

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Consumer Information and Disclosure)	CG Docket No. 09-158
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170
)	
IP-Enabled Services)	WC Docket No. 04-36

COMMENTS OF CTIA-THE WIRELESS ASSOCIATION®

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COMMENTS OF CTIA-THE WIRELESS ASSOCIATION®

CTIA-The Wireless Association® (“CTIA”)¹ submits these comments in response to the Commission’s Notice of Inquiry regarding consumer information and disclosures in billing and other aspects of the carrier-customer relationship.²

INTRODUCTION AND SUMMARY

Competition in today’s wireless market is more vibrant and varied than ever. The success of the mobile wireless industry is evidenced by the innovation and investment that occur in the sector on a daily basis, and in the ongoing attention given to developing new products and services, enhancing network capabilities, and meeting consumer expectations in creative and effective ways. Perhaps the greatest illustration of that innovation is the evolution of the customer-carrier relationship over the last two years. From the pro-ration of early termination

¹ CTIA – The Wireless Association® is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the organization covers Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, Advanced Wireless Service, 700 MHz, broadband PCS, and ESMR, as well as providers and manufacturers of wireless data services and products.

² *Consumer Information and Disclosure; Truth-in-Billing and Billing Format; IP-Enabled Services*, Notice of Inquiry, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36, FCC 09-68 (rel. Aug. 28, 2009) (“*Notice of Inquiry*” or “*NOI*”).

fees (“ETFs”), to the ability to change contract terms without extending the contract or incurring a fee, to extended trial periods, each is unique to wireless. Additionally, driven by the intense amount of information that is available, from pre-paid, to post-paid, to family plans, calling circles, all-inclusive plans, subsidized phones, un-subsidized phones, unlocked phones, and more, carriers are constantly upgrading the information available and provided to consumers – through in-store information, advertising and online tools – in an effort to win, and keep, customers in this competitive industry. CTIA believes that the wireless industry is one of the country’s greatest examples of how to serve customers through differentiated offerings and approaches designed to meet individual consumers’ needs. Going forward, CTIA hopes that any Commission action in this area will facilitate, rather than limit, the amount of evolution that continues to take place in the wireless customer relationship.

In this competitive environment, carriers’ billing and other consumer practices must be responsive to consumers’ immediate needs. Just as competition has spurred greater network reliability, coverage, and capacity, so too has competition made carriers’ ability to address customer service matters a paramount focus of industry leaders large and small. Because of this inherent market competition and the long-track record the mobile wireless industry has in ensuring that consumers are well-informed of their options at all stages of the carrier-customer relationship, expansion of federal regulation of carriers’ billing practices is not necessary. To do so needlessly would disrupt the equilibrium that exists at present which has led to record high customer satisfaction levels³ as well as freeze in time the ability of wireless providers to innovate in service provision.

³ See *infra*, Part II.B. See, e.g., ACSI Quarterly Scores, Q1 2009 and Historical ACSI Scores, Wireless Telephone Service, available at http://www.theacsi.org/index.php?option=com_content&task=view&id=147&Itemid=155&i=Wireless+Telephone+Service (last visited Oct. 4, 2009) (finding a record high 69% of wireless users were satisfied with their wireless telephone service in the first quarter

Because increased government regulation will serve only to inhibit carrier flexibility to respond to market forces, the Commission should not expend its valuable time and resources on injecting uncertainty into an industry model that already naturally evolves and self-regulates and that enjoys high approval from the purchasing public. Moreover, standardized billing will tend to homogenize offerings, interfering with carriers' attempts to distinguish themselves – a hallmark of any robustly competitive system – by creating more innovative and diverse service and feature options. Increased regulation would simply be an expensively redundant and unnecessarily duplicative measure, as many of the practices the Commission would likely seek to introduce across multiple technology platforms are already undertaken by wireless providers themselves, either through their own service offerings, commitments to consumer best practices or through voluntary participation with clearly defined stringent industry-wide standards.

