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To: Filings@psc.state.fl.us
Subject: Amended Petition of Virgin Mobile USA - Docket No. 090245-TP
Attachments: Amended Petition.pdf

On behalf of Virgin Mobile USA, L.P., enclosed please find an Amended Petition for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Offering Lifeline Services in the State of Florida (39 pages).

Should you have any questions regarding the attached, please contact the undersigned.

Respectfully submitted.

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02456 APR-20

FPSC-COMMISSION CLERK

4/2/2010

**Before the
FLORIDA PUBLIC SERVICE COMMISSION**

_____)	
In the Matter of)	
Virgin Mobile USA, L.P.)	Docket No. <u>090245-TP</u>
Amended Petition for Designation as an)	
Eligible Telecommunications Carrier)	
for the Limited Purpose of Offering)	
Lifeline Services)	
_____)	

**AMENDED PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
FOR THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICES**

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April 1, 2010

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SUMMARY

Virgin Mobile USA, L.P. (“Virgin Mobile” or the “Company”), a wholly owned subsidiary of Sprint Nextel Corporation, is filing this amended petition for designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Florida, pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (“Act”), and sections 364.011 and 364.10 of the Florida Statutes, for the limited purpose of offering prepaid wireless services supported by the Universal Service Fund’s (“USF”) Lifeline program. Virgin Mobile is not seeking ETC designation to access USF high-cost funding. As such, this amended petition is consistent with the Company’s original request for ETC designation. The instant request, however, provides additional information regarding the Company’s recent merger with Sprint Nextel Corporation and its resulting operational status as a facilities-based carrier in the State of Florida.

The Company meets all of the necessary requirements for ETC designation under section 214(e)(1) of the Act to offer services supported by the Lifeline program. Designation of the Company would promote the public interest because it would provide qualifying Florida customers with lower prices and higher quality wireless services. Many low-income customers in Florida have yet to benefit from the intensely competitive wireless market because of financial constraints, poor credit history or intermittent employment and many existing customers lose access to wireless services when their financial position deteriorates as a consequence of losing a job, a medical condition or any other adverse event—all unfortunately too common during a challenging economic period. Virgin Mobile’s prepaid service offerings are ideally suited to provide these customers with reliable and free wireless services. As an ETC, Virgin Mobile would be able to provide affordable services to these consumers—many of whom are among the intended beneficiaries of USF support.

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**AMENDED PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
FOR THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICES**

I. INTRODUCTION

Virgin Mobile USA, L.P. ("Virgin Mobile" or the "Company"), by undersigned counsel, and pursuant to section 214(e)(2) of the Communications Act of 1934, as amended ("Act"), 47 U.S.C. § 214(e)(2), and sections 364.011 and 364.10 of the Florida Statutes,¹ hereby petitions the Florida Public Service Commission ("Commission") for designation as an eligible telecommunications carrier ("ETC") in the State of Florida.² Virgin Mobile seeks ETC designation in Florida only for purposes of participation in the Universal Service Fund's ("USF") Lifeline program. The instant request does not seek ETC designation to offer services supported by the high-cost program. As such, this amended petition is consistent with the Company's original request for ETC designation. The instant request, however, provides additional

¹ See FL. STAT. ch. 364.011, 364.10.

² The instant request for ETC designation replaces the petition that Virgin Mobile originally filed with the Commission on April 29, 2009. While the Company is concurrently withdrawing that request, it respectfully requests that all information provided by the Company to the Commission and its staff during the review of the initial petition be incorporated into the review of the instant request.

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information regarding the Company's recent merger with Sprint Nextel Corporation and its resulting operational status as a facilities-based carrier in the State of Florida.

Rapid grant of Virgin Mobile's request would advance the public interest because it would enable the Company to commence much needed Lifeline services to lower-income Florida residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve the instant ETC designation petition.

II. BACKGROUND

A. Company Overview

Virgin Mobile was established as a joint venture between Sprint Nextel Corporation and Sir Richard Branson's Virgin Group to offer prepaid wireless services using the Virgin Mobile brand and the nationwide Sprint network. On November 24, 2009, Virgin Mobile became a wholly owned subsidiary of Sprint Nextel upon completion of the companies' previously announced transaction.³ The FCC approved Sprint Nextel's acquisition of Virgin Mobile effective September 11, 2009.⁴ As a result of the Company's acquisition by Sprint Nextel, Virgin Mobile no longer resells Sprint's services to customers. Instead, the Company now operates as a facilities-based carrier in the State of Florida like all other Sprint Nextel subsidiaries operating in the state.

The Company's innovative prepaid plans without annual contracts, along with its differentiated service offerings and high-quality customer service, have redefined the prepaid wireless marketplace and brought significant competition to the overall wireless market. Virgin

³ An organizational chart of the Company is attached hereto as Exhibit 2

⁴ See *International Authorizations Granted*, Public Notice, DA 09-2071 (rel. Sept. 17, 2009).

Mobile's value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly buckets of minutes in advance. The Company also offers text and multimedia messaging and an array of mobile entertainment and information services, including music, games and graphics on all handsets.

Unlike many carriers, Virgin Mobile does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Many customers are from lower-income backgrounds and did not previously enjoy access to an attractive, comprehensive and high-quality wireless service because of financial constraints or poor credit history. Virgin Mobile estimates that approximately one-third of its present customers are new to wireless services and 35 percent have an annual household income below \$35,000. Many of these customers also use Virgin Mobile's services sparingly, with a substantial percentage spending less than \$10 per month. By marketing and expanding the availability of appealing wireless services to consumers otherwise unable to afford them, and those previously ignored by traditional carriers, Virgin Mobile has effectively expanded access to wireless services. Unfortunately, during this challenging economic period, many existing customers have to forgo access to wireless services entirely when their financial position deteriorates, making it more difficult for prospective employers and dependent family members to reach them and losing wireless access to emergency services.

B. Previous ETC Designations

The Federal Communications Commission ("FCC") previously designated Virgin Mobile as an ETC for purposes of offering Lifeline services in the states of New York, North Carolina,

Tennessee and Virginia.⁵ In approving the Company's requests, the FCC determined that Virgin Mobile would "offer Lifeline-eligible consumers a choice of providers for accessing telecommunications services not available to such consumers today" and "expand participation of qualifying consumers" in the Lifeline program—a longstanding goal.⁶ In light of these significant benefits, the FCC concluded that limited designation of Virgin Mobile as an ETC was in the public interest.⁷

As discussed above, prior to the November 24, 2009 acquisition of Virgin Mobile by Sprint Nextel, Virgin Mobile operated as a reseller, or mobile virtual network operator, that did not own any network facilities. Based on Virgin Mobile's pre-merger status, the Commission's grant of ETC designation to the Company for the states of New York, North Carolina, Tennessee and Virginia was approved in connection with the Company's request for forbearance from the facilities-based requirement contained in section 214(e)(1)(A) of the Act. Because Virgin Mobile was a reseller at the time of the Commission's action, the FCC conditioned its grant of forbearance, as well as its grant of ETC designation, on Virgin Mobile's compliance with certain requirements aimed at enhancing Lifeline customers' access to public safety services and preventing misuse of the Company's Lifeline offering. These conditions included the following:

(a) providing Lifeline customers with 911 and enhanced 911 ("E911") access immediately upon commencement of service and regardless of activation status or the availability of prepaid

⁵ See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, FCC 09-18 (rel. March 5, 2009) ("Order"). Virgin Mobile has also been designated an ETC in the State of Michigan. See *In the Matter of the Application of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Telecommunications Act of 1996*, Case No. U-15966, Opinion and Order (Dec. 1, 2009), modified, Order (March 18, 2010).

