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November 1, 2019

**By ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **National Lifeline Association and Q Link Wireless LLC Joint Notice  
of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197  
and 10-90**

Dear Ms. Dortch:

On October 31, 2019, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP, and Bill Viney of BGR Group met on behalf of the National Lifeline Association (NaLA) and Q Link Wireless LLC (Q Link) with Nirali Patel, Wireline Advisor to Chairman Ajit Pai, to discuss the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study filed by CTIA, the National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc.<sup>1</sup> We urged the Commission to grant the Joint Petition to Pause Implementation for the reasons detailed in NaLA's recent *ex parte* letters and comments

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<sup>1</sup> See Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (Joint Petition to Pause Implementation).

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filed on the petition,<sup>2</sup> and Q Link's *ex parte* letter and comments filed on the petition.<sup>3</sup> Further, the Commission should grant the Joint Petition to Pause Implementation so that it can; (1) fully consider and act on the pending petitions for reconsideration of the 2016 Lifeline Modernization Order's adoption of minimum service standards (MSS) without proper consideration of access and affordability; and (2) study the Lifeline service offerings and other retail offerings in the wireless marketplace and issue the State of the Lifeline Marketplace Report.<sup>4</sup> Such considerations and deliberations would allow the Commission to effectively balance the goals of reasonable comparability and affordability set forth in the 2016 Lifeline Modernization Order.<sup>5</sup>

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<sup>2</sup> See National Lifeline Association Notice of Oral *Ex Parte* Presentations, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 10 (filed Oct. 30, 2019, and Aug. 29, 22 and 16, 2019); National Lifeline Association Comments on Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (filed July 31, 2019). NaLA and Q Link's October 30, 2019 *Ex Parte* Letter was distributed to Ms. Patel at the meeting and is included as **Exhibit A**. We also provided copies of NaLA's Mobile Broadband Retail Price Survey and Mobile Voice Retail Price Survey that had been included with NaLA's Comments on the Joint Petition to Pause Implementation, and are included here as **Exhibit B**.

<sup>3</sup> See Q Link Wireless LLC Notice of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Aug. 29 and 22, 2019); Q Link Wireless Comments on Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (filed July 31, 2019).

<sup>4</sup> See Joint Lifeline ETC Petitioners' Petition for Partial Reconsideration and Clarification, WC Docket No. 11-42 et al. (filed June 23, 2016); Petition for Reconsideration of TracFone Wireless, Inc., WC Docket No. 11-42 et al. (filed June 23, 2016); Petition for Reconsideration of CTIA, WC Docket No. 11-42 et al. (filed June 23, 2016).

<sup>5</sup> *Lifeline and Link Up Reform and Modernization*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶ 71 (2016) ("The minimum standards we establish will also account for the need for Lifeline service offerings to be affordable. As we noted, 'the Lifeline program is specifically targeted at affordability' and it is necessary to establish minimum service levels that are both affordable and reasonably comparable...The minimum standards that we establish strike a balance between the demands of affordability and reasonable comparability by providing consumers with services that allow them to experience many of the Internet's offerings, but not mandating the purchase of prohibitively expensive service offerings."). The formula for December 1, 2019 does not consider the demands of affordability and strike this balance, and the Commission must study the Lifeline marketplace before it can do so.

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However, to the extent Commission is considering partially granting the Joint Petition to Pause Implementation and increasing the mobile broadband MSS, the Commission should support three minimum service options as of December 1, 2019 to avoid imposing a price increase on existing Lifeline subscribers and to ensure the availability of affordable service offerings for all Lifeline-eligible consumers in all states:

Plan Type	Minimum Standard	Subsidy Support Amount
Broadband	3 GB	\$9.25
Broadband and Voice Bundle	2 GB + 1,000 minutes	\$9.25
Voice	1,000 minutes	\$7.25

Under a partial grant scenario, these three standards should remain effective until the Commission decides pending petitions for reconsideration and issues the State of the Lifeline Marketplace Report (which could be moved forward from June 2021).

As described by TracFone Wireless, Inc. (TracFone) in its recent *ex parte* letter, the 3 GB MSS for a reimbursement of \$9.25 per month is an increase in MSS that is consistent with past escalations (last December, the mobile broadband MSS was increased from 1 GB to 2 GB).<sup>6</sup> This proposal would allow ETCs to continue to provide affordable no-cost service in California and Tribal lands, but it is too costly to provide to consumers in states where substantial additional subsidies cannot be combined with the standard Lifeline subsidy of \$9.25 per month without raising prices and forcing a co-pay in these states.

