

Hublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

April 23, 2010

TO:

Office of Commission Clerk (Cole)

FROM:

Division of Regulatory Analysis (Beard, Casey)

Office of the General Counsel (Tan)

RE:

Docket No. 090245-TP - Petition for limited designation as eligible

telecommunications carrier (ETC) by Virgin Mobile USA, L.P.

AGENDA: 05/04/10 - Regular Agenda - Proposed Agency Action - Interested Persons May

Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER:

Argenziano

CRITICAL DATES:

None

SPECIAL INSTRUCTIONS:

None

FILE NAME AND LOCATION:

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Case Background

On March 13, 2007, the Florida Public Service Commission (FPSC or Commission) addressed the issue of whether or not the FPSC has jurisdiction to designate commercial mobile radio service (CMRS) providers as eligible telecommunications carriers (ETCs)¹. By Order No. PSC-07-0288-PAA-TP, issued April 3, 2007, in Docket Nos. 060581-TP and 060582-TP, the FPSC found that with the enactment of Section 364.011, Florida Statutes (F.S.), the Florida Legislature granted the FPSC limited authority over CMRS providers for those matters specifically authorized by federal law. Therefore, pursuant to Section 214(e)(2) of the

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FPSC-COMMISSION CLERK

¹ ETC designation allows companies to receive high-cost and low-income monies from the Federal Universal Service Fund.

Telecommunications Act of 1996 (the Act), which authorizes states to designate ETC carriers, the FPSC has jurisdiction over CMRS providers for the purpose of considering ETC petitions.

On April 29, 2009, Virgin Mobile USA, L.P. (Virgin Mobile) filed a petition with the FPSC for limited designation as an ETC to receive universal service Lifeline support in the State of Florida. Virgin Mobile was not seeking high-cost funds from the Universal Service Fund (USF). On April 1, 2010, that petition was withdrawn and an amended petition was filed.

Virgin Mobile is a wireless pre-paid telephone service provider. In 2002, Virgin Mobile was established as a joint venture between Sprint-Nextel and the Virgin Group. Virgin Mobile was established to focus on the pay-as-you-go or prepaid market. Sprint-Nextel serves as the backbone for Virgin Mobile's service, including the network infrastructure and wireless transmission facilities. In November 2009, Sprint-Nextel completed its acquisition as the new owner of Virgin Mobile.

As a result of the acquisition, Virgin Mobile attests that it is a wholly owned subsidiary of Sprint-Nextel. Virgin Mobile has acknowledged to staff that Virgin Mobile operates as a facilities-based carrier and no longer resells services in the State of Florida. Prior to the November 2009 acquisition, Virgin Mobile filed a petition with the FCC seeking forbearance from the facilities-based requirements in Section 214(e)(1)(A), which requires that a carrier be at least, in part, facilities-based to be eligible for designation as an ETC. By Order 09-18, issued March 5, 2009, in Docket 96-45, the FCC granted Virgin Mobile forbearance from the facilities-based requirement. Virgin Mobile attests that since it is no longer a reseller, the forbearance is no longer applicable.

Similar proceedings have taken place in Michigan, where the Michigan PSC stated in a March 18, 2010 Order that, "After reviewing Virgin Mobile's application, the Commission finds that Virgin Mobile satisfies the requirements for designation as a facilities-based ETC. 47 USC 214(e)(1)(A). . . . Thus, the application filed by Virgin Mobile for ETC designation for purposes of receiving Low Income USF support for Lifeline is granted. With the change in ETC designation from a wireless reseller to a facilities-based carrier, all of the conditions listed on page 4 of the December 1, 2009 Commission order are dismissed." A Virgin Mobile ETC designation petition in Michigan was approved by the Michigan PSC on December 1, 2009.

On April 14, 2010, the Maryland Public Service Commission (MPSC) reviewed Virgin Mobile's petition for designation as an ETC at its scheduled Administrative Meeting. At that meeting, the MSPC granted Virgin Mobile designation as an ETC following a 30-day comment period.

