

August 16, 2018

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DOCUMENT NO. 05383-2018
FPSC - COMMISSION CLERK

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

REDACTED

Re: Virgin Mobile's Response to Florida Lifeline Data Request 2018

Dear Ms. Stauffer:

Although wireless Eligible Telecommunications Carriers no longer falls 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 2018 Lifeline Data Request regarding annual reporting for Eligible Telecommunication Carriers that receive low-income support.

Virgin Mobile USA is a wholly-owned subsidiary of Sprint Corporation. In order to ensure a timely response to the Commission's correspondence to Virgin Mobile, including data requests, please send it to Bill Atkinson, Sprint's Commission liaison.

Enclosed for filing are:

1. Public Attachment A: Virgin Mobile's redacted response to Staff's data request, as required by 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 highlights 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 the 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.

Sincerely,



Marsha E. Rule

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ATTACHMENT A
PUBLIC

**2018 Florida Lifeline Data Request
Virgin Mobile USA, L.P.**

SCHEDULE 1

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	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-2017	225,286	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Aug-2017	222,863	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Sep-2017	224,443	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Oct-2017	245,500	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Nov-2017	281,307	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Dec-2017	315,262	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Jan-2018	341,834	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Feb-2018	368,157	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Mar-2018	387,246	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Apr-2018	397,896	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
May-2018	411,930	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Jun-2018	418,874	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0

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

****REDACTED****

CLEC AND WIRELESS LIFELINE DATA REQUEST 2018

To assist the Florida Public Service Commission 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 16, 2018. 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, 2017, through June 30, 2018.

For those items requesting 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.

RESPONSE: Please see Schedule 1.

3. The amount of Lifeline credit per line provided to Lifeline customers on their monthly bill.

RESPONSE:

- During the specified time-period, Virgin Mobile base customers who used a feature phone received 500 minutes and unlimited free texts. Beginning on or before December 1, 2017, those customers received 750 minutes and unlimited free texts.

- During the specified time-period, Virgin Mobile base customers who used a smart phone received 350 minutes, unlimited free texts and 500MB of 3G or faster data each month. Beginning on or before December 1, 2017, those customers received 350 minutes, unlimited free texts and 1GB of 3G or faster data each month.

- New customers who enrolled between the start of the specified time period and November 30, 2017 received a free Android smart phone, 350 minutes, unlimited free texts and 500MB of 3G or faster data each month. On or before December 1, 2017, those customers began receiving 350 minutes, unlimited free texts and 1GB of 3G or faster data each month.

- New customers who enrolled on or after December 1, 2017 received a free Android smart phone, 350 minutes, unlimited free texts and 1GB of 3G or faster data 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).

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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	REDACTED
Address on document doesn't match application	REDACTED
Application removed due to an existing application or account with matching some CPNI information - name, DOB, SSN.	REDACTED
Application was submitted with extra letters and/or characters in one of the name fields	REDACTED
Bank statement not acceptable	REDACTED
Date of birth could not be validated	REDACTED
Denied for duplicate application	REDACTED
Did not indicate Date of Birth and/or last 4 numbers of Social Security Number	REDACTED
Did not provide 3 full months or 12 weeks of income documentation	REDACTED
Document does not prove eligibility for any LL program. Please resubmit with valid eligibility document.	REDACTED
Document(s) provided does not meet program guidelines	REDACTED
Documentation must be in English or Spanish	REDACTED
Documentation of power of attorney or guardianship not provided when it was indicated	REDACTED
Documentation submitted is not for an eligible program listed on application	REDACTED
Documentation to support income-based eligibility was not received	REDACTED
Documentation to support program-based eligibility was not received	REDACTED
Does not meet age requirement	REDACTED
Duplicate eligibility document used	REDACTED
Eligibility document ID missing or less than 6 characters	REDACTED
Expired document used. Please submit with valid document	REDACTED
Failed to check all required statements in signature section	REDACTED
Hourly app removal	REDACTED
Identity could not be found in public and governmental records. Full name, DOB, last 4 SSN, and address will need to be verified	REDACTED
IDENTITY document(s) not on acceptable list of Proof of Identity. Please submit application with another Proof of Identify document	REDACTED
Income documentation provided does not include dates. Dated documentation is required	REDACTED
Income documentation provided does not include gross income data, income before taxes and deductions	REDACTED
Income documentation provided is too old/outdated	REDACTED
Income does not meet eligibility guidelines	REDACTED
Incomplete First or Last Name	REDACTED
Lifeline account already exists – No evidence the USAC Economic worksheet was received by the required deadline.	REDACTED
Lifeline service not available in this area	REDACTED
Multiple household sizes were selected, only 1 may be chosen	REDACTED
Must complete updated application. Application submitted is out dated.	REDACTED
Must provide single applicant name (multiple were provided)	REDACTED
Name change no documentation	REDACTED