⁶ Order at ¶¶ 21, 30.

⁷ See Order at ¶ 29.

minutes; (b) offering E911-compliant handsets to new Lifeline customers upon activation of service and replacing any non-compliant handsets, at no additional charge, for existing customers who obtain Lifeline service; (c) obtaining a certification from each Public Safety Answering Point (“PSAP”) whose territory overlaps with Virgin Mobile’s Lifeline service area, confirming that the Company provides its customers with 911 and E911 service or if, within 90 days of a request for certification, a PSAP has neither provided the certification nor affirmatively determined that Virgin Mobile does not provide its customers with access to 911 and E911, self-certifying that Virgin Mobile meets the 911 and E911 requirements; (d) requiring customers to self-certify under penalty of perjury upon service activation and annually thereafter that they are the head of their household and receive Lifeline-supported service only from Virgin Mobile; and, (e) establishing applicable safeguards to prevent its customers from activating multiple Lifeline accounts, including tracking each Lifeline customer’s primary residential address.⁸ The FCC recently approved the Company’s plan describing the measures it would undertake to implement each of these conditions for the first four states in which it received ETC designation.⁹

C. The Commission Has the Authority to Perform ETC Designations

The Commission has the requisite authority to perform the limited ETC designation requested herein. Section 214(e)(2) of the Act provides state public utility commissions (“PUCs”) with the “primary responsibility” for the designation of ETCs.¹⁰ Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC

⁸ See Order at ¶ 12.

⁹ See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, DA 09-2344 (rel. Oct. 29, 2009).

¹⁰ 47 U.S.C. § 214(e)(2).

status to an applying carrier, including wireless carriers. Under the Act, a state (“PUC”) with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of section 214(e)(1). By offering all of the services supported by the federal USF and advertising the availability of such services, Virgin Mobile currently meets all of the requirements of section 214 of the Act, warranting its designation as an ETC by the Commission.

III. VIRGIN MOBILE REQUESTS ETC DESIGNATION IN ITS FLORIDA SERVICE AREA FOR PARTICIPATION IN THE LIFELINE PROGRAM

A. ETC Designated Territory

As a non-rural carrier, Virgin Mobile is required to describe the areas within which it requests ETC designation. The Company requests ETC designation in the wire centers attached hereto as Exhibit 3. Virgin Mobile understands that its service area overlaps with several rural and non-rural carriers’ service areas, but Virgin Mobile only seeks designation for purposes of participation in the Lifeline program. Designation of Virgin Mobile as an ETC for Lifeline purposes will not affect the USF high-cost funding available to any of these carriers. For these reasons, designation of Virgin Mobile as an ETC in these areas will serve the public interest.

Virgin Mobile also recognizes that its requested ETC designated service territory overlaps with the designated service territories of certain of its Sprint Nextel corporate affiliates operating in Florida.¹¹ Separate designation of Virgin Mobile as an ETC in these territories is

¹¹ These affiliates were designated under federal law as ETCs in Florida by the FCC. *See In the Matter of Federal State Joint-Board on Universal Service, Sprint Corporation Applications for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Florida, Georgia, New York, North Carolina, Tennessee and Virginia*, 19 FCC Rcd 22,663 (2004); *See In the Matter of Federal State Joint-Board on Universal Service, NPCR, Inc. d/b/a Nextel Partners Applications for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Florida, Georgia, New York, Pennsylvania, Tennessee and Virginia*, 19 FCC Rcd 16,530 (2004).

necessary to limit the Company's ETC authority to offering Lifeline services.¹² Separate designation is also necessary because Virgin Mobile is the specific entity that will provide Lifeline services in Florida. Without stand-alone designation, Virgin Mobile may be prohibited from offering Lifeline services in Florida. In addition, the use of a variety of different designated entities would increase costs and decrease the value of the services offered to low-income customers in Florida.

B. Virgin Mobile Requests ETC Designation for Participation in the Lifeline Program

Virgin Mobile requests ETC designation in Florida for the sole purpose of participating in the Lifeline program as a prepaid wireless carrier. Virgin Mobile will not seek to provide services supported by the USF's high-cost program. As more fully described below, the instant request to participate in the Lifeline program promotes the goals of universal service and offers many benefits to low-income customers in the State of Florida. The Lifeline services provided by Virgin Mobile will contain many features specifically designed for qualifying customers. Indeed, Virgin Mobile's Lifeline plans will provide affordable and convenient wireless services to qualifying Florida customers, many of whom are otherwise unable to afford wireless services.

Virgin Mobile's designation as an ETC solely for Lifeline purposes also would not unduly burden the USF or otherwise reduce the amount of funding available to other carriers. The secondary role of Lifeline support with respect to overall USF expenditures is well documented. According to the most recent monitoring report released by the Federal-State Joint Board on Universal Service, Lifeline funding represented approximately 10% of total USF

¹² The FCC grant of authority to Sprint Nextel permitted the operating affiliates specifically listed in the designations to provide all forms of USF-supported services, including high-cost services, in Florida.

expenditures in 2008.¹³ The FCC, itself, concluded that designation of Virgin Mobile as an ETC would result only in a “minimal” increase in USF funding.¹⁴

The nature by which Lifeline support is provided to wireless carriers also obviates any concerns that multiple ETC designations in Florida would have a negative impact on the USF. Lifeline support is provided on a customer-specific basis, and only after a carrier has acquired and begun to serve an eligible customer does the carrier receive Lifeline support for that customer. By tying support to actual service of a customer, moreover, the Lifeline program ensures that USF support only funds the carrier that actually “wins” the customer’s service. This program feature eliminates the potential for duplicative funding, a problem that has plagued the high-cost system.

C. Description of Prepaid Lifeline Offering

Virgin Mobile has branded its prepaid Lifeline service “Assurance Wireless Brought To You By Virgin Mobile.” The service will provide customers with the same features and functionalities enjoyed by all other Virgin Mobile prepaid customers, with one notable exception: prepaid Lifeline services will be free of charge. Under the current plan, eligible customers will receive 200 anytime prepaid minutes per month at no charge with additional service priced at \$0.10/minute and \$0.15/text message.¹⁵ In addition to free voice services, prepaid Lifeline customers also will have access to a variety of other standard features at no additional charge, including voice mail, caller I.D. and call waiting services. New customers

¹³ See *Universal Service Monitoring Report*, CC Docket 98-202, Table 2.2 (filed Jan. 13, 2010).

