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August 12, 2016

Ms. Carlotta Stauffer
Director, Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Via Hand Delivery

REDACTED

RECEIVED-FPSC
2016 AUG 12 PM 3:05
COMMISSION
CLERK

Re: Virgin Mobile USA, L.P. Response to 2016 Lifeline Data Request

Dear Ms. Stauffer:

Although wireless Eligible Telecommunications Carriers no longer fall under the jurisdiction of the Florida Public Service Commission, as a courtesy Virgin Mobile USA, LP ("Virgin Mobile") provides the enclosed responses to Staff's 2016 Lifeline Data Request regarding annual reporting for Eligible Telecommunications Carriers that receive low-income support.

Enclosed for filing are:

1. Redacted Attachment A: Virgin Mobile's redacted response to Staff's data request, pursuant to Rule 25-22.006(5), Florida Administrative Code, and
2. Confidential Attachment B: a sealed envelope marked "CONFIDENTIAL," containing confidential portions of Virgin Mobile's response.

Pursuant to §364.183(1), Florida Statutes, Virgin Mobile claims that the highlighted portions of the documents provided in Confidential Attachment B are confidential and proprietary business information of Virgin Mobile that should be kept confidential and exempt from public disclosure.

Thank you for your assistance in this matter. Please date stamp the enclosed additional copy of this letter as "filed" and return the same of my office. Please do not hesitate to contact me if you have any questions, or you may reach John Monroe, in-house counsel for Sprint and Virgin Mobile, (404) 649-8983, or by email at John.Monroe@sprint.com.

RUTLEDGE ECENIA

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Sincerely



Marsha E. Rule

cc: Beth Salak

RUTLEDGE ECENIA

**REDACTED
ATTACHMENT "A"**

TO

**VIRGIN MOBILE USA, L.P.'S
RESPONSE TO 2016 LIFELINE DATA
REQUEST**

**** REDACTED ****
VIRGIN MOBILE USA, LP'S RESPONSE TO
FLORIDA CLEC AND WIRELESS LIFELINE DATA REQUEST 2016

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2016. Your response should include your company name, contact person, and email address.**

For items 1 through 16, please provide the data for the fiscal year July 1, 2015, through June 30, 2016.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

RESPONSE: As a wireless-only provider, Virgin Mobile does not have any "residential access lines."

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or customers provided Lifeline through resold Lifeline access lines.

RESPONSE: Please see Schedule 1.

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

RESPONSE: In July 2015, Virgin Mobile offered its customers a free phone plus 250 free minutes and unlimited free text messages each month. In August, 2015 and continuing through the end of the specified period, Virgin Mobile changed its basic offer to include a free phone plus 350 minutes and unlimited free texts each month.

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

RESPONSE: See confidential chart below:

Description	Total
ADDRESS document(s) not on acceptable list of Proof of Address. Please submit application with another Proof of Address document	██████████
Address on document doesn't match application	██████████
Application removed due to an existing application or account with matching some CPNI information - name, DOB, SSN.	██████████
Application was submitted with extra letters and/or characters in one of the name fields	██████████
Bank statement not acceptable	██████████
Date of birth could not be validated	██████████
Denied for duplicate application	██████████
Did not indicate Date of Birth and/or complete Social Security Number	██████████

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Did not indicate Date of Birth and/or last 4 numbers of Social Security Number	██████████
Did not provide 3 full months or 12 weeks of income documentation	██████████
Document does not prove eligibility for any LL program. Please resubmit with valid eligibility document.	██████████
Document(s) provided does not meet program guidelines	██████████
Documentation must be in English or Spanish	██████████
Documentation of power of attorney or guardianship not provided when it was indicated	██████████
Documentation submitted is not for an eligible program listed on application	██████████
Documentation to support income-based eligibility was not received	██████████
Documentation to support program-based eligibility was not received	██████████
Does not meet age requirement	██████████
Expired document used. Please submit with valid document	██████████
Failed to check all required statements in signature section	██████████
Identity could not be found in public and governmental records. Full name, DOB, last 4 SSN, and address will need to be verified.	██████████
Identity could not be found in public and governmental records. Full name, DOB, last 4 SSN, and address will need to be verified	██████████
IDENTITY document(s) not on acceptable list of Proof of Identity. Please submit application with another Proof of Identify document	██████████
Income documentation provided does not include dates. Dated documentation is required	██████████
Income documentation provided does not include gross income data, income before taxes and deductions	██████████
Income documentation provided is too old/outdated	██████████
Income does not meet eligibility guidelines	██████████
Incomplete First or Last Name	██████████
Lifeline account already exists – No evidence the USAC Economic worksheet was received by the required deadline.	██████████
Lifeline account already exists – Not enough information to determine your eligibility as a separate household at this address.	██████████
Lifeline service not available in this area	██████████
Multiple household sizes were selected, only 1 may be chosen	██████████
Must complete updated application. Application submitted is out dated.	██████████
Must complete updated Service Request Form	██████████
Must provide single applicant name (multiple were provided)	██████████
Name change no documentation	██████████
Name change no signature	██████████
Name on document(s) doesn't match application. Please submit application with correct name.	██████████