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Name on document(s) doesn't match application. Please submit application with correct name.	REDACTED
Name or SSN4 could not be validated	REDACTED
NLAD Denied. Do not resubmit application	REDACTED
NLAD Unvalidated Address	REDACTED
No evidence a Re-certification Form was returned	REDACTED
No evidence that you returned a new state application after your relocation by the deadline.	REDACTED
No evidence the USAC Economic worksheet was received by the required deadline.	REDACTED
PO BOX/General Delivery not acceptable as service address	REDACTED
Program documentation submitted is expired	REDACTED
Program information provided does not match applicant's name and/or address	REDACTED
Remove Me From Program	REDACTED
Same day app removal	REDACTED
Signature on form does not match applicant's name.	REDACTED
Supporting document is unreadable/blurry. Please submit with a clear image	REDACTED
The address you provided was incomplete.	REDACTED
Unreviewable	REDACTED
USAC does not pass	REDACTED
We have determined you have already been approved with another Lifeline carrier within the past 365 days.	REDACTED
We have determined you have already been approved with another Lifeline carrier within the past 60 days.	REDACTED
You did not select a program or number of family members.	REDACTED
Your personal information (name, date of birth, social security number) couldn't be verified in the database.	REDACTED
Your signature was missing or unreadable on the application.	REDACTED
Your signature was missing or unreadable on the Attestation/Service Authorization Form.	REDACTED

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

RESPONSE: Please see Schedule 1.

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

RESPONSE: Please see Schedule 1.

7. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

RESPONSE: Yes, please see Schedule 1. The 10c a minute plan is disclosed in our terms of service. In addition, we also provide notification to individual customers who become eligible for the transition service by virtue of them losing their lifeline eligibility.

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

RESPONSE: Please see Schedule 1.

9. Describe 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 paper and web applications are reviewed within 4 days of receipt. Eligibility determination letters are received by the applicant 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, unlimited messages and 1GB of 3G or faster data. Applications that are taken in real time with a sales agent are reviewed immediately and approved applicants receive their eligibility decision and their activated phone and service at the same time.

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

- a. Internal procedures for promoting Lifeline.

RESPONSE: Virgin Mobile has multiple 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 and television).

RESPONSE: In addition to the Assurance Wireless website, Assurance engages in digital advertising through tactics like search engine marketing, social media, and partnerships.

- 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. Any links on your company Web site that provides Lifeline information.

RESPONSE: Please refer to our website www.assurancewireless.com.

- f. 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 partnering with Medicaid providers on a national rollout. We also have partnerships with other companies that service the low-income population.

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

RESPONSE: No Lifeline service was provided through resale agreements.

12. To the extent you have experienced a decline in Lifeline customers since last year, 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 Lifeline participation in Florida are welcome.

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

13. Is your company currently providing Lifeline in any of the first six States that have transitioned to the National Verifier? If yes, please identify any issues you have experienced utilizing the National Verifier.

RESPONSE: Yes, we do provide Lifeline service in states that have transitioned to the National Verifier; however, participation in the soft launch of the National Verifier is optional. That, coupled with the “no notice” launch timing and the short notification period to comply with the Universal Forms that became effective July 1 has delayed our participation.

14. Did your company elect to participate in USAC recertification of Lifeline consumers for 2018?

RESPONSE: No, Virgin Mobile did not.

15. If you elected USAC recertification, are you aware that in order to elect for 2019 recertification you must fill out the forms on USAC’s website between July 16, 2018 and August 31, 2018?

RESPONSE: Not applicable.

16. Have you switched to using the new National Lifeline Application/Recertification forms in Florida?

RESPONSE: Yes, Virgin Mobile has switched.

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17. The Lifeline Modernization Order of 2016 requires ETC's to offer Broadband Internet Access Services. To the extent that you are not offering Broadband Internet Access Services, have you submitted a forbearance notification to the FCC? If yes, please provide the date of your submission.