¹⁴ See *Order* at ¶ 24.

¹⁵ Virgin Mobile expects that the Company’s Lifeline plan may change as the wireless market evolves. As such, the Company requests that the Commission’s grant of ETC designation provide it with the requisite authority to modify the parameters of the offering as marketplace conditions develop.

may elect to receive a free Assurance Wireless-branded handset with E911 functionality.

Current Virgin Mobile customers will be able to use their existing handsets to receive prepaid Lifeline services, or may elect to receive a free Assurance Wireless handset.

D. Applicability of Forbearance Conditions

Prior to the November 24, 2009 acquisition of Virgin Mobile by Sprint Nextel, Virgin Mobile operated as a wireless reseller that did not own any network facilities. Based on Virgin Mobile's pre-merger status, the FCC's March 5, 2009 grant of ETC designation to the Company for the initial four states was approved in connection with the Company's request for forbearance from the facilities-based requirement contained in section 214(e)(1)(A) of the Act. Because Virgin Mobile was a reseller at the time of the *Order*, the FCC imposed a variety of conditions on its grant of forbearance and ETC designation, including Virgin Mobile's compliance with certain requirements aimed at enhancing Lifeline customers' access to public safety services and preventing misuse of the Company's Lifeline offering. Included among these conditions was a requirement that the Company, as a non-facilities-based carrier, obtain a certification from each PSAP whose territory overlaps with Virgin Mobile's service area, confirming that the Company provides its customers with 911 and E911 service or if, within 90 days of a request for certification, a PSAP has neither provided the certification nor affirmatively determined that Virgin Mobile does not provide its customers with access to 911 and E911, self-certify that it meets the 911 and E911 requirements. Virgin Mobile voluntarily committed to complying with this condition for the initial four states approved in connection with the Company's forbearance

request. . The FCC has approved the Company's plan to comply with these conditions for these states.¹⁶

In light of the recent acquisition by Sprint Nextel, Virgin Mobile respectfully submits that the foregoing condition regarding PSAP certification is inapplicable to the instant request of Virgin Mobile as a facilities-based provider. As a matter of statutory construction and regulatory policy, there is no rational basis for the Commission to impose conditions that the FCC specifically stated would apply to any "prepaid wireless reseller" that sought ETC designation for purposes of providing Lifeline services.¹⁷ Because the Commission has the "primary responsibility" for the designation of ETCs in Florida pursuant to section 214(e)(2) of the Act, and the condition precedent for the imposition of the PSAP certification requirement does not exist, the Commission has the necessary authority to designate Virgin Mobile as an ETC without imposing the PSAP certification requirement. Indeed, the Michigan Public Service Commission recently considered this issue and designated Virgin Mobile as a facilities-based ETC under section 214(e)(1)(A) of the Act without imposing any requirement for the Company to obtain PSAP certifications.¹⁸

Given that the Company no longer operates as a reseller of telecommunications services, the rationale underlying imposition of the condition no longer exists. The FCC, itself, noted in its *Order* that the conditions related to emergency services, including the PSAP certification

¹⁶ See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, DA 09-2344 (rel. Oct. 29, 2009).

¹⁷ *Order* at ¶ 27.

¹⁸ *In the Matter of the Application of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Telecommunications Act of 1996*, Case No. U-15966, *Order* (March 18, 2010).

requirement, applied only to wireless resellers—not facilities-based providers.¹⁹ Virgin Mobile’s ability to provide Lifeline-supported services over an existing, owned and operated network infrastructure in Florida eliminates any policy need for the Commission to impose these conditions in connection with the instant request. Virgin Mobile is no more subject to these conditions for the instant request than the other facilities-based wireless carriers that have recently sought ETC designation from the Commission for the purposes of offering services supported by the low-income program.²⁰

Applicability of this condition to facilities-based wireless providers would hinder the broader deployment of Lifeline services—without any attendant benefits for consumers. Indeed, by adding an unnecessary requirement, the condition would serve only to harm customers by increasing the costs and delays associated with the deployment of wireless Lifeline services. Complying with this condition in the states where Virgin Mobile has launched Lifeline service has imposed significant cost on the Company, forcing it to redirect financial resources that otherwise would have been used to develop and market its Lifeline services. Accordingly, Virgin Mobile respectfully submits that application of the prior condition related to PSAP certification to the instant request would harm the public interest.

IV. VIRGIN MOBILE SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 214(e)(1) of the Act requires that applicants for ETC designation be common carriers that will offer all of the services supported by the USF, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services. Applicants

¹⁹ See Order at ¶¶ 22, 27.

²⁰ See e.g., *Petition of DPI Teleconnect, LLC for Supplemental Authority*, Docket No. 080043-TX (filed Feb. 8, 2010).

must also commit to advertise the availability and rates of such services.²¹ As detailed below, Virgin Mobile satisfies each of the above-listed requirements.

A. Virgin Mobile Is a Common Carrier

Section 153(10) of the Act defines a common carrier as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio ...”²² The FCC has determined on numerous occasions that providers of mobile wireless services shall be treated as common carriers for regulatory purposes. As a provider of wireless telecommunications services, therefore, Virgin Mobile is a common carrier eligible for designation as an ETC.

B. Virgin Mobile Will Provide the Supported Services

As described above, Virgin Mobile is a wholly owned subsidiary of Sprint Nextel. Accordingly, Virgin Mobile is capable of, and currently provides, the supported services over an existing network infrastructure in Florida. Virgin Mobile’s request for ETC designation complies with section 214(e)(1) of the Act because it provides all of the services and functionalities supported by the universal service program as set forth in section 54.101 of the FCC’s regulations throughout its service territory in the State of Florida. The Company, moreover, will make these services and functionalities available to any qualifying Florida customer in the Company’s service area.

1. Voice Grade Access to the Public Switched Telephone Network

²¹ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d).

²² 47 U.S.C. § 153(10).

Virgin Mobile provides voice grade access to the public switched telephone network (“PSTN”) and offers its customers services at bandwidth rates between 300 and 3,000 MHz as required by the FCC’s regulations.²³

2. Local Usage

As part of the voice grade access to the PSTN, an ETC must provide local calling services to its customers. Neither the FCC’s nor the Commission’s regulations require ETCs to offer a specific amount of local usage or mandate that ETCs provide a minimum number of free local calls or minutes. Instead, an applicant for ETC designation must demonstrate that it offers a local usage plan that is “comparable” to the plan offered by the ILEC in the relevant service territory.²⁴ In analyzing whether an ETC applicant’s plan is comparable to the underlying ILEC’s plan, the Commission has indicated that it reviews all aspects of the plan on a case-by-case basis. For its part, the FCC has determined that a carrier satisfies the local usage requirements when it offers customers rate plans containing varying amounts of local usage.²⁵

Not only will Virgin Mobile’s offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. Contrary to the ILECs’ plans, Virgin Mobile will offer customers a certain amount of service free of charge. As discussed above, Virgin Mobile will provide its Lifeline customers with approximately 200 anytime minutes per month at no charge. Contrary to the ILEC plans, which contain relatively small local calling areas, Virgin Mobile customers can use these free minutes to place calls statewide (or even nationwide)

²³ See 47 U.S.C. § 54.101(a)(1).