On April 19, 2010, TracFone Wireless Inc., (TracFone) and Capital Area Community Services, Inc. (CACS) filed a joint petition for Leave to Intervene and Joint Petition for rehearing in Michigan regarding the recent decision by Michigan to grant Virgin Mobile ETC desigation. TracFone and CACS are not questioning the designation of Virgin Mobile as an ETC, but are questioning the criteria Virgin Mobile has to comply with now that it is a wholly owned subsidiary instead of a reseller.

By Order 09-18, released March 5, 2009, the Federal Communications Commission (FCC) designated Virgin Mobile as a limited ETC in New York, North Carolina, Tennessee, and Virginia for the purpose of receiving only Lifeline support from the USF. Virgin Mobile has pending ETC designation petitions at the FCC for Alabama, Connecticut, Delaware, New Hampshire, and the District of Columbia. Virgin Mobile also has pending state applications for ETC status in California and Texas.

The Commission has jurisdiction pursuant to Section 214(e)(2) of the Act, Sections 364.10(2) and 364.11, F.S., to address a petition by a CMRS provider seeking designation as an ETC.

Discussion of Issues

<u>Issue 1</u>: Should Virgin Mobile be granted limited ETC status in Florida for the purpose of offering Lifeline discounts to qualifying consumers in Florida?

Recommendation: Yes. Staff recommends that Virgin Mobile be granted limited ETC designation status in the AT&T, Verizon, and CenturyLink wire centers listed in Attachment B of this recommendation for the sole purpose of offering Lifeline discounts to qualifying consumers in Florida. Granting of ETC designation should be contingent on Virgin Mobile providing the following:

- E911 compliant handsets should be provided to Virgin Mobile's new Lifeline customers and Virgin Mobile should replace any non-compliant handsets for its existing customers who are approved as Lifeline customers at no charge;
- Each Lifeline customer shall receive 200 free anytime minutes each month;
- Self-certification of Virgin Mobile Lifeline customers under penalty of perjury once service has been activated. In addition to the PSC's annual Lifeline verification eligibility requirement, annual certification verifying that the head of household is only receiving Lifeline discounts from Virgin Mobile;
- Tracking of Lifeline customer's primary residential address and certification that there is only one customer receiving Virgin Mobile Lifeline at each residential address;
- Virgin Mobile should deal directly with its customers who do not utilize the Lifeline Automatic Enrollment function, to certify and verify Lifeline eligibility; and
- Submission of a quarterly report showing the number of customers who have been deactivated for not having any activity on their phone in a 60-day period, not passing annual verification, and voluntarily being deactivated.

(Beard, Casey)

<u>Staff Analysis</u>: Under FCC rules, state commissions have primary responsibility to designate providers as ETCs.² Designation as an ETC is required in order for a provider to be eligible to receive monies from the federal USF. Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under Section 214(e) shall be eligible to receive specific federal universal service support." According to Section 214(e)(1), a common carrier designated as an ETC must offer and advertise the services supported by the federal Universal Service mechanisms throughout a designated service area.

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² 47 U.S.C. Section 214(e)(2), 47 CFR Section 54.201(b).

³ 47 U.S.C. Section 254(e)(2).

ETC Certification Requirements

The Code of Federal Regulations (CFR) addresses a state commission's responsibilities related to an ETC designation:⁴

Upon request and consistent with the public interest, convenience, and necessity, the state 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 eligible telecommunications carrier for a service area designated by the state commission, so long as each additional requesting carrier meets the requirements of paragraph (d) of this section. Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the state commission shall find that the designation is in the public interest.

To qualify as an ETC, a carrier must provide the nine services identified in 47 CFR 54.101 throughout the service area for which designation is received either using its own facilities or a combination of its own facilities and resale of another carrier's facilities. The services are:

- (1) Voice grade access to the public switched network Voice grade access is defined as a functionality that enables a user of telecommunications services 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 indicating there is an incoming call;
- (2) <u>Local Usage</u> Local usage indicates the amount of minutes of use of exchange service, provided free of charge to end users;
- (3) <u>Dual-tone multi-frequency signaling or its functional equivalent</u> Dual-tone multi-frequency ("DTMF") is a method of signaling that facilitates the transportation of signaling through the network, thus shortening call set-up time;
- (4) <u>Single-party service or its functional equivalent</u> Single-party service is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;
- (5) Access to emergency services Access to emergency services includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations;

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⁴ 47 CFR Section 54.201(c)

- (6) Access to operator services Access to operator services is defined as access to any automatic or live assistance to a consumer to arrange for billing and/or completion of a telephone call;
- (7) Access to interexchange service Access to interexchange service is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- (8) Access to directory assistance Access to directory assistance is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- (9) <u>Toll limitation for qualifying low-income consumers</u> Toll limitation or blocking restricts all direct-dial toll access.

