

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	DOCKET No. _____
PETITION OF ASSURANCE WIRELESS USA, L.P., TO EXPAND ITS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATED SERVICE AREA	Petition of Assurance Wireless USA, L.P., to Expand Its Eligible Telecommunications Carrier Designated Service Area

**PETITION OF ASSURANCE WIRELESS USA, L.P. TO EXPAND
ITS ELIGIBLE TELECOMMUNICATIONS CARRIER
DESIGNATED SERVICE AREA**

I. INTRODUCTION

1. Assurance Wireless USA, L.P. (“Assurance Wireless” or “the Company”), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”), and Washington Administrative Code (“WAC”) 480-123-030, respectfully submits this Petition to the Washington Utilities and Transportation Commission (“Commission” or “WUTC”) to expand its Eligible Telecommunications Carrier (“ETC”) designated service area for Lifeline only services in the state of Washington in a number of additional wire centers within its coverage area and also for tribal areas within its ETC designated service area as described below.

2. All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to the following attorneys on behalf of Assurance Wireless:

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3. The Commission previously designated Assurance Wireless (formerly Virgin Mobile) as an ETC for Low Income Support¹ from the federal Universal Service Fund on November 10, 2010, in Order 01 in Docket UT-100203. On November 14, 2011, Virgin Mobile filed a petition with the Commission to renew its designation as an ETC pursuant to Section 214(e)(2) of the Communications Act of 1934 and WAC 480-123, and on October 16, 2014, in Order 02 in the same Docket, the Commission granted an order renewing eligible telecommunications carrier designation and continued exemption from WAC 480-123-030(1)(d) with amended conditions (hereinafter “2014 Designation Order”). The Commission’s 2014 Designation Order limited Assurance Wireless’ designated service area to wire centers listed in Attachment B to Order 2. However, at Virgin Mobile’s request, the Order did not approve serving tribal areas that may have been within those wire centers. On March 31, 2025, Assurance Wireless filed a second petition to expand its designated ETC area to reflect expanded wireless coverage. The petition expressly noted that it had excluded tribal lands from its proposed ETC expansion. The matter was docketed as UT-250220. On June 12, 2025, in Order 01, the Commission granted the petition to expand Assurance Wireless’s designated ETC area to include the updated service

¹ Virgin Mobile was designated as an ETC for the purpose of receiving both Lifeline and Link Up support in the federal Low Income Support program, which provides subsidy to monthly telephone service expense and the initial charges for commencing telephone service, respectively. In its 2012 Lifeline Reform Order, the Federal Communications Commission (FCC) eliminated Link Up support on non-Tribal lands for all ETCs. As a result, Virgin Mobile no longer receives Link Up support.

area included in Appendix 1 to Order 01, effective June 15, 2025 (hereinafter “2025 Designation Order”).

4. By this Petition, Assurance Wireless requests a further expansion of its designated ETC service area where it has wireless coverage to include additional areas in which United States Cellular Corporation (“UScellular”) had been designated as an eligible telecommunications carrier.² A listing of the additional wire centers in which the Company proposes to be designated as a Lifeline provider is listed in Exhibit A. This expansion will allow Assurance Wireless to provide Lifeline services to eligible low-income households anywhere it has wireless coverage in Washington. Consistent with its current Lifeline only ETC designation, the Company is not seeking designation in the expanded area to receive high-cost support from the Universal Service Fund. In addition, Assurance Wireless requests approval to serve tribal areas in wire centers that were previously approved for serving only the non-tribal areas of those wire centers, which are also listed in Exhibit A.

5. Assurance Wireless is a wholly owned subsidiary of T-Mobile USA, Inc. (“T-Mobile”). T-Mobile is the second largest wireless carrier in the United States, headquartered in Bellevue, Washington. T-Mobile acquired Assurance Wireless when it completed its acquisition of Sprint Corporation in 2020. The principal offices of Assurance Wireless are located in Bellevue, Washington. Assurance Wireless continues to possess the financial, managerial, and technical capability to provide Lifeline service in compliance with Section 54.201(h) of the FCC’s Rules.

² As discussed in T-Mobile’s May 28, 2025 letter filed in Docket No. UT-250179, this expansion is part of the transition of UScellular Lifeline customers to ensure that Assurance Wireless can serve as many Lifeline customers as possible following the acquisition of UScellular by T-Mobile US, Inc., which closed on August 1, 2025. *See* Notice of Closing of Transaction filed by UScellular, Docket No. UT-250179, Aug. 4, 2025.

6. Assurance Wireless has been designated as a wireless ETC in forty-seven states and the District of Columbia.³

7. As demonstrated herein, Assurance Wireless meets all applicable statutory and regulatory requirements for designation as an ETC in the proposed expansion of its designated service area.⁴ The Commission's grant of Assurance Wireless's Petition would advance the public interest by enabling the Company to expand the availability of Assurance Wireless Lifeline service to substantially more low-income consumers in Washington. Accordingly, Assurance Wireless respectfully requests that the Commission expeditiously approve this Petition.

II. DESIGNATED SERVICE AREA

8. WAC § 480-123-030(1)(a) requires Assurance Wireless to provide a description of the area or areas for which an ETC designation is sought. The Company seeks to expand its ETC service area so that it can offer Lifeline service throughout its coverage area. This area covers the service area of its affiliate, T-Mobile West LLC ("T-Mobile"), and has in part already been identified in the prior ETC Designation Orders. The list of previously approved wire centers in the Assurance Wireless designated ETC area is listed in Appendix 1 to the 2025 Designation Order.