²⁴ 47 C.F.R. § 54.202(a)(4).

²⁵ See e.g., *Farmers Cellular, Inc.*, 18 FCC Rcd 3848, 3852 (2003); *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc.*, 17 FCC Rcd 9589, 9593 (2002); *Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 52 (2000).

because Virgin Mobile does not constrict customers' use by imposing a local calling area requirement. In addition to free voice services, Virgin Mobile will provide Lifeline customers with access to a variety of other features at no cost, including voice mail, caller I.D., call waiting services and enhanced 911 ("E911") capabilities. Most important, Virgin Mobile's Lifeline service will provide low-income Florida residents with the convenience and security offered by wireless services without interruption—even if their financial position deteriorates.

3. DTMF Signaling or its Functional Equivalent

Virgin Mobile provides dual tone multi-frequency ("DTMF") signaling to expedite the transmission of call set up and call detail information throughout its network. All wireless handsets offered for sale by the Company are DTMF-capable.

4. Single-Party Service or its Functional Equivalent

"Single-party service" means that only one party will be served by a subscriber loop or access line during a telephone transmission. Virgin Mobile provides the functional equivalent of single-party service to its wireless customers for the duration of each telephone call, and does not provide multi-party (or "party-line") services.

5. Access to Emergency Services

Virgin Mobile provides nationwide access to 911 emergency services for all of its customers. Virgin Mobile also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

6. Access to Operator Services

Virgin Mobile provides all of its customers with access to operator services.

7. Access to Interexchange Services

Virgin Mobile's service provides its customers with the ability to make interexchange, or long distance, telephone calls. Domestic long distance capabilities are included in Virgin Mobile's service with no additional charges because minutes for local or domestic long distance services are not billed separately at different rates.

8. Access to Directory Assistance

All Virgin Mobile customers are able to dial "411" to reach directory assistance services from their wireless handsets.

9. Toll Limitation

Toll limitation allows customers to either block the completion of outgoing long distance calls or specify a certain amount of toll usage to prevent them from incurring significant long distance charges and risking disconnection. As described above, Virgin Mobile provides its wireless service on a prepaid, or pay-as-you-go, basis. Virgin Mobile's service, moreover, is not offered on a distance-sensitive basis and minutes are not charged separately for local or domestic long distance services. Customers also must specifically authorize access for international services, for which additional charges may apply. The FCC determined in its previous grant of ETC designation that the nature of Virgin Mobile's service mitigates concerns that low-income customers will incur significant charges for long distance calls, risking disconnection of their service.²⁶

C. Functionality in Emergency Situations

As a wholly owned subsidiary of Sprint Nextel, Virgin Mobile is able to remain functional in emergency situations as required by section 54.202(a)(2) of the FCC's

²⁶ See Order at ¶ 34.

regulations.²⁷ Sprint Nextel has established a variety of internal programs, policies and teams dedicated to analyzing, assessing and responding to emergency situations. These programs, policies and teams ensure the timely and effective deployment of Sprint Nextel's products and services to allow the public and private sectors to function in emergency situations. Indeed, Sprint's network is monitored 24 hours a day, 7 days a week, 365 days a year by its network monitoring centers. Local switching offices staffed by trained technicians and management coordinate with these larger operation centers, to ensure that Sprint's networks are properly maintained and network performance is at expected levels.

In addition, Sprint has reasonable amounts of back-up power to ensure functionality without an external power source, and has implemented reasonable practices to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. Each cell site in the Sprint network is equipped with battery back-up power. The company also is capable of rerouting traffic around damaged facilities. Many cell sites in the Sprint network provide overlapping coverage for neighboring areas, and such design redundancy ensures that coverage continues in the event of damage to a particular facility. In the event of a major failure of a cell site, neighboring sites could be adjusted to provide coverage to a wider service area. These practices significantly reduce the chance that emergencies, fiber cuts or equipment failure will result in a loss of service.

D. Advertising of Supported Services

Virgin Mobile will advertise the availability and rates for the services described above using media of general distribution in conformance with section 214(e)(1)(B) of the FCC's

²⁷ See 47 C.F.R. § 54.202(a)(2).

regulations.²⁸ The Company advertises the availability of its services through newspapers, magazines, radio, the Internet, billboards and television. Virgin Mobile's third-party retail partners also heavily promote its services. These advertising campaigns have been highly effective in reaching low-income customers and promoting the availability of cost-effective wireless services to this consumer segment.

Virgin Mobile will supplement these methods of communication to specifically advertise and promote the availability of its Lifeline offerings to qualifying customers, including non-English speaking customers, throughout the State of Florida. In addition, Virgin Mobile may market its Lifeline services through its RE*Generation pro-social initiative, which is a program that connects at-risk youth with young people who want to make a difference through partnerships with innovative not-for-profit organizations. The Company also will heavily promote these offerings to its existing customers—many of whom may otherwise qualify for Lifeline—through email and text messages.

E. Virgin Mobile Will Certify and Verify Customer Eligibility

Section 54.410 of the FCC's regulations requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility.²⁹ In accordance with these obligations, Virgin Mobile will require customers to certify their initial eligibility and undertake annual surveys to verify their continued eligibility. The Company will also coordinate its activities with the Florida Department of Children and Families and the Commission to enable Virgin Mobile to participate in the state's automatic enrollment program.

²⁸ See 47 C.F.R. § 54.201.

²⁹ See 47 C.F.R. § 54.410.

V. DESIGNATION OF VIRGIN MOBILE AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.³⁰ There is no question that designation of Virgin Mobile as an ETC in Florida will further the public interest by providing Florida consumers, especially low-income consumers, with lower prices and higher quality services. Many lower-income customers in Florida have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers. Designating Virgin Mobile as an ETC in Florida, therefore, will enable it to expand the availability of affordable telecommunications services to qualifying Florida customers, leading to lower prices and increased choice.

The instant request for ETC designation must be examined in light of the Act’s goals of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—especially low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Virgin Mobile as an ETC would benefit Florida consumers, especially its many low-income consumers eligible for Lifeline services. The Company’s participation in the Lifeline program also undoubtedly would increase opportunities for it to serve Florida customers with appealing and affordable service offerings.