In addition to providing the above services, 47 CFR 54.405(b) specifies that ETCs must publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

Additional ETC Certification Requirements

In addition to requiring the above services, the FCC, on March 17, 2005, issued a Report and Order that established additional criteria that all ETC applicants must satisfy in order to be granted ETC status by the FCC. In this Order, the FCC determined that an ETC applicant must also demonstrate:

- 1) a commitment and ability to provide the supported services throughout the designated area:
- 2) the ability to remain functional in emergency situations;
- 3) ability to satisfy consumer protection and service quality standards;
- 4) provision of local usage comparable to that offered by the incumbent LEC; and
- 5) an acknowledgement that the applicant may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.

The FCC encouraged states to also adopt these criteria, and the FPSC has done so in Docket No. 010977-TL, by Order No. PSC-05-0824-FOF-TL, issued August 15, 2005.

Staff has reviewed Virgin Mobile's petition for designation as an ETC in Florida, as well as additional documents filed with the FPSC and with the FCC. Staff has verified that Virgin Mobile has complied with the above requirements to be eligible as an ETC in Florida and Virgin Mobile has demonstrated its ability to provide the nine services identified in 47 CFR 54.101 using resale services.

Public Interest Determinations

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas. The FPSC has determined that before designating a carrier as an ETC, it should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

Virgin Mobile states that approval of its ETC petition would be in the public interest by allowing Virgin Mobile to provide low-income Florida consumers with more affordable and higher quality wireless services. Many lower-income consumers have not yet reaped the full benefits of the intensely competitive wireless marketplace. Whether because of financial constraints, poor credit, or intermittent employment, these consumers often lack the countless choices available to most consumers. Virgin Mobile believes that designating it as an ETC would enable it to expand the availability of affordable telecommunications services to qualifying Florida consumers, which would lead to lower prices and increased consumer choice. According to Virgin Mobile, designating it as an ETC would further the fundamental goals of universal service policy by broadening the availability of telecommunications services to low-income Florida consumers, who are the intended beneficiaries of universal service.

Virgin Mobile Lifeline Offering

Prior to commencement of service, Virgin Mobile will require applicants to attest and sign under penalty of perjury that they meet the relevant eligibility criteria and that they are head of their household and will be receiving Lifeline-supported service only from Virgin Mobile. Virgin Mobile's Lifeline offering includes the following:

• Lifeline-eligible customers will receive a free handset once they are approved for service in Florida;

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⁵ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order FCC 05-46 (¶40), Adopted: February 25, 2005, Released: March 17, 2005.

⁶ In re: Petition for designation as eligible telecommunications carrier (ETC) by Easy Telephone, Inc., Docket No. 090337-TX, PSC-10-0125-PAA-TX, issued March 2, 2010, p.4; In re: Application for designation as eligible telecommunications carrier (ETC) by Express Phone Service, Inc., Docket No. 080169-TX, PSC-08-0836-PAA-TX, issued December 24, 2008, p.4.

- Existing Virgin Mobile customers will be permitted to avail themselves of the free handset offer or continue to use their current handset once approved for Lifeline service;
- Customers will not be required to enter into a long-term service contract;
- Customers will automatically receive 200 anytime minutes each month at no charge (minutes do not rollover if not used);
- Additional minutes can be purchased through prepaid cards wherever Virgin Mobile products and services for \$0.20 per minute and \$0.10 per minute text; and,
- Voice mail, caller ID, and call waiting will be included.

Virgin Mobile has acknowledged the requirements of the Florida Lifeline program, and it has agreed to adhere to the program which provides qualified customers a total of \$13.50 in Lifeline assistance credits consisting of: \$6.50 in federal subscriber line charges, \$1.75 in federal support for states that have approved the credit, and \$1.75 which is a 50% match of federal support for having a state Lifeline program requiring a \$3.50 credit under the Florida eligibility criteria. Virgin Mobile indicates that it will provide the \$3.50 credit to qualified clients, advertise the availability of Lifeline, and begin offering these services as soon as possible after meeting any requirements implemented by the FPSC.