III. ASSURANCE WIRELESS MEETS APPLICABLE REQUIREMENTS

9. The FCC's rules and WAC 480-123-030 set forth the information that must be contained in a Petition for ETC designation. In its filings in support of its initial ETC Designation petition filed in this Docket and subsequent expansion petitions incorporated herein by reference,⁵

³ Alabama, Arizona, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Kansas, Kentucky, Louisiana, Idaho, Illinois, Indiana, Iowa, Maine, Maryland, Massachusetts, Montana, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

⁴ The terms and conditions are available on Assurance's website: www.assurancewireless.com.

⁵ These filings include the June 5, 2025 Supplemental Filing in Docket UT-250220 and those in Docket UT-100203, such as the initial filing on behalf of Virgin Mobile USA, L.P. (Feb. 1, 2010), two supplements to this initial petition

Assurance Wireless provided all the information required by the Commission and the FCC's rules in effect at the time. The Commission has previously found that Assurance Wireless met the requirements for designation as an ETC. Assurance Wireless has complied with the conditions in the Commission's prior orders and will continue to do so. Assurance Wireless also complies with the service requirements applicable to the Lifeline support that it receives.

A. Assurance Wireless Will Provide All Required Services in The Expanded Designated Service Area

10. Assurance Wireless will provide all services required by Section 54.101(a) of the FCC's Rules throughout its expanded designated service area in Washington, including voice and broadband Internet access services. Assurance Wireless' Lifeline services will meet or exceed the minimum service standards. The Company's current base Lifeline offering for non-tribal areas is set forth in Exhibit B, which also includes the Company's newly proposed service offering for tribal areas.⁶

B. Assurance Wireless's Processes Comply with the Lifeline Verification and Enrollment Requirements, and the Company Remains Committed to Preventing Waste, Fraud and Abuse of the Lifeline Program

11. Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Assurance Wireless has processes in place to facilitate compliance with all federal customer enrollment requirements. Assurance Wireless has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with all FCC rules designed to achieve those objectives.

for limited designation as an ETC (respectively, Aug. 12, 2010 and Nov. 1, 2010), and an exhibit replacing Exhibit 2 of the initial petition (Nov. 9, 2010).

⁶ The terms and conditions are also available on Assurance's website – www.assurancewireless.com.

C. Assurance Wireless Requests Exemption from WAC 480-123-030 (1)(f)

12. Assurance Wireless requests that the Commission exempt it from the ETC petition requirements set forth in WAC 480-123-030 (f). Subsection (1)(f) requires wireless carriers to provide a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals. This requirement was adopted by the Commission in 2006 to make subsection (1)(f) more consistent with subsection (1)(d).⁷ Subsection (1)(d) reflects the federal requirement articulated by the FCC in 2005 that those carriers be able to demonstrate how “high-cost universal service support will be used to improve its coverage, service quality or capacity in every wire center for which it seeks designation and expects to receive universal service support,”⁸ which applies specifically to carriers intending to seek high-cost support to fund additional construction and development of their networks.

13. This is not relevant for Lifeline-only providers, which receive low-cost support based on customer subscription and usage, not construction benchmarks and coverage metrics.⁹ Such concerns are generally absent from the FCC’s rules for Lifeline-only carriers and, if anything, are contrary to the specific restriction in Section 54.416 (c) that additional standards imposed by the state on an ETC are permitted to the extent such standards “ensure compliance with *state* Lifeline programs” (emphasis added).¹⁰ Therefore, Assurance Wireless should be exempt from the requirement to file a coverage map showing current and projected cell sites.

⁷ *Amending WAC 480-120-399, and Adopting WAC 480-123- 020 through WAC 480-123-080, and WAC 480-123-999 Relating to Designation and Certification of Eligible Telecommunications Carriers*, Docket UT-053021, R-534 at 3 (WUTC Jun. 27, 2006).

⁸ *See Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6372-73, para. 2 (FCC 2005).

⁹ *See id.* at 6409, para. 86 (“accurate and legible maps will assist in the ETC designation process and ensure that high-cost support is targeted to the appropriate service areas”).

¹⁰ 47 CFR § 54.416 (c).

IV. EXPANSION OF ASSURANCE WIRELESS'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

14. In all prior Assurance Wireless ETC dockets, the Commission found that designation of Assurance Wireless as an ETC would serve the public interest. Similarly, expansion of Assurance Wireless's ETC service area will serve the public interest by providing a variety of benefits to Lifeline-eligible consumers including increased consumer choice, high-quality service offerings, and mobility. The designated ETC area expansion will increase the number of low-income households that can benefit from Assurance Wireless's high quality mobile voice, text, and data services. Indeed, its presence in the expanded designated area will increase competition within the Lifeline market, which this Commission and the FCC have previously indicated is in the public interest. For the foregoing reasons, grant of this Petition is in the public interest.

V. CONCLUSION

15. Based on the foregoing, Assurance Wireless respectfully requests that the Commission promptly grant this Petition and expand its Lifeline-only ETC service area as described in this Petition.

Respectfully submitted this 24th day of October, 2025.

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