³⁰ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

Designation of Virgin Mobile as an ETC would also promote competition and increase the pressure on other carriers to target low-income consumers with service offerings tailored to their needs, greatly benefiting this much ignored consumer segment. Virgin Mobile will bring the same entrepreneurial spirit that has reinvigorated the wireless industry to the Florida Lifeline market, helping to redefine the wireless experience for many low-income consumers in the state. Other carriers, therefore, will have the incentive to improve their existing service offerings and tailor service plans to contain service terms and features appealing to lower-income customers. This competition would represent a significant step towards ensuring that all low-income customers share in the many benefits associated with access to wireless services, which a study found to be a vital economic resource for low-income consumers that leads to improved wage levels and personal safety.³¹

Virgin Mobile's Lifeline customers will receive the same high-quality wireless services provided to all Company customers. Virgin Mobile has emphasized customer service as an essential pillar for its marketplace success since service launch. Indeed, the Company's success is testament to the principle that wireless carriers can provide lower-income customers with the same features, functionalities and services demanded by higher-income consumers. This intense focus on customer service has been rewarded and customers have responded accordingly. Over 90 percent of Virgin Mobile's customers indicate that they would recommend the service to a friend, while nearly 80 percent already have done so. As evidence of its commitment to high-quality service, Virgin Mobile has complied with the CTIA-The Wireless Association® Consumer Code for Wireless Service ("Consumer Code") since its inception and will continue to

³¹ See Sullivan, "A Review of Literature and Data from Two New Surveys," April 2008.

comply with the Consumer Code once designated as an ETC.³² Virgin Mobile annually certifies its compliance with the Consumer Code, and the FCC has recognized the value of such compliance.³³ In prior years, the Company has also received numerous awards for its high-quality customer service, including the prestigious J.D. Power award for providing “An Outstanding Customer Service Experience” under its Certified Call Center Program.

While Virgin Mobile has experienced success in deploying wireless services to low-income consumers, internal Company analysis suggests that many low-income customers still intermittently discontinue service because of economic constraints. ETC designation in Florida would enable Virgin Mobile to offer appealing and affordable service offerings to low-income Florida customers to ensure that they are able to afford wireless services on a consistent and uninterrupted basis. Without question, prepaid wireless services have become essential for lower-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents.³⁴ Providing Virgin Mobile with the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

VI. ANTI-DRUG ABUSE CERTIFICATION

³² Virgin Mobile’s compliance with the Consumer Code also satisfies its obligations under the FCC’s regulations. See 47 C.F.R. § 54.202(a)(3).

³³ See *Federal-State Joint Board on Universal Service Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1576-77, wherein the FCC endorsed the Consumer Code by considering adherence to the Consumer Code as a factor in the demonstration of a wireless carrier’s qualifications to be an eligible telecommunications carrier.

³⁴ Indeed, a recent aggregate survey of Virgin Mobile customer usage patterns indicated that state and city welfare agencies are among the most frequently contacted by customers.

Virgin Mobile certifies that no party to this Amended Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

VII. CONCLUSION

As discussed above, designation of Virgin Mobile as an ETC in the State of Florida accords with the requirements of section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, for all of the foregoing reasons, Virgin Mobile respectfully requests that the Commission designate Virgin Mobile as an ETC in the State of Florida solely for purposes of participating in the Lifeline program.

Respectfully submitted,

VIRGIN MOBILE USA, L.P.



John M. Beahn

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Tel: 202-371-7392

Counsel to Virgin Mobile USA, L.P.

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Elaine Divelbliss
Virgin Mobile USA, L.P.
10 Independence Blvd.
Warren, NJ 07059
Tel: 908-607-4017

April 1, 2010

EXHIBIT 1
VERIFICATION

Declaration of Virgin Mobile USA, L.P.

I, Peter Lurie, do hereby declare under penalty of perjury as follows:

1. I am the Senior Vice President 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 Amended Petition for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Offering Lifeline Services in the State of Florida and confirm the information contained therein to be true and correct to the best of my knowledge.

3. To the best of my knowledge, Virgin Mobile, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) of the Company are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 1, 2010