Virgin Mobile has also indicated that its accounts with the FCC and the Universal Service Administrative Company (USAC) are current, and it is not aware of any outstanding complaints or violations with either entity. As part of the petition process, Virgin Mobile has agreed to abide by any applicable Florida Statutes, Florida Administrative rules, and Florida PSC Orders pertaining to the Lifeline program, and commits to use federal universal service support only for the provision of services for which the support is intended.

Lifeline Advertising

Virgin Mobile will advertise the availability and rates for the services described above in its Florida service areas using media of general distribution as required by Section 214(e)(1)(B) of the Act. Virgin Mobile will target locations where consumers receive benefits that make them eligible for Lifeline services, including various state and local social service agencies, to inform customers of the availability of its Lifeline services. Virgin Mobile will coordinate its efforts with public and private assistance agencies to ensure the availability of Lifeline services reaches the broadest audience possible. Virgin Mobile also will develop outreach efforts for non-English speakers, and increase awareness of the Lifeline program at existing third-party retail outlets through distribution of brochures. In addition, Virgin Mobile may market its Lifeline services through its Re*Generation pro-social program, 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. Finally, Virgin Mobile will promote its Lifeline offerings to its existing customers, many of whom will qualify for Lifeline, through emails and text messaging campaigns.

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⁷ See 47 U.S.C. Section 214(e)(1)(B)

Transitional Lifeline

To comply with the requirement of Transitional Lifeline, Virgin Mobile stated that it will comply with the requirement of providing a 30 percent monthly discount to customers no longer qualifying for Lifeline for a period of 12 months. Because of the pay-as-you-go nature of its offering, Virgin Mobile will provide one of two options for transitional Lifeline customers: (a) a 30 percent discount on its standard \$0.20 per minute rate or (b) a 30 percent discount on the 200-minute plan at a rate of \$10 per month. In both options (a) and (b) the transition would be for a period of one year on the customer's handset.

Conclusion

Virgin Mobile states it is able to provide all services and functionalities supported by the universal service program, detailed in CFR Section 54.101(a). Virgin Mobile understands all ETC requirements of the FCC and the FPSC and has agreed to abide by all applicable Florida Statutes, Florida Administrative Rules, and Florida PSC Orders (See Attachment A certification). Virgin Mobile also understands that the FPSC has the authority to both grant and revoke ETC designation if Virgin Mobile is non-compliant.

Based on staff's review, along with Virgin Mobile's commitment to abide by both state and federal rules and procedures, staff believes that Virgin Mobile's petition to be designated as an ETC is in the public interest and should be approved. If Virgin Mobile should decide in the future to seek High Cost universal service funds, it should be required to file a petition and make a showing that it would be in the public interest to grant such a request. Upon a decision by the Commission, staff will continue the necessary oversight to ensure that Virgin Mobile, along with all other ETCs in Florida, are upholding these principles and attaining the goals and objectives of both the state and federal universal service programs.

Based on the above, staff recommends that Virgin Mobile be granted limited ETC designation status in the AT&T, Verizon, and CenturyLink wire centers listed in Attachment B of this recommendation, for the sole purpose of offering Lifeline discounts to qualifying consumers in Florida. Granting of ETC designation should be contingent on Virgin Mobile providing the following:

- E911 compliant handsets should be provided to Virgin Mobile's new customers and Virgin Mobile should replace any non-compliant handsets for its existing customers who are approved as Lifeline customers at no charge;
- Each Lifeline customer shall receive 200 free anytime minutes each month;

⁸ Transitional Lifeline requires that each local exchange telecommunications company shall offer discounted residential basic local telecommunications service at 70 percent of the residential local telecommunications service rate for any Lifeline subscriber who no longer qualifies for Lifeline. A Lifeline subscriber who requests such service shall receive the discounted price for a period of one year after the date the subscriber ceases to be qualified for Lifeline. In no event, shall this preclude the offering of any other discounted services which comply with Sections 364.08, 364.09, and 364.10 F.S., per 364.105 F.S.