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Name or SSN4 could not be validated	██████████
NLAD Denied. Do not resubmit application	██████████
NLAD Unvalidated Address	██████████
No evidence a Re-certification Form was returned	██████████
No evidence that you returned a new state application after your relocation by the deadline.	██████████
No evidence the USAC Economic worksheet was received by the required deadline.	██████████
PO BOX/General Delivery not acceptable as service address	██████████
Program documentation submitted is expired	██████████
Program information provided does not match applicant's name and/or address	██████████
Remove Me From Program	██████████
Signature on form does not match applicant's name	██████████
Signature on form does not match applicant's name.	██████████
Supporting document is unreadable	██████████
Supporting document is unreadable/blurry. Please submit with a clear image	██████████
The address you provided was incomplete.	██████████
Unreviewable	██████████
USAC does not pass	██████████
We have determined you have already been approved with another Lifeline carrier within the past 60 days.	██████████
We regret to inform you that you have been transferred to another carrier	██████████
We were not able to verify that you live at the home address you listed based on the documentation with your Address Verification Form	██████████
You did not select a program or number of family members.	██████████
Your personal information (name, date of birth, social security number) couldn't be verified in the database.	██████████
Your signature was missing or unreadable on the application	██████████
Your signature was missing or unreadable on the application.	██████████
Your signature was missing or unreadable on the Attestation/Service Authorization Form.	██████████

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or customers provided Lifeline through resold Lifeline access lines.

RESPONSE: Please see Schedule 1.

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6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold Lifeline access lines, or Lifeline customers moved to Transitional Lifeline.

RESPONSE: Please see Schedule 1.

7. The number of customers participating in Transitional Lifeline each month.

RESPONSE: Please see Schedule 1.

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

RESPONSE: Please see Schedule 1.

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

RESPONSE: No Lifeline service was provided through resale agreements.

10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.

RESPONSE: Virgin Mobile does not receive applications directly from the Office of Public Counsel and is currently working with the Office of Public Counsel ("OPC") to develop a mechanism for OPC to verify Virgin Mobile customers that qualify for Lifeline on the basis of income.

- b. Procedures used to process applications received directly from customers.

RESPONSE: The applicant returns the completed application to the address on the application. The application and any required documentation provided by the customers are scanned. An electronic platform compares the information supplied by the applicant with state specific program information and a preliminary eligibility decision is recommended. If the applicant is applying based on a Program on the Florida State Database, the Florida Database is checked. If an "eligible" response is received from the Florida Database, then the applicant is "approved", otherwise, a reviewer then manually reviews and evaluates the application for completeness and compares the eligibility requirements to the application and supporting documentation and renders an approval or denial decision. A confirmation letter is then sent to the applicant with an eligibility decision. If the applicant was approved for participation in the program, an approval letter is sent. Simultaneously, a handset is shipped to the customer's address. If the applicant does not meet the eligibility requirements or the information was insufficient to render a decision, a denial letter will identify the reason for denial. Where information is insufficient to make an eligibility determination, a letter will request additional information.

- c. Procedures used to process applications received through the PSC on-line process.

RESPONSE: Virgin Mobile downloads a record from the PSC website that has all the necessary information to review an application (as shown below). These applicants have electronically signed and attested to the Lifeline rules.

- First Name
- Last Name
- DOB
- SSN
- Service Address, City and Zip code
- Program
- Telephone Number

Virgin Mobile then prints out the information where each applicant is put on a manual FL application (each application includes the sheet downloaded from the PSC website) for processing. The applications are then scanned and imported for Manual Data Entry, review, and/or processed for quality control based on our traditional process. The decisions related to these applications are then relayed in the print file to Sprint and decision letters are issued to the applicants.

- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.

RESPONSE: No applications were received through the DCF automatic enrollment process between July 1, 2015 and June 30, 2016.

- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

RESPONSE: The vast majority of applications are reviewed within 4 days of receipt. Eligibility determination letters are mailed approximately 10 days after the determination is reached. For approved customers, a handset is shipped simultaneous with the approval letter for delivery within 3-5 days. Once the customer activates that handset, the first month discount is applied in the form of 350 free voice minutes.