To ensure that existing Lifeline subscribers and other Lifeline-eligible consumers outside of California and Tribal lands (i.e., in states where no substantial additional subsidies are available) have access to affordable Lifeline service options, the Commission also should approve a **minimum mobile voice and broadband bundle of 2 GB and 1,000 minutes** (3,000 units in total – the same as 3 GB) for \$9.25 per month. This voice and broadband bundle minimum would allow Lifeline ETCs to offer mobile services as the vast majority of all consumers (and an estimated 90 percent or more of Lifeline subscribers) purchase them – in a bundle of voice minutes and broadband gigabytes. This option also has the following benefits:

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<sup>6</sup> See TracFone Wireless, Inc. *Ex Parte* Presentation, WC Docket Nos. 11-42, 09-197, 10-90 at 2 (filed Oct. 30, 2019).

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- (a) it does not take any minutes away from the 42 percent of Lifeline subscribers currently receiving the voice minimum of 1,000 minutes and **gives them an additional 2 GB of broadband data**; and
- (b) it does not take any megabytes away from the 58 percent of Lifeline subscribers currently receiving the mobile broadband minimum of 2 GB and **gives them an additional 1,000 minutes of voice service**.

Support for Lifeline voice services remains essential to keep low-income consumers connected and to promote public safety. Therefore, it is important to include a standard that at least some service providers can proactively make available to new Lifeline subscribers, as well as existing ones. This minimum mobile voice and broadband bundle accomplishes that goal.

Finally, the Commission should continue to support traditional voice plans with 1,000 minutes, but if a 1,000 voice minute offering for \$9.25 per month includes 2 GB of data, then a 1,000 minute plan with no broadband data (or less than 2 GB) included should only receive the phased-down support of \$7.25 per month.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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*Counsel to the National Lifeline Association and  
Q Link Wireless LLC*

Enclosure

cc: Nirali Patel

# **EXHIBIT A**

**KELLEY DRYE & WARREN LLP**

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MUMBAI, INDIA

October 30, 2019

**By ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **National Lifeline Association and Q Link Wireless LLC Joint Written  
Ex Parte Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-  
90**

Dear Ms. Dortch:

The National Lifeline Association (NaLA) and Q Link Wireless LLC (Q Link) urge the Commission to grant the pending Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study filed by CTIA, the National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc.<sup>1</sup> for the reasons detailed in NaLA's recent *ex parte* letters and comments filed on the Joint Petition,<sup>2</sup> and Q Link's *ex parte* letter and comments filed on the Joint Petition.<sup>3</sup> Further, the Commission should grant the Joint

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<sup>1</sup> See Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (Joint Petition to Pause Implementation).

<sup>2</sup> See National Lifeline Association Notice of Oral *Ex Parte* Presentations, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 10 (filed Aug. 29, 22 and 16, 2019); National Lifeline Association Comments on Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (filed July 31, 2019).

<sup>3</sup> See Q Link Wireless LLC Notice of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Aug. 29 and 22, 2019); Q Link Wireless Comments on Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (filed July 31, 2019).

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Petition to Pause Implementation so that it can fully consider and act on the pending petitions for reconsideration of the 2016 Lifeline Modernization Order's adoption of minimum service standards without proper consideration of access and affordability and issue the State of the Lifeline Marketplace Report.<sup>4</sup>

However, to the extent Commission is considering granting the Joint Petition to Pause Implementation and increasing the mobile broadband minimum service standard to, for example, 3 GB per month, it should also consider an alternative minimum that will benefit Lifeline consumers outside of California and Tribal lands (i.e., in states where no additional subsidies are available). For the reasons described in the enclosed Q Link document, the Commission should also approve a mobile broadband bundle minimum of 2 GB and 1,000 minutes (3,000 units in total – the same as 3 GB) for \$9.25 per month to remain effective until the Commission decides pending petitions for reconsideration and issues the State of the Lifeline Marketplace Report.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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*Counsel to the National Lifeline Association and  
Q Link Wireless LLC*

Enclosure

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<sup>4</sup> See Joint Lifeline ETC Petitioners' Petition for Partial Reconsideration and Clarification, WC Docket No. 11-42 et al. (filed June 23, 2016); Petition for Reconsideration of TracFone Wireless, Inc., WC Docket No. 11-42 et al. (filed June 23, 2016); Petition for Reconsideration of CTIA, WC Docket No. 11-42 et al. (filed June 23, 2016).