RESPONSE: Virgin Mobile offers Basic Internet Access Services in Florida as part of the Lifeline Program; however, we do not seek reimbursement from the state of Florida. We offer 1GB of 3G or faster data along with a free Android device to every new customer, and 1GB of 3G or faster data to existing customers with smart phones, so we are in full compliance with the Lifeline Modernization Order. No forbearance notification needed.

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wireless **Virgin** mobile
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NEW ELIGIBLE CUSTOMERS

FREE
1GB Data

Each Month (High-Speed Data)

&

350 Voice Minutes
Unlimited Texts

NEW!
OUR BEST
OFFER YET!

Plus a **FREE**
Android™ Smartphone



See representative for details.

**If Approved, Get a FREE
Smartphone The Same Day!**

FREE Each Month to Qualifying
Low-income Households

Eligible Customer Also Receive:

- No Annual Contract
- Nationwide Sprint® Network
- Voicemail, Call Waiting & Caller ID
- 911 Access
- **NEW!** International Talk & Text Offers at great, low rates

Customers can buy more data for less than
any major Lifeline plan*

*Compared to SafeLink Wireless plans outside of California and Q Link Wireless plans as of 8/16/17

Find Out If You Qualify Today.

Assurance Wireless is a federal Lifeline Assistance program. Lifeline Assistance is a government assistance program supported by the Universal Service Fund.

Enrollment is available to individuals who qualified based on federal or state-specific eligibility criteria. You may qualify based on household income or if you participate in certain public assistance programs like Medicaid, Food Stamps/SNAP or SSI. You must provide proof of income or proof of program participation.

The Lifeline Assistance program is available for only one wireless or wireline account per household.

Effective 12/2/16, the Lifeline rules permit Lifeline-eligible consumers to apply their Lifeline benefit to Broadband internet plans. Under the rules, once you have enrolled in a Lifeline-supported broadband plan with one carrier, you will need to wait 12 months before transferring your benefit to a new carrier. Assurance Wireless will become your Lifeline broadband provider for 12 months from the date of enrollment, subject to limited exceptions. For more information, visit <http://www.lifelinesupport.org/lis/changes-to-lifeline.aspx>

Offer limited to new eligible customers who are approved for Lifeline service residing in selected geographic areas and is non-transferable. One Lifeline discounted service (landline or wireless) is available per household. A household is defined as any individual or group of individuals who live together at the same address and share income and expenses. For additional details on competitive plans please visit their respective websites. Device speeds may vary. Offers not available in all states/areas and may vary by state. Visit assurancewireless.com for the offer available in your state. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Phone models based on availability and may vary depending on inventory. Add'l voice: 10c/min. Int'l & Data services may be extra per plan. Accessing voicemail draws from plan minutes & charges may apply once free minutes have been depleted. Customers de-enrolled from the federal Lifeline program may use service with funds remaining in the account for max. 150 days, after which account expires and balance is forfeited unless customer adds funds to the account. State and local sales taxes and fees may apply. Assurance Wireless reserves the right to modify, extend or cancel offers at any time. Coverage not available everywhere. Nationwide coverage area reaches more than 295 million people. Virgin Mobile® USA network services are provided on the Nationwide Sprint® Network. Assurance Wireless is subject to Important Service/Product and General Terms of Conditions found on assurancewireless.com. Third Party Products and Services: Assurance Wireless devices provide the ability to purchase from Third Parties (not Assurance) mobile apps and other digital content/services, tangible goods, and to make donations. Payments for purchased mobile content are deducted from the account balance and charges display in the online account. You can block the ability to make such purchases at no cost by calling Customer Care. ©2017 Sprint. All rights reserved. Sprint, the logo and Sprint Spark are trademarks of Sprint. Android, Google, the Google logo and Google Play are trademarks of Google Inc. Other marks are the property of their respective owners.

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assurance

wireless **Virgin** mobile
traído a usted por

NUEVOS CLIENTES ELEGIBLES

1GB de datos GRATIS cada mes
(Datos de alta velocidad)

&

350 Minutos de Voz
Textos sin límite

¡NUEVOS!
¡Nuestra mejor oferta hasta la fecha!

Más un teléfono inteligente Android™ GRATIS



Vea a un representante para más detalles.
Si es aprobado, obtén un teléfono inteligente GRATIS, el mismo día!