Peter Lurie, Senior Vice President

EXHIBIT 2
ORGANIZATIONAL CHART

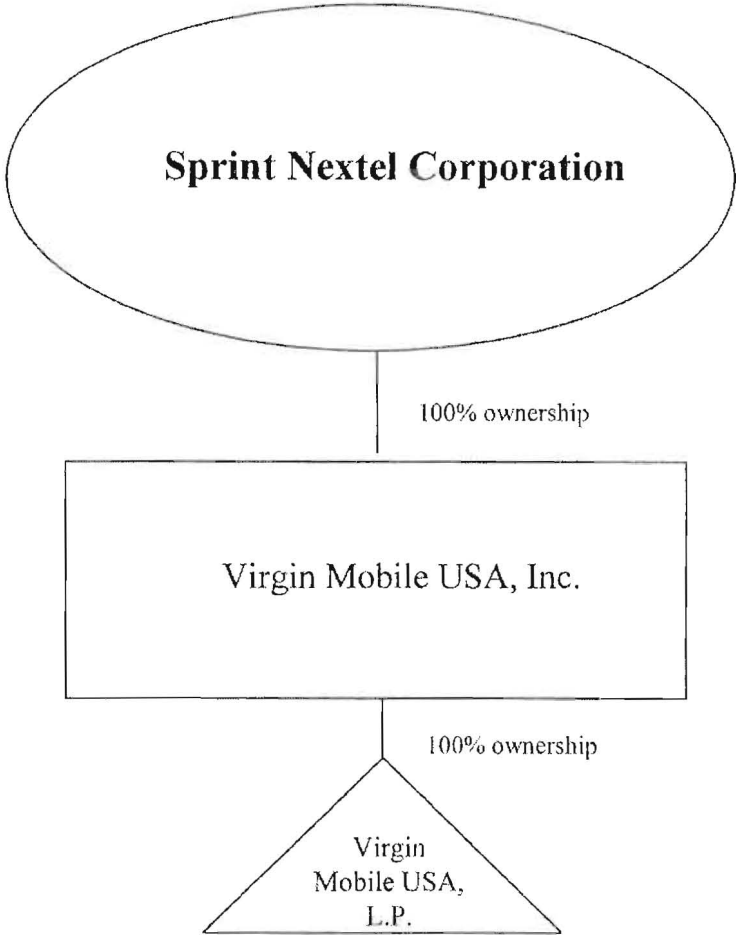


EXHIBIT 3

LIST OF WIRE CENTERS

CLLI	WIRE CENTER NAME	ILEC
ARCHFLMA	ARCHER	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BCRTFLMA	BOCA RATON	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BGPIFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BKVLFLJF	BROOKSVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BLDWFLMA	BALDWIN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BNNLFLMA	BUNNELL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BRSNFLMA	BRONSON	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
BYBHFLMA	BOYNTON BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
CCBHFLMA	COCOA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
CFLDFLMA	CHIEFLAND	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
CHPLFLJA	CHIPLEY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
CNTMFLLE	CANTONMENT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
COCOFLME	COCOA EAST	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DBRYFLDL	DEBARY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DBRYFLMA	DEBARY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DELDFLMA	DE LAND	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DLBHFLMA	DELRAY BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DLSNFLMA	DELEON SPRINGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DRBHFLMA	DEERFIELD BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DYBHFLFN	DAYTONA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DYBHFLFB	DAYTONA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
DYBHFLFS	DAYTONA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
EGLLFLBG	EAU GALLIE WEST	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
EGLLFLIH	EAU GALLIE EAST	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FLBHFLMA	FLAGLER BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FRBHFLFP	FERNANDINA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTGRFLMA	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLCR	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLCY	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLJA	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLQA	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLPL	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLSU	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
FTLDFLWN	FORT LAUDERDALE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
GCSPFLCN	GREEN COVE SPRINGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
GENVFLMA	GENEVA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
GLBRFLMC	GULF BREEZE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
GSVLFLNW	GAINESVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HAVNFLMA	HAVANA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HBSDFLMA	HOBE SOUND	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HLNVFLMA	HOLLEY-NAVARRE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HLWDFLHA	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HLWDFLMA	HOLLYWOOD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HMSTFLEA	HOMESTEAD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HMSTFLNA	HOMESTEAD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL

CLLI	WIRE CENTER NAME	ILEC
HTISFLMA	PORT ST LUCIE-SOUTH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
HWTHFLMA	HAWTHORNE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ISLMFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCBHFLAB	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCBHFLMA	JACKSONVILLE BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCBHFLSP	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLAR	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLBW	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLFC	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLIA	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLJT	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLLF	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLNO	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLOW	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLRV	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLSJ	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLSM	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JCVLFLWC	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
JPTRFLMA	JUPITER	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
KYHGFLMA	KEYSTONE HEIGHTS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
KYLRFLLS	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
KYLRFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
KYWSFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
LKCYFLMA	LAKE CITY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
LKMRFLHE	SANFORD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MCNPFLMA	MICANOPY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MDBGFLPM	MIDDLEBURG	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLAE	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLAL	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLBA	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLBC	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLBR	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLDB	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLFL	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLGR	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLHL	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLIC	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLKE	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLME	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLNS	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLOL	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLPB	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLPL	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLRR	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLSH	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLSO	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL

CLLI	WIRE CENTER NAME	ILEC
MIAMFLWD	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MIAMFLWM	MIAMI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MICCFLBB	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MLBRFLMA	MELBOURNE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MLTNFLRA	MILTON	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MNDRFLAV	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MNDRFLLO	JACKSONVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MNDRFLLW	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MRTHFLVE	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
MXVFLMA	MAXVILLE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
NDADFLAC	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
NDADFLBR	NORTH DADE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
NKLRFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
NSBHFLMA	NEW SMYRNA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
NWBYFLMA	NEWBERRY	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
OKHLFLMA	OAK HILL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
OLTWFLLN	OLD TOWN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORLDFLAP	ORLANDO	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORLDFLPC	ORLANDO	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORLDFLPH	ORLANDO	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORLDFLSA	ORLANDO	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORPKFLMA	ORANGE PARK	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ORPKFLRW	ORANGE PARK	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PACEFLPV	PACE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PAHKFLMA	PAHOKEE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PCBHFLNT	PANAMA CITY BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PLTKFLMA	PALATKA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PMBHFLCS	CORAL SPRINGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PMBHFLFE	POMPANO BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PMBHFLNP	POMPANO BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PMBHFLTA	POMPANO BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PMPKFLMA	POMONA PARK	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PNSCFLFP	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PNSCFLHC	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PNSCFLPB	PENSACOLA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PNVDFLMA	PONTE VEDRA BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PRRNFLMA	PERRINE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PRSNFLFD	PIERSON	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PTSLFLMA	PORT ST LUCIE-NORTH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
PTSLFLSO	PORT ST LUCIE-SOUTH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
SBSTFLFE	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
SBSTFLMA	SEBASTIAN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
SGKYFLMA	KEYS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
SNFRFLMA	SANFORD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
STAGFLBS	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
STAGFLMA	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL

CLLI	WIRE CENTER NAME	ILEC
STAGFLSH	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
STAGFLWG	ST JOHNS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
STRNFLMA	STUART	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
TRENFLMA	TRENTON	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
VRBHFLBE	VERO BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
VRBHFLMA	VERO BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WELKFLMA	WELAKA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WPBHFLGA	WEST PALM BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WPBHFLHH	WEST PALM BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WPBHFLLE	WEST PALM BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WPBHFLRB	WEST PALM BEACH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WWSPFLHI	WEEKIWACHEE SPRINGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
WWSPFLSH	WEEKIWACHEE SPRINGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
YNFNFLMA	YOUNGSTOWN- FOUNTAIN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
YNTWFLMA	YANKEETOWN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
YULEFLMA	YULEE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
ALFRFLXA	ALFORD	EMBARQ FLORIDA INC. (CENTRAL)
ALSPFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
ALVAFLXA	FORT MYERS,FL	EMBARQ FLORIDA, INC.
ARCDFLXA	ARCADIA	EMBARQ FLORIDA, INC.
ASTRFLXA	ASTOR	EMBARQ FLORIDA, INC.
BAKRFLXA	BAKER	EMBARQ FLORIDA INC. (CENTRAL)
BLVWFLXA	BELLEVIEW	EMBARQ FLORIDA, INC.
BNFYFLXA	BONIFAY	EMBARQ FLORIDA INC. (CENTRAL)
BSHNFLXA	BUSHNELL	EMBARQ FLORIDA, INC.
BVHLFLXA	BEVERLY HILLS	EMBARQ FLORIDA, INC.
BWLGFLXA	BOWLING GREEN	EMBARQ FLORIDA, INC.
CHLKFLXA	CHERRY LAKE	EMBARQ FLORIDA INC. (CENTRAL)
CLMTFLXA	CLERMONT	EMBARQ FLORIDA, INC.
CPCRFLXA	CAPE CORAL	EMBARQ FLORIDA, INC.
CPCRFLXB	NORTH CAPE CORAL	EMBARQ FLORIDA, INC.
CPHZFLXA	CAPE HAZE	EMBARQ FLORIDA, INC.
CRRVFLXA	CRYSTAL RIVER	EMBARQ FLORIDA, INC.
CRVWFLXA	CRESTVIEW	EMBARQ FLORIDA INC. (CENTRAL)
CSLBFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
CTDLFLXA	COTTONDALE	EMBARQ FLORIDA INC. (CENTRAL)
CYLKFLXA	FORT MYERS,FL	EMBARQ FLORIDA, INC.
CYLKFLXB	FORT MYERS,FL	EMBARQ FLORIDA, INC.
DESTFLXA	DESTIN	EMBARQ FLORIDA INC. (CENTRAL)
FTMBFLXA	FORT MYERS BEACH	EMBARQ FLORIDA, INC.
FTMDFLXA	FORT MEADE	EMBARQ FLORIDA, INC.
FTMYFLXB	FORT MYERS,FL	EMBARQ FLORIDA, INC.
FTMYFLXC	FORT MYERS,FL	EMBARQ FLORIDA, INC.

