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June 10, 2011

Washington Utilities & Transportation Commission  
Attn: Records Center  
1300 S. Evergreen Park Drive, SW  
Olympia, WA 98504-7250

RE: **Virgin Mobile Compliance Filing in Docket UT-100203**

Dear Records Center:

On November 10, 2010 the Washington Utilities and Transportation Commission ("Commission") entered its Order 01, Order Granting Virgin Mobile USA L.P. ("Virgin Mobile") the Exemption from Provisions of WAC 480-123-030(1)(d), Investment Plan, and Designation as an Eligible Telecommunications Carrier in Docket UT-100203. The Order requires the company to meet 21 conditions to be classified as an Eligible Telecommunications Carrier, and directs the company to submit compliance filings with regard to several of the conditions. On November 16, 2010 Virgin Mobile submitted a compliance filing pursuant to Washington State Condition #2 of Order 01 (Appendix B), providing 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. After Commission Staff reviewed these documents and discussed them with the Company's representatives, Virgin Mobile submitted revisions to the compliance filing on December 3 and December 10, 2010. Virgin Mobile indicated in its filing that it would modify its Lifeline Customer Enrollment Form to add the DSHS Client identifier, as suggested by Staff, by the end of the first quarter 2011.

Virgin Mobile submitted a draft of the modified Lifeline Customer Enrollment form to Staff on April 13, 2011. The draft form was approved on April 19, 2011. The modified Customer Enrollment Form, which includes a space to collect applicants' DSHS client identifier, was implemented in all channels as of June 7, 2011 and in certain channels prior to that date. Virgin Mobile delayed implementing the modified form while seeking access to the DSHS database. In December 2010, Virgin Mobile initiated contact with DSHS to request permission to the DSHS database in order to verify customer eligibility. In January 2011 documentation was submitted to gain access to the DSHS database. In April 2011 the Database Access Request form was resubmitted to DSHS. Virgin Mobile understands that permission to access the database is imminent.

Please do not hesitate to contact me with any questions or concerns that you may have regarding this compliance filing.

Very truly yours,

*/s/ Kristin L. Jacobson*

Kristin L. Jacobson

cc: Simon ffitich, Washington AG's Office  
Jing Liu, WUTC

Enclosure – Exhibit A