## The FCC Must Prioritize Access and Affordability for Consumers in All States When Considering Revisions to Mobile Broadband Minimum Service Standards and Public Safety Considerations Command Retention of Voice Support

- The FCC should grant the Joint Petition filed by CTIA and the public interest groups to pause the **minimum service standards** and **voice support phase-out** until it can study the impact of such changes on access to and affordability of Lifeline services as part of preparing the State of the Lifeline Marketplace Report
  - The December 1, 2019 formula will reduce the reimbursement for 1,000 minutes of voice to \$7.25 and increase the broadband data minimum to 8.75 GB
  - If not waived, these two rule changes will undermine the program's goals of **access** (by making Lifeline service less available and by phasing out support for voice) and **affordability** (by effectively imposing a \$30 price increase on mobile broadband Lifeline service)
- Granting a waiver and increasing the mobile broadband minimum service standard to, for example, 3 GB would allow ETCs to continue to provide affordable no-cost service in California and Tribal lands, but not in states where substantial additional subsidies are not available (it does not address the continued need for voice support)
- If the Commission were to approve 3 GB as the new mobile broadband minimum service standard, it should also approve a mobile broadband bundle minimum of **2 GB and 1,000 minutes** (3,000 units in total – the same as 3 GB) for \$9.25/mo. to remain effective until the Commission decides pending Petitions for Reconsideration and issues the State of the Lifeline Marketplace Report
  - Gives the 58% of Lifeline subscribers currently receiving the mobile broadband minimum of 2 GB an additional 1,000 minutes
  - **Gives the 42% of Lifeline subscribers currently receiving the voice minimum of 1,000 minutes an additional 2 GB of broadband data** (a 3 GB minimum does not help these consumers)
  - Provides low-income consumers with a robust bundle of voice and broadband services, which is how the vast majority of Americans purchase communications services
  - Makes service in the states where substantial additional subsidies cannot be combined with the standard Lifeline subsidy of \$9.25 more accessible and affordable than would a 3 GB mobile broadband minimum
    - The Lifeline minimum service standards have been a major cause of reduced participation by carriers and consumers in the Lifeline program

- The Lifeline program has declined from 12.7 million subscribers in 2016 to 7.5 million, a decline of 5.2 million subscribers (or 41%), including the following state examples:

State	% Decline Since 2016	Q Link % of Subscribers
Mississippi	<b>66.4</b>	N/A
Colorado	<b>43.9</b>	57
West Virginia	<b>38.9</b>	47
Kansas	<b>34.2</b>	50

- The Commission is required to consider public safety by its enabling act (*Mozilla v. FCC*) and **phasing out support for voice services endangers public safety**; there is no support for the voice phase-out in the record



# **EXHIBIT B**

## Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Affinity Cellular	\$35 for <u>5 GB</u>	Unlimited	Overage charge of \$.03 per MB
	\$50 for <u>10 GB</u>	Unlimited	
Air Voice Wireless	\$30 for <u>6 GB</u>	Unlimited	First 3 GB are high speed, subsequent 3 GB are reduced speed
	\$50 for <u>unlimited</u>	Unlimited	First 5 GB are high speed, subsequent data usage is at reduced speed
Boom! Mobile	\$49.99 for <u>10 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$69.99 for <u>20 GB</u>	Unlimited	
	\$39.99 for <u>5 GB</u>	Unlimited	
Boost Mobile	\$50 for <u>unlimited data</u> and a 12 GB hotspot	Unlimited	If congested, customers who use more than 35 GB of data in a billing cycle will be de-prioritized
	\$35 for <u>3 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G. Option of adding more data: 1 GB for \$5/mo or 3 GB for \$10/mo
Consumer Cellular	\$30 for <u>10 GB</u> (but must purchase at least 250 minutes for \$15 as well)	≥ 250 (text unlimited)	Once monthly data allowance is reached, the plan will automatically upgrade to the <u>20 GB</u> plan for \$40. If a customer exceeds that 20 GB limit, they will be charged \$5 for each extra GB
Credo	\$65 for <u>20 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$60 for <u>6 GB</u>	Unlimited	
Cricket	\$55 for <u>unlimited data</u> (\$50 with auto pay)	Unlimited	During congestion, customers who have used more than 22 GB in that month may experience slower speeds
	\$40 for <u>5 GB</u> (\$35 with auto pay)	Unlimited	Speeds reduced to 128 Kbps max after exceeding monthly allowance
	\$35 for <u>10 GB</u> on "Data Only" plan	No cellular network voice support	Plan not compatible with voice-and-data rate plans or voice-and-data extras