CLLI	WIRE CENTER NAME	ILEC
FTWBFLXA	FORT WALTON BEACH	EMBARQ FLORIDA INC. (CENTRAL)
FTWBFLXB	FORT WALTON BEACH	EMBARQ FLORIDA INC. (CENTRAL)
GDRGFLXA	GRAND RIDGE	EMBARQ FLORIDA INC. (CENTRAL)
GLGCFLXA	NAPLES	EMBARQ FLORIDA, INC.
GLRDFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
GNVFLXA	GREENVILLE	EMBARQ FLORIDA INC. (CENTRAL)
GNWDFLXA	GREENWOOD	EMBARQ FLORIDA INC. (CENTRAL)
HMSPFLEXA	HOMOSSASSA SPRINGS	EMBARQ FLORIDA, INC.
HOWYFLXA	HOWEY-IN-THE-HILLS	EMBARQ FLORIDA, INC.
IMKLFLXA	IMMOKALEE	EMBARQ FLORIDA, INC.
INVRFLXA	INVERNESS	EMBARQ FLORIDA, INC.
IONAFLXA	FORT MYERS,FL	EMBARQ FLORIDA, INC.
KGLKFLXA	KINGSLEY LAKE	EMBARQ FLORIDA INC. (CENTRAL)
KSSMFLXA	KISSIMMEE	EMBARQ FLORIDA, INC.
KSSMFLXB	WEST KISSIMMEE	EMBARQ FLORIDA, INC.
KSSMFLXD	KISSIMMEE	EMBARQ FLORIDA, INC.
LDLKFLXA	LADY LAKE1	EMBARQ FLORIDA, INC.
LEE FLXA	LEE	EMBARQ FLORIDA INC. (CENTRAL)
LHACFLXA	LEHIGH ACRES	EMBARQ FLORIDA, INC.
LKBRFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
LKHLFLXA	ORANGE CITY	EMBARQ FLORIDA, INC.
LKPCFLXA	LAKE PLACID	EMBARQ FLORIDA, INC.
LSBGFLXA	LEESBURG	EMBARQ FLORIDA, INC.
LWTYFLXA	LAWTEY	EMBARQ FLORIDA INC. (CENTRAL)
MDSNFLXA	MADISON	EMBARQ FLORIDA INC. (CENTRAL)
MOISFLXA	MARCO ISLAND	EMBARQ FLORIDA, INC.
MRDCFLXA	PORT CHARLOTTE	EMBARQ FLORIDA, INC.
MRNNFLXA	MARIANNA	EMBARQ FLORIDA INC. (CENTRAL)
MTDRFLXA	MOUNT DORA	EMBARQ FLORIDA, INC.
MTLDFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
MTVRFLXA	MONTVERDE	EMBARQ FLORIDA, INC.
NFMYFLXA	NORTH FORT MYERS	EMBARQ FLORIDA, INC.
NFMYFLXB	NORTH FORT MYERS	EMBARQ FLORIDA, INC.
NNPLFLXA	NORTH NAPLES	EMBARQ FLORIDA, INC.
NPLSFLXC	NAPLES	EMBARQ FLORIDA, INC.
NPLSFLXD	NAPLES	EMBARQ FLORIDA, INC.
OCALFLXB	OCALA	EMBARQ FLORIDA, INC.
OCALFLXC	OCALA	EMBARQ FLORIDA, INC.
OCALFLXJ	OCALA	EMBARQ FLORIDA, INC.
OCNFFLXA	FOREST	EMBARQ FLORIDA, INC.
OKCBFLXA	OKEECHOBEE	EMBARQ FLORIDA, INC.
OKLWFLXA	OKLAWAHA	EMBARQ FLORIDA, INC.
ORCYFLXA	ORANGE CITY	EMBARQ FLORIDA, INC.
ORCYFLXC	ORANGE CITY	EMBARQ FLORIDA, INC.
PANCFLXA	PANACEA	EMBARQ FLORIDA INC. (CENTRAL)
PNGRFLXA	PUNTA GORDA	EMBARQ FLORIDA, INC.

CLLI	WIRE CENTER NAME	ILEC
PNISFLXA	PINE ISLAND	EMBARQ FLORIDA, INC.
PTCTFLXA	PORT CHARLOTTE	EMBARQ FLORIDA, INC.
SCPKFLXA	FORT MYERS,FL	EMBARQ FLORIDA, INC.
SGBHFLXA	SEAGROVE BEACH	EMBARQ FLORIDA INC. (CENTRAL)
SHLMFLXA	SHALIMAR	EMBARQ FLORIDA INC. (CENTRAL)
SNANFLXA	SAN ANTONIO	EMBARQ FLORIDA, INC.
SNDSFLXA	SNEADS	EMBARQ FLORIDA INC. (CENTRAL)
SNISFLXA	SANIBEL-CAPTIVA ISLND	EMBARQ FLORIDA, INC.
SNRSFLXA	SANTA ROSA BEACH	EMBARQ FLORIDA INC. (CENTRAL)
STCDFLXA	ST CLOUD	EMBARQ FLORIDA, INC.
SVSSFLXA	SILVER SPRINGS SHORES	EMBARQ FLORIDA, INC.
TLHSFLXA	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXB	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXD	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXE	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXF	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXG	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TLHSFLXH	TALLAHASSEE	EMBARQ FLORIDA INC. (CENTRAL)
TVRSFLXA	TAVARES	EMBARQ FLORIDA, INC.
UMTLFLXA	UMATILLA	EMBARQ FLORIDA, INC.
VLPRFLXA	VALPARAISO	EMBARQ FLORIDA INC. (CENTRAL)
VLPRFLXB	VALPARAISO	EMBARQ FLORIDA INC. (CENTRAL)
WCHLFLXA	WAUCHULA	EMBARQ FLORIDA, INC.
WLSTFLXA	WILLISTON	EMBARQ FLORIDA, INC.
WLWDFLXA	WILDWOOD	EMBARQ FLORIDA, INC.
WDRFLXA	WINDERMERE	EMBARQ FLORIDA, INC.
WNGRFLXA	WINTER GARDEN	EMBARQ FLORIDA, INC.
WNPKFLXA	WINTER PARK	EMBARQ FLORIDA, INC.
WSTVFLXA	WESTVILLE	EMBARQ FLORIDA INC. (CENTRAL)
ZLSPFLXA	ZOLFO SPRINGS	EMBARQ FLORIDA, INC.
ABDLFLXA	WINTER HAVEN	VERIZON FLORIDA INC.
ALFAFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
ALTRFLXA	BARTOW	VERIZON FLORIDA INC.
ANMRFLXA	BRADENTON	VERIZON FLORIDA INC.
BARTFLXA	BARTOW	VERIZON FLORIDA INC.
BAYUFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
BBPKFLXA	LAKE WALES	VERIZON FLORIDA INC.
BHPKFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
BRBAFLXA	BRADENTON	VERIZON FLORIDA INC.
BRJTFLXA	MULBERRY	VERIZON FLORIDA INC.
BRNDFLXA	TAMPA-EAST AREA	VERIZON FLORIDA INC.
BRTNFLXX	BRADENTON	VERIZON FLORIDA INC.