11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:

- a. Time period between initial certification and annual recertification.

RESPONSE: The entire Virgin Mobile Lifeline customer base is subject to verification annually at the time of each customer's service anniversary in accordance with the amended Lifeline rules. See 47 C.F.R. § 54.410(f). Customer eligibility is verified within one year following the initial certification.

- b. Method(s) used to verify customer eligibility.

RESPONSE: Upon receipt of an application, Virgin Mobile first checks the National Lifeline Accountability Database to validate the applicant's identity and ensure that the residential address is not in use by another Lifeline customer. If the applicant passes

this check, Virgin Mobile reviews the application for completeness and determines eligibility based on documents provided as proof of program participation or income. If a state database or similar resource is available to verify the applicant's eligibility based on program participation or income, Virgin Mobile checks that resource for further verification of eligibility.

12. Description of your company's procedures for Lifeline. Include the following in your response:

- a. Internal procedures for promoting Lifeline.

RESPONSE: Virgin Mobile has over one hundred toll-free numbers as contact points for Lifeline inquiries with the ability to be transferred for Spanish language information. Specialized call center advisors have information regarding Lifeline service available.

- b. Outreach and educational efforts involving participation in community events.

RESPONSE: From time to time, Virgin Mobile promotes its Assurance Wireless-branded Lifeline service at community events that are targeted to potential Lifeline eligible customers.

- c. Outreach and educational efforts involving mass media (newspaper, radio, television).

RESPONSE: Virgin Mobile advertises its Lifeline services using media of general distribution throughout its service area. The Company advertises the availability of its Lifeline services through television, radio, the Internet, and direct mail. These advertising campaigns have been highly effective in reaching low-income customers and promoting the availability of cost-effective wireless services to Lifeline eligible customers.

- d. Copies of Lifeline outreach materials of your company.

RESPONSE: In addition to our website, please see Attachment 2 for copies of outreach materials.

- e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

RESPONSE: Currently, Virgin Mobile is not partnering with any organizations.

13. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

RESPONSE: Virgin Mobile's Lifeline branded service, Assurance Wireless, has dedicated customer care representatives. These representatives receive training on the complete Assurance Wireless customer experience and do not use a script.

14. Please provide any link on your Web site that provides Lifeline information.

RESPONSE: www.assurancewireless.com

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15. Did your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

RESPONSE: As a wholly-owned subsidiary of Sprint, Virgin Mobile has beneficial use of the Sprint wireless network and, thus, provides services using its own facilities. All Virgin Mobile Lifeline customers are provided services through this network.

16. Do you anticipate offering and seeking reimbursement for Basic Internet Access Services (BIAS) in Florida as part of the Lifeline Program? If yes, please project when you will offer BIAS and when you will seek reimbursement for it.

RESPONSE: Virgin Mobile has not yet determined what its Lifeline service offerings will be under the revised Lifeline regulations, including whether or when it may offer Broadband Internet Access Service.

17. Do you see any impediments in the implementation to the FCC's new Lifeline Order (FCC 16-38)?

RESPONSE: No, Virgin Mobile does not see any impediments in the implementation to the FCC's new Lifeline Order.

18. To the extent you have experienced a decline in Lifeline customers, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting the Lifeline participation in Florida are welcome.

RESPONSE: Not applicable. Virgin Mobile has not experienced a decline in Lifeline customers.

**2016 Florida Lifeline Data Request
Virgin Mobile USA, L.P.**

REDACTED

SCHEDULE 1

	2. # of customers participating in Lifeline each month	# of customers participating in Link-Up each month ¹	4. # of customers denied Lifeline service	5. # of Lifeline customers added each month	# of Link-Up customers added each month ¹	6. # of Lifeline customers removed from Lifeline each month	7. # of customers participating in Transitional Lifeline each month	8. # of customers participating in Lifeline under Tribal Lands provision each month
Jul-2015								
Aug-2015								
Sep-2015								
Oct-2015								
Nov-2015								
Dec-2015								
Jan-2016								
Feb-2016								
Mar-2016								
Apr-2016								
May-2016								
Jun-2016								

1. Virgin Mobile USA does not charge its Lifeline customers an activation fee, therefore, it does not participate in Link-Up.

RUTLEDGE ECENIA

**CONFIDENTIAL
ATTACHMENT "B"**

TO

**VIRGIN MOBILE USA, L.P.'S
RESPONSE TO 2016 LIFELINE DATA
REQUEST**