Wireless providers are constantly innovating to bring U.S. consumers more of the wireless services that they want. This is demonstrated in the proliferation of voice and data service plans (and non-plan, pre-paid options) that now abound within the mobile wireless ecosystem. Other examples – which are detailed below – include the evolution of early termination fees, the availability of comparative coverage maps, and the ability of consumers to change plans without contract extensions.

CTIA's nationally recognized Consumer Code is another evolving standard for the wireless industry to ensure consumers are informed about their wireless service options, fees, and choices. CTIA's Consumer Code, to which all of the wireless industry's leaders adhere, already addresses many of the issues raised in the *Notice of Inquiry*. The Code ensures that consumers have straightforward access to easily understandable information needed to choose a

of 2009).

provider, choose a service plan, or switch to another such provider or plan. Although the relationship between the customer and the many companies that contribute to their wireless experience has changed as wireless services have gotten more and more personal, CTIA's Consumer Code continues to ensure that wireless consumers first contact with the wireless ecosystem – when choosing a provider – is characterized as an informed decision.

Because of steps already taken by carriers responding to the expressed desires of customers, carrier bills are becoming easier to understand and contain all relevant information. Competitive pressures have led carriers to go to great lengths to ensure that billing is clear and non-misleading. Moreover, the wireless ecosystem provides consumers a myriad of options to obtain additional information, through third-party websites that allow for wireless plan and carrier comparisons.

It is critical to note in the context of considering a “Schumer Box” for broadband services that wireless broadband is substantially different than wired broadband, and because of this many issues militate against an apples-to-apples comparison between wired and wireless broadband products. Direct comparisons between the two regarding such factors as transmission speed are complicated because of the need to consider the unique attributes of mobility. Additionally, bundled service offerings, bringing consumers discounts for choosing to receive multiple services from one provider, including voice, SMS, MMS, and data services, have become extremely popular with consumers and will not fit squarely into a static comparison chart. As CTIA has stated before in the Commission's proceeding on a National Broadband Plan, it would be a mistake to attempt to shoehorn the modern, vibrant and technologically dynamic mobile wireless broadband ecosystem into wireline definitions crafted for a fixed world.⁴

⁴ See Comments of CTIA – The Wireless Association, National Broadband Plan Public Notice No. 1, GN Docket No. 09-51 (filed June 8, 2009).

Considering the substantial costs of regulation and the complex nature of the wireless broadband market the Commission should continue to trust (but verify) that competitive market forces will ensure that wireless consumers remain informed and continue to receive the benefits of constant wireless market investment and innovation. Consumer regulation of wireless has succeeded to this point. The flexibility and creativity with which wireless carriers collectively and individually can meet the needs of customers is unmatched by any source, including costly external governmental regulation.

I. U.S. WIRELESS PROVIDERS ARE CONSTANTLY INNOVATING TO MEET EVOLVING CUSTOMER DEMANDS FOR WIRELESS SERVICES AND TO CREATE NEW WIRELESS PRODUCTS, SERVICES, AND TECHNOLOGIES

The U.S. wireless industry constantly evolves customer offerings to ensure that consumers remain excited about and fully satisfied with their service. Enabled by the Commission’s practice of allowing “competitive market forces to govern rate and rate structures for wireless services,”⁵ wireless carriers have been free to develop and introduce a diverse array of rate options that constantly respond to consumers’ needs in light of the increase in the amount and way they use their wireless service.

The wireless voice subscriber, for example, has seen an evolution from the original pay-per-minute subscription of the mid-1990’s to today’s “bucket” plans and a host of new service offerings designed to meet U.S. consumers’ high level of demand for wireless. Creative pricing plans that have emerged include free nights and weekends, rollover minutes, free in-network calling, circle calling plans, unlimited use plans, and many others. Table 1 below illustrates the many different pricing plans that carriers have introduced over time in response to changes in consumer demand and competitive pressures – from, AT&T Wireless’s revolutionary

⁵ See *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers, Report and Order and Further Notice of Proposed Rulemaking*, 22 FCC Rcd. 15817, 15831 ¶ 35 (2007).

introduction in May 1998 of its Digital One Rate plan,⁶ which allowed customers to purchase a bucket of minutes to use on a nationwide basis for a single flat rate, without any roaming and long-distance charges,⁷ to the introduction in 2003 of new “family plans” that permitted subscribers to sign up for multiple lines, with all lines sharing the available minutes on the plan jointly,⁸ to the unlimited calling service plans designed to compete directly with wireline local telephone service.⁹ Carriers introduced these pricing approaches in order to attract and retain customers.