- Self-certification of Virgin Mobile Lifeline customers under penalty of perjury once service has been activated. In addition to the PSC's annual Lifeline verification eligibility requirement, annual certification verifying that the head of household is only receiving Lifeline discounts from Virgin Mobile;
- Tracking of Lifeline customer's primary residential address and certification that there is only one customer receiving Virgin Mobile Lifeline at each residential address;
- Virgin Mobile should deal directly with its customers who do not utilize the Lifeline Automatic Enrollment function, to certify and verify Lifeline eligibility; and
- Submission of a quarterly report showing the number of customers who have been deactivated for not having any activity on their phone in a 60-day period, not passing annual verification, and voluntarily being deactivated.

<u>Issue 2</u>: Should this docket be closed?

Recommendation: If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, this docket should be closed upon the issuance of a consummating order. (Tan)

<u>Staff Analysis</u>: At the conclusion of the protest period, if no protest is filed this docket should be closed upon the issuance of a consummating order.

Docket No. 090245-TP Attachment A

Date: April 23, 2010

APPLICANT CERTIFICATION

State of New Jersey County of Somerset

My name is Peter Lurie, I am employed by Virgin Mobile USA, L.P., located at 10 Independence Blvd., Warren, NJ, as its Senior Vice President - Legal. I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

- 1. Company will follow all applicable Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers, and the Florida Link-Up and Lifeline Program.
- 2. Company will follow all applicable FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service.
- 3. Company agrees that the Florida PSC may revoke a carrier's ETC status for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC status.
- 4. Company understands that if its petition for ETC status is approved, it will be for limited ETC status to provide Lifeline service only, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
- 5. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers.
- 6. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC to:

Florida Public Service Commission Division of Regulatory Analysis, Market Practices Section 2540 Shumard Oak Drive Tallahassee, Florida 32399-0850

7. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bill, \$3.50 of which is

Date: April 23, 2010

provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a mislemeanor of the second degree.

March 9, 2010

Signature Peter Lurie

Business Address: 10 Independence Blvd. Warren, NJ 07059

ABDLFLXA	BYSHFLXA	DRBHFLMA
ALCHFLXA	CCBHFLAF	DUNDFLXA
ALFAFLXA	CCBHFLMA	DWPKFLXA
ALFRFLXA	CDKYFLMA	DYBHFLFN
ALSPFLXA	CFLDFLMA	DYBHFLMA
ALTRFLXA	CFVLFLXA	DYBHFLOB
ALVAFLXA	CHLKFLXA	DYBHFLOS
ANMRFLXA	CHPLFLJA	DYBHFLPO
APPKFLXA	CHSWFLXA	EGLLFLBG
ARCDFLXA	CHTHFLXA	EGLLFLIH
ARCHFLMA	CITRFLXA	ENWDFLXA
ASTRFLXA	CLHNFLXA	EORNFLMA
AVPKFLXA	CLMTFLXA	ESTSFLXA
BAKRFLXA	CLTNFLXA	EVRGFLXA
		FHSDFLXA
BARTFLXA	CLWRFLXA	
BAYUFLXA	CNSDFLXA	FLBHFLMA
BBPKFLXA	CNTMFLLE	FLRHFLXA
BCGRFLXA	COCOFLMA	FRBHFLFP
BCRTFLBT	COCOFLME	FRPTFLXA
BCRTFLMA	CPCRFLXA	FRSTFLXA
BCRTFLSA	CPCRFLXB	FTGRFLMA
BGPIFLMA	CPHZFLXA	FTLDFLCR
BHPKFLXA	CRCYFLXA	FTLDFLCY
BKVLFLJF	CRRVFLXA	FTLDFLJA
BLDWFLMA	CRVWFLXA	FTLDFLMR
BLGLFLMA	CRWDFLXA	FTLDFLOA
BLTWFLXA	CSCYFLBA	FTLDFLPL
BLVWFLXA	CSLBFLXA	FTLDFLSG
BNFYFLXA	CTDLFLXA	FTLDFLSU
BNNLFLMA	CYGRFLXA	FTLDFLWN
BNSPFLXA	CYLKFLXA	FTMBFLXA
BORAFLXA	CYLKFLXB	FTMDFLXA
BRBAFLXA	DBRYFLDL	FTMYFLXA
BRFRFLXA	DBRYFLMA	FTMYFLXB
BRJTFLXA	DDCYFLXA	FTMYFLXC
BRKRFLXA	DELDFLMA	FTPRFLMA
BRNDFLXA	DESTFLXA	FTWBFLXA
BRSNFLMA	DFSPFLXA	FTWBFLXB
BRTNFLXX	DLBHFLKP	FTWBFLXC
BSHNFLXA	DLBHFLMA	FTWHFLXA
BVHLFLXA	DLSPFLMA	GCSPFLCN
BWLGFLXA	DNDNFLXA	GCVLFLMA
BYBHFLMA	DNLNFLWM	GDRGFLXA
GENVFLMA	JCBHFLMA	LKWLFLXE
GLBRFLMC	JCBHFLSP	LLMNFLXA
GLDLFLXA	JCVLFLAR	LNLKFLXA