Plans do not include a free handset.  
Current as of July 19, 2019

## Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Eco Mobile	\$60 for <u>8 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$50 for <u>6 GB</u>	Unlimited	
	\$40 for <u>4 GB</u>	Unlimited	
Good 2 Go Mobile	\$40 for <u>10 GB</u>	Unlimited	Speed reduces after high-speed data allowance to maximum of 128 kbps.
	\$30 for <u>5 GB</u>	Unlimited	
GoSmart	\$45 for <u>20 GB</u> of 3G	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$30 with auto pay, requires credit or debit card) of 3G	Unlimited	
H2O	\$60 for <u>10 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Jolt Mobile	\$40 for <u>4 GB</u>	Unlimited	Speed reduced for exceeding data allotment
	\$55 for <u>5 GB</u>	Unlimited	
Kroger Wireless	\$45 for <u>20 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced to 64 kbps
	\$35 for <u>5 GB</u>	Unlimited	
Metro PCS	\$40 for <u>10 GB</u>	Unlimited	If congested, customers who use more than 35 GB of data in a billing cycle will be de-prioritized
Mint Mobile	\$25 for <u>12 GB</u> (12 month plan, must pay \$300 up front)	Unlimited	Once monthly data allowance is reached, speeds reduced.
	\$20 for <u>8 GB</u> (12 month plan, must pay \$240 up front)	Unlimited	
	\$25 for <u>12 GB</u> (3 month intro offer, must pay \$75 up front, can keep this price if prepay for 12 months; regular price is \$45/mo)	Unlimited	
	\$20 for <u>8 GB</u> (3 month intro offer, must pay \$50 up front, can keep this price if renew for 12 months; regular price is \$35/mo)	Unlimited	

Plans do not include a free handset.

Current as of July 19, 2019

## Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Net10	\$50 for <u>10 GB</u> (\$45 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$40 for <u>8 GB</u> (\$36 with auto pay, requires credit card)	Unlimited	
Page Plus Cellular	\$55 for <u>unlimited data</u> (\$50 with auto pay, requires credit or debit card)	Unlimited	At 60 GB, the company reserves the right to review accounts for usage violations
	\$39.95 for <u>8 GB</u> (\$36 with auto pay, requires credit or debit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
PureTalk	\$45 for <u>10 GB</u>	Unlimited	If users exceed data allotment, their speed will be reduced to 128 kbps (no overage fees)
Ready Mobile	\$90 for <u>10 GB</u>	Unlimited	Overage charge of \$.015/mb
	\$50 for <u>4 GB</u>	Unlimited	
	\$40 for <u>2 GB</u>	Unlimited	
Red Pocket Mobile	\$45 for <u>10 GB</u> (\$40 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$30 with auto pay, requires credit card)	Unlimited	
	\$65 for <u>20 GB</u> (\$60 with auto pay, requires credit card)	Unlimited	
Republic Wireless	\$25 for <u>2 GB</u> on monthly plan (\$250 for <u>2 GB</u> on yearly plan, \$20.83/mo)	Unlimited	Additional 1 GB of data per month for \$5, up to 15 GB

## Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Simple Mobile	\$40 for <u>15 GB</u> until 09/30/19, \$40 for <u>10 GB</u> after that date (\$37.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Straight Talk	\$45 for <u>25 GB</u> for 1 month plan (\$44 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$495 for <u>25 GB</u> /mo for 1 year (\$41.25/mo)	Unlimited	
Telcel	\$55 for <u>10 GB</u> (\$49.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Total Wireless	\$50 for <u>25 GB</u> (\$47.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$33.20 with auto pay, requires credit card)	Unlimited	
TracFone Wireless	\$30 for <u>3 GB</u>	Unlimited	"Data and text-only cards do not have service days and do not triple."
Ultra Mobile	\$29 for 5 GB (if purchasing 3 month	Unlimited	Once monthly data allowance is reached, speeds are

Plans do not include a free handset.

