## Before the

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

		and state	900	
In the Matter of	) ) )		NOV -5	
Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purpose of Offering Lifeline Service to Qualified Households	) ) ) )	Docket No. UT-0930	2AH 9: 21	

## TRACFONE WIRELESS, INC.'S THIRD AMENDMENT TO PETITION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

TracFone Wireless, Inc. ("TracFone"), by its undersigned counsel, hereby amends its Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Washington to clarify the options a SafeLink Wireless Lifeline customer has for purchasing additional minutes of airtime.

By this amendment, TracFone clarifies that it is not offering \$3, \$5, and \$10 cards to Lifeline customers, as was indicated in its ETC Petition, and it will not be offering such cards in Washington. Lifeline customers may purchase any TracFone prepaid airtime card products and use those airtime cards to add minutes to their handsets. For any TracFone prepaid airtime card that reflects a per minute rate of more than \$0.20, when a SafeLink Wireless Lifeline customer activates the card, the number of minutes will be adjusted to provide the \$0.20 per minute rate to that customer. For example, if a customer purchases a 60 minute card for \$19.99 (a per minute rate of \$0.33), TracFone's proprietary software will automatically detect that the airtime card is being purchased by a customer whose telephone number is associated with a SafeLink Wireless Lifeline account and will automatically add 40 minutes so that the customer receives a total of

100 minutes. Therefore, TracFone's Lifeline customers will pay a maximum of \$0.20 per minute for additional airtime minutes. This arrangement is being utilized in lieu of the low volume usage cards initially proposed because TracFone encountered difficulties in securing commitments from retail vendors to sell the low volume cards at their retail locations. The number of minutes that a Lifeline customer will receive with each purchase of a TracFone prepaid minutes card is disclosed in the SafeLink Wireless terms and conditions.

Respectfully submitted,

Mitchell F. Brecher Debra McGuire Mercer

GREENBERG TRAURIG, LLP 2101 L Street, NW Suite 1000 Washington, D.C. 20037 (202) 331-3100

Counsel for TracFone Wireless, Inc.

November 4, 2009