GLGCFLXA	JCVLFLBW	LRGOFLXA
GLRDFLXA	JCVLFLCL	LRVLFLXA
GNBOFLXA	JCVLFLFC	LSBGFLXA
GNDYFLXA	JCVLFLIA	LUTZFLXA
GNVLFLXA	JCVLFLJT	LVOKFLXA
GNWDFLXA	JCVLFLLF	LWTYFLXA
GRETFLXA	JCVLFLNO	LYHNFLOH
GSVLFLMA	JCVLFLOW	MALNFLXA
GSVLFLNW	JCVLFLRV	MAYOFLXA
GVLDFLXA	JCVLFLSJ	MCINFLXA
HAVNFLMA	JCVLFLSM	MCLNFLXA
HBSDFLMA	JCVLFLWC	MCNPFLMA
HDSNFLXA	JNGSFLXA	MDBGFLPM
HGLDFLXA	JPTRFLMA	MDSNFLXA
HGSPFLXA	JSPRFLXA	MIAMFLAE
HLNVFLMA	KGLKFLXA	MIAMFLAL
HLRDFLXA	KNVLFLXA	MIAMFLAP
HLWDFLHA	KSSMFLXA	MIAMFLBA
HLWDFLMA	KSSMFLXB	MIAMFLBC
HLWDFLPE	KSSMFLXD	MIAMFLBR
HLWDFLWH	KYHGFLMA	MIAMFLCA
HMSPFLXA	KYLRFLLS	MIAMFLDB
HMSTFLEA	KYLRFLMA	MIAMFLFL
HMSTFLHM	KYSTFLXA	MIAMFLGR
HMSTFLNA	KYWSFLMA	MIAMFLHL
HNCYFLXA	LBLLFLXA	MIAMFLIC
HNCYFLXN	LDLKFLXA	MIAMFLKE
HOWYFLXA	LEE FLXA	MIAMFLME
HSNGFLXA	LGBKFLXA	MIAMFLNM
HTISFLMA	LHACFLXA	MIAMFLNM
	LKALFLXA	MIAMFLOL
HWTHFLMA		
HYPKFLXA	LKBNFLXB	MIAMFLPB MIAMFLPL
IMKLFLXA	LKBRFLXA	
INLKFLXA	LKBTFLXA	MIAMFLRR
INRKFLXX	LKCYFLMA	MIAMFLSH
INTRFLXA	LKHLFLXA	MIAMFLSO
INTWFLXA	LKLDFLXA	MIAMFLWD
INVRFLXA	LKLDFLXE	MIAMFLWM
IONAFLXA	LKLDFLXN	MICCFLBB
ISLMFLMA	LKMRFLHE	MLBRFLMA
JAY FLMA	LKPCFLXA	MLBYFLXA
JCBHFLAB	LKWLFLXA	MLRSFLXA
MLTNFLRA	ORCYFLXC	PSDNFLXA
MNDRFLAV	ORLDFLAP	PTCTFLXA
MNDRFLLO	ORLDFLCL	PTCYFLXA
MNDRFLLW	ORLDFLMA	PTSJFLXA