Current as of July 19, 2019

## Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
	plan, \$29 for 6 GB)		reduced to 128 kbps (or lower for heavy data users)
	\$49 for <u>50 GB</u>	Unlimited	
Virgin Mobile	\$45 for <u>10 GB</u>	Unlimited	Unlimited voice and data are on-network only. Once monthly data allowance is reached, speeds reduced to 2G
Walmart Family Mobile	\$39.88 for <u>14 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$29.88 for <u>4 GB</u>	Unlimited	
Wing	\$34 for <u>3 GB</u>	Unlimited	Once monthly data allowance is reached, CDMA customers will see their speeds reduced to 2G and GSM customers will not be able to use any data
Zing PCS	\$69 for <u>8 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$50 for <u>5 GB</u>	Unlimited	

## Mobile Voice Retail Price Survey

Plan	Minutes	Cost / month	Data	Conditions
Affinity Cellular	1500	\$20	1 GB	
AT&T	Unlimited	\$30 (\$25 with auto pay, credit, debit, or echeck required)	0	
Boom Mobile	1000	\$19.99	250 MB	
Boost Mobile	Unlimited	\$35	3 GB	
Consumer Cellular	Unlimited	\$20	0	
Credo	Unlimited	\$30	1 GB	
Cricket	Unlimited	\$25	0	
ECO Mobile	1000	\$50 (5 cents per minute)	0	All refills expire in 30 days; remaining balance recycled if account is refilled within 30 days
ECO Mobile	Unlimited	\$20	100 MB	Available for GSM and Sprint only
Good2Go	Unlimited	\$20 (\$15 with auto pay, credit or debit card required)	0	
GoSmart	Unlimited	\$15	250 MB	
h2o	Unlimited	\$20	500 MB	
Jolt Mobile	Unlimited	\$25	2 GB	
Jolt Mobile	1000	\$60 (6 cents per minute)	120 MB	
MetroPCS	Unlimited	\$30	2 GB	
Mint Mobile	Unlimited	\$15 intro plan (regular price is \$25)	3 GB	Minimum plan length is for 3 months, must pay full length up front
Net10	1000 (1250 with auto pay, credit card required)	\$25	0	No carry over benefit
Net10	Unlimited	\$20	1 GB	Once monthly data allowance is met, speeds reduced to 2G
PureTalk	Unlimited	\$20	500 MB	Once monthly data allowance is met, speeds reduced to 128 kbps

Plans do not include a free handset.  
Current as of July 19, 2019

## Mobile Voice Retail Price Survey

Plan	Minutes	Cost / month	Data	Conditions
Ready Mobile	Unlimited	\$30	1 GB	Has fair use policy: 5000 Voice, 5000 Text. Overage rate is \$.015/min, \$.002/text, and \$.015/MB
Red Pocket Mobile	1000	\$15	1 GB	
Republic Wireless	Unlimited	\$15	0	
Simple Mobile	Unlimited	\$25	1 GB	Once monthly data allowance is met, speeds reduced to 2G
StraightTalk	Unlimited	\$35	3 GB	Once monthly data allowance is met, speeds reduced to 2G
Telcel	Unlimited	\$25	0	
Ting	1000	\$24	0	No text included
T-Mobile Pay As You Go	1000	\$100 (10 cents per minute)	0	Service available for 30 days after activation/refill/conversion; then account is suspended.
T-Mobile Simply Prepaid	Unlimited	\$40	10 GB	
TracFone	1000	\$159.99 (365 service days)	0	
Ultra Mobile	Unlimited	\$19	1 GB	
Virgin Mobile	Unlimited	\$35	5 GB	Once monthly data allowance is met, speeds reduced to 2G
Walmart Family Mobile	Unlimited	\$24.88	2 GB	Once monthly data allowance is met, speeds reduced to 2G.
Wing	Unlimited	\$12 (flip phone plan)	128 MB	Data is 3G only; available only for 3G CDMA phones
Zing Wireless	Unlimited	\$30	0	

Plans do not include a free handset.  
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