⁶ See *Twelfth CMRS Competition Report*, 23 FCC Rcd. at 2291-92.

⁷ See Press Release, AT&T Launches First National One-Rate Wireless Service Plan (May 7, 1998), available at <http://www.allbusiness.com/media-telecommunications/telecommunications/6876757-1.html> (last visited Oct. 9, 2009).

⁸ See *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, Tenth Report, 20 FCC Rcd. at 15908, 15946 (2005) (“*Tenth CMRS Competition Report*”) (citing Family Plans Reflect Slowing Cell Growth, Reuters, Mar. 27, 2005).

⁹ See *Twelfth CMRS Competition Report*, 23 FCC Rcd at 2342. Some plans offer subscribers the ability to make unlimited calls within a particular metropolitan area or region. Leap, under its “Cricket” brand, and MetroPCS offer such service plans on a pre-pay basis. *Id.*

Wireless Has Provided Plan & Pricing Innovation Over Time

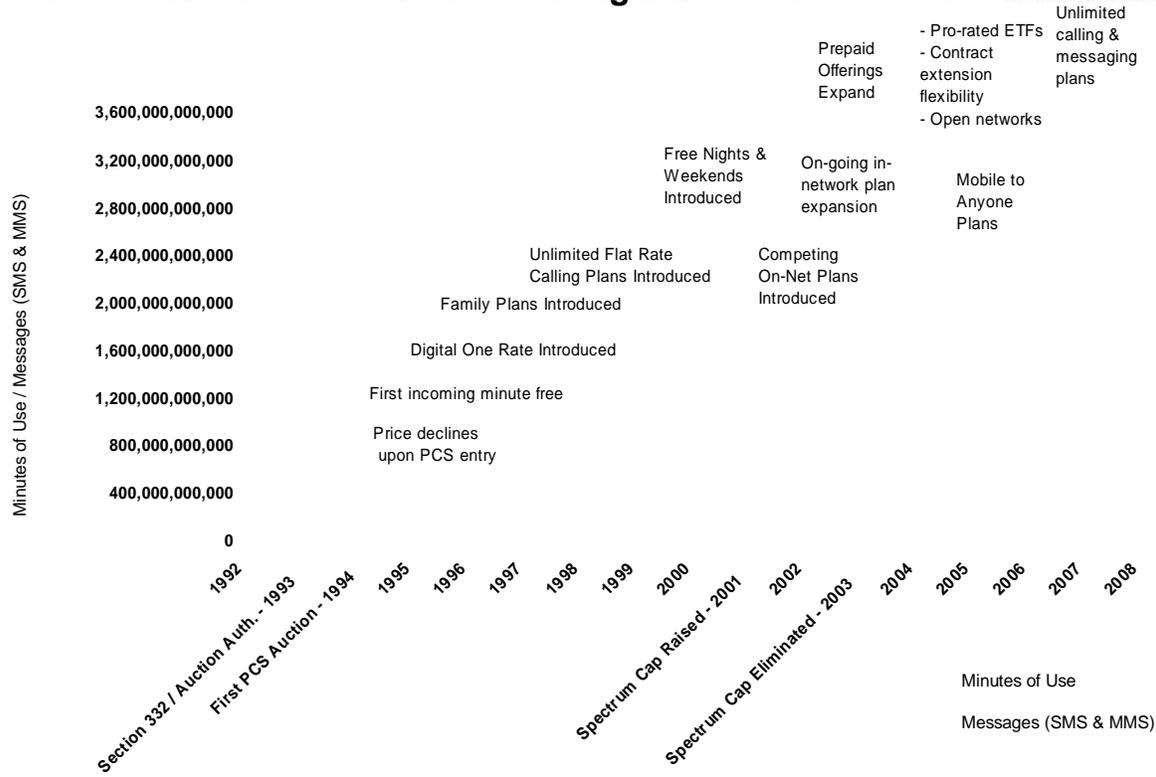


Table 1. A Timeline of Plan and Pricing Innovation (in Annual Terms)
Source: CTIA Research

