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Utilities and Transportation Division

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December 13, 2010

David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Virgin Mobile USA L.P.'s Compliance Filing, Docket UT-100203


Dear Mr. Danner:

Pursuant to Washington State Condition #2 of Commission Order 01 (Appendix B) in this docket, Virgin Mobile USA L.P. (Virgin Mobile) submitted a compliance filing on November 16, 2010, for approval by the Commission. The Company's compliance filing contains a copy of Virgin Mobile's Lifeline rate plans, terms and conditions, proposed language to be used in direct marketing and advertising material, and its Lifeline Customer Enrollment Form. Staff has reviewed the compliance filing and discussed it with the Company's representatives. Based on Staff's suggestions, Virgin Mobile submitted revisions to the compliance filing on December 3, 2010, and December 10, 2010. Staff finds that the Company's final revised compliance filing is satisfactory and meets the condition set forth in the Commission's Order 01. Staff, therefore, recommends that the Commission approve Virgin Mobile's compliance filing so that Virgin Mobile can start offering its Assurance Wireless Lifeline service.

Virgin Mobile also informed the Commission that it has started discussions with the Department of Social and Health Services (DSHS) regarding access to the DSHS database to verify Virgin Mobile Lifeline customers' eligibility. This complies with Condition #10 of Commission Order 01.

Staff suggested that Virgin Mobile add the DSHS Client identifier to its Lifeline Customer Enrollment Form. With this information, DSHS can perform the annual audit on Lifeline customers' eligibility more efficiently. The Company indicated that it needs more time to upgrade its customer database to incorporate this change. Staff recommends that the Commission approve Virgin Mobile's Lifeline Customer Enrollment Form now, and allow the Company to implement the change in its database to add the DSHS Client identifier by the end of the first quarter 2011, as requested by the Company.

Sincerely,


GREGORY J. TRAUTMAN
Assistant Attorney General