFR 54.401 and 47 CFR 54.411, as required by 4 CSR 240-3.570(2)(A)7.

Lifeline [47 CFR § 54.401; 4 CSR 240-3.570(2)(A)7]. Cricket will ensure that its Lifeline customers in the Cricket ETC service area will receive 100% of the Lifeline reimbursement in universal service support funding that Cricket receives. Upon designation as an ETC, Cricket anticipates it will receive the following USF Lifeline support, which the Company will provide to eligible Missouri consumers as a Lifeline discount:

Tier 1: \$6.50 in non-AT&T Missouri exchanges.

\$5.31 in AT&T Missouri exchanges.

Tier 2: \$1.75

Tier 3: \$1.75

Since wireless carriers do not qualify for the State's \$3.50 contribution to the Tier 2 reimbursement, Cricket will provide that discount to its Lifeline customers at

its own cost. Thus, the discounts offered to Cricket's Lifeline customers will be \$13.50 in non-AT&T Missouri exchanges, and \$12.31 in AT&T Missouri exchanges.

These discount amounts will be deducted from the monthly service plan charge selected by the Cricket Lifeline customer (per **Exhibit F**). Thus, a Lifeline customer with a \$30 a month service plan from Cricket would pay \$16.50 per month in a non-AT&T exchange, and \$17.69 in an AT&T exchange.

Link Up [47 CFR § 54.411; 4 CSR 240-3.570(2)(A)7]. Cricket will use Link Up support to reduce the Company's customary charge for commencing service by half of the customary charge, as provided by 47 CFR § 54.411. Thus, Cricket's customary connection charge of \$15.00 will be reduced to \$7.50 for Link Up customers.

III. DESIGNATING CRICKET AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST

Designating Cricket as an ETC will be consistent with the public interest, convenience and necessity, and will serve the needs of low-income customers in Missouri. Cricket has specifically tailored its wireless service plans to share the benefits of wireless telecommunications with underserved customers who have been left behind by other providers. Cricket offers unlimited voice service at affordable rates starting as low as \$30 per month and unlimited broadband starting at \$35 per month, without the typical strings attached (such as credit checks, long-term commitments, and early termination fees) that otherwise prevent many economically disadvantaged customers from obtaining wireless services. With this foundation of simplicity and affordability as its business model, Cricket and its joint venture partners have built a network covering an area with a population of 92 million individuals in 34 states and the District of

Columbia, and are steadily expanding into new communities where the telecommunications needs of consumers are not being met by existing providers.

Cricket fulfills a critical role in the marketplace by ensuring that many Americans who cannot qualify for, or afford, the services provided by other wireless providers can still enjoy the benefits of wireless telecommunications, including wireless broadband. Cricket's flat-rate, unlimited service model is ideal for many consumers on a limited budget; other carriers often impose hefty overage charges if consumers exceed their usage limit. Many consumers cannot even qualify for service from other providers because of creditworthiness concerns or the inability to commit to a long-term contract.

As a result, Cricket's current customer base of approximately 4.6 million customers is quite unlike those of other wireless providers. Notably, approximately 80 percent of Cricket's customers have annual household incomes of less than \$50,000 and 55 percent have annual household incomes of less than \$30,000. In contrast, just 48 percent of other wireless carriers' customers have annual household incomes of less than \$50,000. The usage patterns of Cricket's customers also are distinct. Ninety percent of Cricket's subscribers use the service for their primary phone (compared to an industry average of 50 percent), and 68 percent do not have a traditional landline phone service at home (compared to an industry average of 15 percent). Cricket's customers also use an average of approximately 1500 minutes per month—almost twice as many minutes per month as the industry average.

These figures reveal that Cricket reaches market segments that other carriers have ignored, and its customers look to Cricket for all of their

telecommunications needs, including an entrance to the online world. In fact, nearly 50 percent of customers subscribing to Cricket's flat-rate wireless broadband service have never had Internet access at home—not even dial-up. Designating Cricket as an ETC will improve its ability to serve these customers, and thus will serve the public interest.

IV. CONCLUSION

WHEREFORE, Cricket Communications, Inc. respectfully submits that it has met the requirements for eligibility for designation as an Eligible Telecommunications Carrier (ETC) in the State of Missouri. Cricket requests that the Missouri Public Service Commission issue an Order granting this Application and designating Cricket as an ETC for Lifeline and Link Up services in Missouri.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier, MoBar #25689

WILLIAM D. STEINMEIER, P.C.