CLLI	WIRE CENTER NAME	ILEC
BYSHFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
CNSDFLXA	CLEARWATER	VERIZON FLORIDA INC.
CRWDFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
CYGRFLXA	WINTER HAVEN	VERIZON FLORIDA INC.
DNDNFLXA	CLEARWATER	VERIZON FLORIDA INC.
DUNDFLXA	HAINES CITY,FL	VERIZON FLORIDA INC.
ENWDFLXA	ENGLEWOOD	VERIZON FLORIDA INC.
FRSTFLXA	FROSTPROOF	VERIZON FLORIDA INC.
GNDYFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
HDSNFLXA	HUDSON	VERIZON FLORIDA INC.
HGLDFLXA	LAKELAND	VERIZON FLORIDA INC.
HNCYFLXA	HAINES CITY,FL	VERIZON FLORIDA INC.
HNCYFLXN	HAINES CITY,FL	VERIZON FLORIDA INC.
HYPKFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
INLKFLXA	INDIAN LAKE	VERIZON FLORIDA INC.
INRKFLXX	CLEARWATER	VERIZON FLORIDA INC.
KYSTFLXA	TAMPA-WEST AREA	VERIZON FLORIDA INC.
LGBKFLXA	SARASOTA	VERIZON FLORIDA INC.
LKALFLXA	WINTER HAVEN	VERIZON FLORIDA INC.
LKLDLFLXA	LAKELAND	VERIZON FLORIDA INC.
LKLDLFLXE	LAKELAND	VERIZON FLORIDA INC.
LKLDLFLXN	LAKELAND	VERIZON FLORIDA INC.
LKWFLFLXA	LAKE WALES	VERIZON FLORIDA INC.
LKWFLFLXE	LAKE WALES	VERIZON FLORIDA INC.
LLMNFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
LNLKFLXA	TAMPA-NORTH AREA	VERIZON FLORIDA INC.
LRGOFLXA	CLEARWATER	VERIZON FLORIDA INC.
LUTZFLXA	TAMPA-NORTH AREA	VERIZON FLORIDA INC.
MLBYFLXA	MULBERRY	VERIZON FLORIDA INC.
MNLKFLXA	HUDSON	VERIZON FLORIDA INC.
MYCYFLXA	MYAKKA	VERIZON FLORIDA INC.
NGBHFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
NPRCFLXA	NEW PORT RICHEY	VERIZON FLORIDA INC.
NRSDFLXA	SARASOTA	VERIZON FLORIDA INC.
OLDSFLXA	TAMPA-WEST AREA	VERIZON FLORIDA INC.
OSPRFLXA	VENICE	VERIZON FLORIDA INC.
PKCYFLXA	POLK CITY	VERIZON FLORIDA INC.
PLMTFLXA	PALMETTO	VERIZON FLORIDA INC.
PLSLFLXA	BRADENTON	VERIZON FLORIDA INC.
PNCRFLXA	PLANT CITY-MCMET	VERIZON FLORIDA INC.
PNLSFLXA	CLEARWATER	VERIZON FLORIDA INC.
PRSHFLXA	PALMETTO	VERIZON FLORIDA INC.
PSDNFLXA	ST PETERSBURG	VERIZON FLORIDA INC.

CLLI	WIRE CENTER NAME	ILEC
RSKNFLXA	TAMPA-SOUTH AREA	VERIZON FLORIDA INC.
SARKFLXA	SARASOTA	VERIZON FLORIDA INC.
SEKYFLXA	SARASOTA	VERIZON FLORIDA INC.
SGBEFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
SKWYFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
SLSPFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
SMNLFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
SNSPFLXA	NEW PORT RICHEY	VERIZON FLORIDA INC.
SPBGFLXA	ST PETERSBURG	VERIZON FLORIDA INC.
SPBGFLXS	ST PETERSBURG	VERIZON FLORIDA INC.
SPRGFLXA	SARASOTA	VERIZON FLORIDA INC.
SRSTFLXA	SARASOTA	VERIZON FLORIDA INC.
STGRFLXA	CLEARWATER	VERIZON FLORIDA INC.
SWTHFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
TAMPFLXE	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
TAMPFLXX	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
TMTRFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
TRSPFLXA	TARPON SPRINGS	VERIZON FLORIDA INC.
UNVRFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
VENCFLXA	VENICE	VERIZON FLORIDA INC.
VENCFLXS	VENICE	VERIZON FLORIDA INC.
WLCHFLXA	TAMPA-NORTH AREA	VERIZON FLORIDA INC.
WLCRFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
WNHNFLXC	WINTER HAVEN	VERIZON FLORIDA INC.
WSSDFLXA	TAMPA-CENTRAL AREA	VERIZON FLORIDA INC.
ZPHYFLXA	ZEPHYRHILLS	VERIZON FLORIDA INC.
ALCHFLXA	ALACHUA	WINDSTREAM FLORIDA, INC.
BORAFLXA	FL SHERIFFS BOYS RANCH	WINDSTREAM FLORIDA, INC.
CITRFLXA	CITRA	WINDSTREAM FLORIDA, INC.
CLHNFLXA	CALLAHAN	WINDSTREAM FLORIDA, INC.
CRCYFLXA	CRESCENT CITY	WINDSTREAM FLORIDA, INC.
FLRHFLXA	FLORAHOME (CLAY CNTY)	WINDSTREAM FLORIDA, INC.
HGSPFLXA	HIGH SPRINGS	WINDSTREAM FLORIDA, INC.
HLRDFLXA	HILLIARD	WINDSTREAM FLORIDA, INC.
INTRFLXA	INTERLACHEN	WINDSTREAM FLORIDA, INC.

CLLI	WIRE CENTER NAME	ILEC
JNGSFLXA	JENNINGS	WINDSTREAM FLORIDA, INC.
MLRSFLXA	MELROSE	WINDSTREAM FLORIDA, INC.
RAFRFLXA	RAIFORD	WINDSTREAM FLORIDA, INC.
WALDFLXA	WALDO	WINDSTREAM FLORIDA, INC.
WLBRFLXA	WELLBORN	WINDSTREAM FLORIDA, INC.