MNLKFLXA	ORLDFLPC	PTSLFLMA
MNSNFLMA	ORLDFLPH	PTSLFLSO
MNTIFLXA	ORLDFLSA	QNCYFLXA
MOISFLXA	ORPKFLMA	RAFRFLXA
MOLNFLXA	ORPKFLRW	RSKNFLXA
MRDCFLXA	ORSPFLXA	RYHLFLXA
MRHNFLXA	OSPRFLXA	SARKFLXA
MRNNFLXA	OVIDFLCA	SBNGFLXA
MRTHFLVE	PACEFLPV	SBSTFLFE
MTDRFLXA	PAHKFLMA	SBSTFLMA
MTLDFLXA	PANCFLXA	SCPKFLXA
MTVRFLXA	PCBHFLNT	SEKYFLXA
MXVLFLMA	PKCYFLXA	SGBEFLXA
MYCYFLXA	PLCSFLMA	SGBHFLXA
NDADFLAC	PLMTFLXA	SGKYFLMA
NDADI LAC NDADFLBR	PLSLFLXA	SHLMFLXA
NDADFLGG NDADFLGG	PLTKFLMA	SKWYFLXA
	PMBHFLCS	SLHLFLXA
NDADFLOL NFMYFLXA		SLSPFLXA
	PMBHFLFE	
NFMYFLXB	PMBHFLMA	SMNLFLXA
NGBHFLXA	PMBHFLNP	SNANFLXA
NKLRFLMA	PMBHFLTA	SNDSFLXA
NNPLFLXA	PMPKFLMA	SNFRFLMA
NPLSFLXC	PNCRFLXA	SNISFLXA
NPLSFLXD	PNCYFLCA	SNRSFLXA
NPRCFLXA	PNCYFLMA	SNSNFLXA
NRPTFLXA	PNGRFLXA	SNSPFLXA
NRSDFLXA	PNISFLXA	SPBGFLXA
NSBHFLMA	PNLNFLXA	SPBGFLXS
NWBYFLMA	PNLSFLXA	SPCPFLXA
OCALFLXA	PNSCFLBL	SPRGFLXA
OCALFLXB	PNSCFLFP	SRSTFLXA
OCALFLXC	PNSCFLHC	SSDSFLXA
OCALFLXJ	PNSCFLPB	SSPRFLXA
OCNFFLXA	PNSCFLWA	STAGFLBS
OKCBFLXA	PNVDFLMA	STAGFLMA
OKHLFLMA	POINFLXA	STAGFLSH
OKLWFLXA	PRRNFLMA	STAGFLWG
OLDSFLXA	PRRYFLXA	STCDFLXA
OLTWFLLN	PRSHFLXA	STGRFLXA
ORCYFLXA	PRSNFLFD	STMKFLXA
STRKFLXA	WNGRFLXA	SVSSFLXA
STRTFLMA	WNHNFLXC	SWTHFLXA
SVSPFLXA	WNPKFLXA	SYHSFLCC
TAFBFLXA	WPBHFLHH	
TAMPFLXE	WPBHFLLE	
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Attachment B

Docket No. 090245-TP Date: April 23, 2010

TAMPFLXX THNTFLXA TLCHFLXA TLHSFLXA TLHSFLXB TLHSFLXC TLHSFLXD TLHSFLXE TLHSFLXF TLHSFLXG TLHSFLXH **TMTRFLXA TRENFLMA TRSPFLXA TTVLFLMA TVRSFLXA UMTLFLXA** UNVRFLXA **VENCFLXA VENCFLXS VERNFLMA VLPRFLXA VLPRFLXB VRBHFLBE VRBHFLMA** WALDFLXA **WCHLFLXA WELKFLMA** WHSPFLXA WIMMFLXA WLBRFLXA **WLCHFLXA WLCRFLXA WLHLFLXA WLSTFLXA** WLWDFLXA WNDRFLXA WPBHFLAN **WPBHFLGA WPBHFLGR**

WPBHFLRB
WPBHFLRP
WSSDFLXA
WSTVFLXA
WWSPFLHI
WWSPFLSH
YBCTFLXA
YNFNFLMA
YNTWFLMA
YULEFLMA
ZLSPFLXA
ZPHYFLXA