2031 Tower Drive

P.O. Box 104595

Jefferson City MO 65110-4595

Telephone: 573-659-8672

Facsimile: 573-636-2305

Email: wds@wdspsc.com

COUNSEL FOR CRICKET
COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov and on the General Counsel's office at gencounsel@psc.mo.gov this 4th day of February 2010.

/s/ William D. Steinmeier

William D. Steinmeier

CRICKET COMMUNICATIONS, INC.

ETC APPLICATION

LIST OF EXHIBITS

Verification	<i>Attached below.</i>
Exhibit A	Missouri Secretary of State Certificate of Good Standing (attached in separate pdf file)
Exhibit B	Map of Cricket Communications St. Louis Area Coverage (attached in separate electronic file)
Exhibit C	List of Wire Centers in Cricket St. Louis Market Area (attached in separate electronic file)
Exhibit D	Map of Cricket Communications Kansas City Area Coverage (attached in separate electronic file)
Exhibit E	List of Wire Centers in Cricket Kansas City Market Area (attached in separate electronic file)
Exhibit F	Chart of Cricket Local Usage Plans – <i>Attached below.</i>
Exhibit G	CTIA Consumer Code for Wireless Service (attached in separate pdf file)

VERIFICATION

William Ingram, being first duly sworn, deposes and says: That he is the Senior Vice President of Strategy of Cricket Communications, Inc., the Applicant in the foregoing Application; that he has read the foregoing Application, knows the contents thereof and is authorized to verify the accuracy of same; and that the statements contained in the Application are true to his best knowledge, information and belief.



William Ingram
Senior Vice President, Strategy
Cricket Communications, Inc.

SUBSCRIBED AND SWORN to me this 19th day of January, 2010.

See Attached

Notary Public

CALIFORNIA JURAT WITH AFFIANT STATEMENT

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

1 _____

2 _____

3 _____

4 _____

5 _____

6 _____

Signature of Document Signer No. 1 _____ Signature of Document Signer No. 2 (if any) _____

State of California
 County of San Diego

Subscribed and sworn to (or affirmed) before me on this
19th day of January, 2010, by
Date Month Year
 (1) William Ingram
Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me. (X)

(and

(2) _____
Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me.)

Signature Mary E. Ferris
Signature of Notary Public



Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: Verification

Document Date: Jan. 19, 2010 Number of Pages: 18 r CA Jurat

Signer(s) Other Than Named Above: n/a

RIGHT THUMBPRINT OF SIGNER #1
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RIGHT THUMBPRINT OF SIGNER #2
 Top of thumb here

Exhibit F: Cricket Local Usage Plans

Amount	\$30	\$35	\$40	\$45	\$50	\$60
Content						
Voice						
Unlimited Local	X	X	X	X	X	X
Unlimited LD	\$5	X	X	X	X	X
Extended Calling (NECA)	X	X	X	X	X	X
Premium Extended Coverage	\$5	\$5	\$5	X	X	X
Voice Features						
CI	X	X	\$0	\$0	\$0	\$0
VM, CI, CW, 3-Way	\$5	\$5	X	X	X	X
CF	\$5	\$5	\$5	\$5	X	X
Caller ID Blocking	\$0	\$0	\$0	\$0	\$0	\$0
Messaging						
Unlimited Text	\$5	X	X	X	X	X
Unlimited Picture	\$3	\$3	X	X	X	X
Unlim Mexico Text	\$3	\$3	X	X	X	X
Unlim Intl Text	\$5	\$5	\$5	\$5	X	X
Premium Services						
Brew	X	X	X	X	X	X
WAP	\$5	\$5	\$5	X	X	X
Unlimited DA	\$2	\$2	\$2	X	X	X
RBT	\$5	\$5	\$5	\$5	\$5	\$5
Handset Insurance	\$4.95	\$4.95	\$4.95	\$4.95	\$4.95	\$4.95
E-mail	\$5	\$5	\$5	\$5	X	X
Data Backup	\$2	\$2	\$2	\$2	X	X
Mobile Video	\$5	\$5	\$5	\$5	\$5	\$5
Premium Voice Services						
Roaming Plan Minutes (30)	NA	NA	NA	NA	X	NA
Roaming Plan Minutes (200)	NA	NA	NA	NA	NA	X