GRATIS cada mes para hogares de bajos ingresos que califiquen

Cientes elegibles también reciben:

- Sin contrato anual
- Cobertura en la Red Nacional de Sprint®
- Correo de voz, llamada en espera e identificador de llamada
- Acceso al 911
- **¡NUEVO!** Ofertas para llamadas y mensajes de texto internacionales a excelentes precios bajos

Los clientes pueden comprar más data por menos que otros planes Lifeline*

*Comparado a planes de SafeLink Wireless fuera de California y planes de Q Link Wireless desde el 8/16/17

Entérese hoy mismo si usted es elegible

Assurance Wireless es un programa federal de asistencia Lifeline. La asistencia Lifeline es un programa de asistencia gubernamental apoyado por el Fondo de Servicio Universal federal.

La inscripción en el programa está disponible para individuos que reúnan los requisitos de elegibilidad federales o específicos del estado. Usted podría calificar con base en el ingreso de su grupo familiar o si participa en determinados programas de asistencia pública tales como Medicaid, Cupones para Alimentos/SNAP o SSI. Debe proporcionar comprobante de participación en el programa o comprobante de ingreso.

El programa de asistencia Lifeline está disponible sólo para una línea de teléfono, fija o móvil, por grupo familiar.

del 12/2/16, las reglas de Lifeline permiten a los clientes elegibles de Lifeline aplicar sus beneficios Lifeline a planes de internet de banda ancha. Bajo estas reglas, una vez usted se haya inscrito con algún proveedor a un plan de banda ancha compatible con Lifeline, usted necesitará esperar 12 meses antes de poder transferir su beneficio a su nuevo proveedor. Assurance Wireless se convertirá en su proveedor Lifeline de banda ancha durante 12 meses a partir de la fecha de inscripción, sujeto a excepciones limitadas. Para más información, visite <http://www.lifelinesupport.org/ls/changes-to-lifeline.aspx>

Oferta limitada a nuevos clientes elegibles que sean aprobados para el servicio Lifeline que residen en determinadas áreas geográficas y no es transferible. Solo un servicio Lifeline con descuento (línea fija o móvil) es permitido por hogar. Un hogar se compone de uno o más individuos que viven juntos en la misma dirección y que comparten ingresos y gastos. Para más detalles sobre los planes de la competencia visite sus páginas webs respectivas. Las velocidades del dispositivo pueden variar. La oferta no está disponible en todos los estados/áreas y puede variar por estado. Visite assurancewireless.com para ver la oferta disponible en su estado. Los clientes que deliberadamente se valgan de declaraciones falsas para obtener los beneficios pueden ser castigados con multa o prisión, o pueden ser excluidos del programa. La disponibilidad de los modelos de teléfonos puede variar y se basa en las existencias de inventario. Minutos de voz adicionales: 10¢/min. Los servicios internacionales y de transferencia de datos pueden tener un costo adicional de acuerdo al plan. El acceso al correo de voz utiliza minutos del plan y se pueden aplicar cargos una vez que los minutos gratis se hayan agotado. Clientes que ya no están inscritos en el programa Lifeline federal podrán usar el servicio con los fondos restantes en la cuenta por un máximo de 150 días, después de los cuales la cuenta expira y el balance es anulado al menos que el cliente añada fondos a la cuenta. Pueden aplicarse cargos e impuestos sobre las ventas locales y estatales. Assurance Wireless se reserva el derecho de modificar, extender o cancelar ofertas en cualquier momento. La cobertura no está disponible en todas partes. El área de cobertura nacional llega a más de 295 millones de personas. Los servicios de red de Virgin Mobile® USA son suministrados a través de la Red Nacional de Sprint®. Assurance Wireless está sujeto a los Términos de Condiciones Importantes de Servicio/Producto y Generales encontrados en <http://assurancewireless.com>. Productos y Servicios de terceros: Los dispositivos de Assurance Wireless ofrecen la opción de comprar de terceros (no Assurance) aplicaciones móviles y otros contenidos/servicios digitales y bienes tangibles y también la opción de hacer donaciones. Pagos por el contenido móvil son descontados del saldo de la cuenta y los cargos se mostrarán en su cuenta por internet. Usted puede bloquear la opción de hacer estas compras a ningún costo llamando a Atención al Cliente. ©2017 Sprint. Todos los derechos reservados. Sprint, el logo y Sprint Spark son marcas comerciales de Sprint. Android, Google, el logo de Google y Google Play son marcas registradas de Google Inc.