

Debra McGulre Mercer
Tel 202.331.3194
Fax 202.261.0194
mercercdm@gtlaw.com

November 21, 2019

VIA ELECTRONIC FILING

Mr. Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: TracFone Wireless, Inc. – Notice of Change in Terms and Conditions of SafeLink
Wireless® Lifeline Service Offering; Docket Number UT-093012

Dear Mr. Johnson:

Pursuant to Paragraph 39 of the Commission’s Final Order designating TracFone Wireless, Inc. (“TracFone”) as an Eligible Telecommunications Carrier in Docket UT-093012, TracFone hereby provides notice to the Commission of a change in its terms and conditions of service offered to its SafeLink Wireless® Lifeline customers.

Commencing December 1, 2019, SafeLink Wireless® Lifeline service customers will receive the following monthly benefit plan at no charge: 350 airtime minutes, unlimited text messaging and 3 GB of mobile broadband data. Certain SafeLink Wireless® Lifeline customers who enrolled prior to December 1, 2019, currently receive 1,000 airtime minutes as part of their bundled voice and mobile broadband data service. Those customers will continue to receive 1,000 voice minutes and will also receive unlimited text messaging and 3 GB of mobile broadband data so long as they remain enrolled in the Lifeline program. If such customers are de-enrolled and then subsequently re-enroll in the SafeLink Wireless® Lifeline program they will receive the standard monthly Lifeline benefit plan of 350 airtime minutes, unlimited text messaging and 3 GB of mobile broadband data.

TracFone’s SafeLink Wireless® Lifeline benefit plan complies with Federal Communications Commission (“FCC”) Lifeline rules which require Lifeline service providers to meet the monthly minimum service standard for mobile broadband data service to receive federal Lifeline support in the amount of \$9.25 per month. *See* 47 C.F.R. § 54.403. Pursuant to 47 C.F.R. § 54.408(b)(2), the minimum service standard for mobile broadband data commencing December 1, 2019 is calculated using a mechanism set forth in the rules. Under that mechanism, the FCC calculated the minimum service standard for mobile broadband data to be 8.75 GB. However, the FCC released an Order on November 19, 2019, in which it “waive[d] the revised minimum standard to the extent it would require mobile carriers in the Lifeline program to offer more than 3 GB per month from December 1, 2019 through November 30, 2020.”¹ Therefore,

¹ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Order, FCC 19-116, ¶ 13 (Nov. 19, 2019).

Received
Records Management
11/21/19 15:49
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Mr. Mark Johnson
November 21, 2019
Page 2

starting December 1, 2019, the FCC's minimum service standard for mobile broadband data is 3 GB.

If you have any questions, please contact Stephen Athanson, Senior Attorney – Regulatory for TracFone, at (305) 715-3613 or sathanson@tracfone.com or undersigned counsel for TracFone.

Sincerely,


Debra McGuire Mercer

cc via email: Stephen Athanson