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*via web portal*

February 5, 2010

Mr. David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
Olympia, Washington 98504

RE: Petition of TracFone Wireless, Inc. for Designation as an Eligible  
Telecommunications Carrier, Docket UT-093012

Dear Mr. Danner:

Attached for filing in the above-referenced docket is TracFone Wireless, Inc.'s plan for implementation of the Straight Talk® options for Lifeline customers. TracFone agreed to offer these options in an amendment to its petition filed December 28, 2009.

The document is designated as confidential pursuant to WAC 480-07-160, because it contains valuable commercial information, including trade secrets and confidential marketing information. TracFone Wireless, Inc., would be directly and adversely affected by disclosure of the confidential information. A redacted copy, consisting only of the cover page of the document, is also attached.

This filing is made in response to staff's request for a more detailed description of the Straight Talk® Lifeline options.

TracFone has not offered Straight Talk® options to Lifeline customers in any of the 24 states where it has been designated as an eligible telecommunications carrier. The implementation of these options will require a significant effort on the part of TracFone and its vendors and retailers. In its February 2, 2010 filing, TracFone indicated that it would be able to offer the Straight Talk® options within 90 days of its ETC designation in the state of Washington.

TracFone is committed to offering the Straight Talk® options as soon as possible. However, based on its ongoing work to define the implementation project, TracFone has determined that the 90-day target is not feasible. Therefore, TracFone commits to commencing the availability to Washington consumers of the Lifeline versions of its Straight Talk® plans within four months of its designation as an ETC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Blackmon". The signature is stylized and written in a cursive-like font.

Glenn Blackmon  
on behalf of  
TracFone Wireless, Inc.