This evolution in the voice market is constantly ongoing and has expanded through bundled service offerings to include wireless broadband data. Just in the last 1-1/2 years, new pricing options and service bundles have been made available to consumers to meet their growing demand for mobile wireless services. In February 2008, Verizon Wireless, followed by AT&T and T-Mobile, began offering an unlimited nationwide flat-rate calling plan for voice services.¹⁰ Later the same month, Sprint announced its “Simply Everything” plan that permitted

¹⁰ “Verizon Wireless Introduces New Unlimited Plans That Are As Worry Free As The Guarantee,” Verizon Wireless Press release (Feb. 19, 2008), available at <http://news.vzw.com/news/2008/02/pr2008-02-19.html>; see also *Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, Thirteenth Report, 24 FCC Rcd 6185, ¶ 112 (2009) (“*Thirteenth CMRS Competition Report*”).

unlimited voice and data use from phones operating over its CDMA and iDEN networks for \$99.99 per month.¹¹ In February 2009, Sprint introduced a variant of this plan that included 5 GB of Internet access from laptops for \$149.99 per month.¹² Later, Sprint announced a \$70 “Everything Data With Any Mobile, Anytime” Plan, which provides Sprint’s unlimited data service and unlimited mobile-to-mobile wireless calling.¹³ The evolution of service offerings is not limited to the post-paid market, pre-paid service providers are also responding to the needs of customers in both the voice and data markets. For example, Leap Wireless’s Cricket brand offers unlimited voice service for \$30 per month¹⁴ and unlimited broadband for \$40 per month.¹⁵

Unlimited data packages are an increasingly important component of the growing wireless industry. U.S. wireless data revenues rose 31% year-to-year to more than \$19.4 billion in the first half of this year, and they now account for more than one-quarter of carriers’ total revenues.¹⁶ Fifty percent of data users say that they prefer to have an unlimited data package, although only 14 percent of U.S. wireless subscribers had such a package in 2008.¹⁷ American use of text messaging has continued to grow steadily, as U.S. carriers delivered more than 740

¹¹ See Press Release, Sprint, Sprint Launches Revolutionary \$99.99 “Simply Everything(SM)” Plan (Feb. 28. 2008), *available at* http://newsreleases.sprint.com/phoenix.zhtml?c=127149&p=irolnewsArticle_newsroom&ID=1113525 (last visited Oct. 7, 2009).

¹² See Press Release, Sprint, Sprint Brings Even More Value to Customers with New Simply Everything Plan + Mobile Broadband (Feb. 16. 2009), *available at* http://newsreleases.sprint.com/phoenix.zhtml?c=127149&p=irol-newsArticle_newsroom&ID=1256741&highlight=Sprint%20Brings%20Even%20More%20Value%20to%20Customers%20with%20New%20Simply%20Everything%20Plan%20+%20Mobile%20Broadband (last visited Oct. 7, 2009).

¹³ See David Coursey, Sprint Launches \$70 Unlimited Calling Plan (Sept. 10, 2009), *available at* http://www.pcworld.com/businesscenter/article/171738/sprint_launches_70_unlimited_mobile_calling_plan.html (last visited Oct. 4, 2009).

¹⁴ See Wireless Cell Phone Plan, Cricket Wireless *available at* <http://www.mycricket.com/cricketplans/details/30plan> (last accessed Oct. 13, 2009).

¹⁵ See Cricket Broadband *available at* http://www.mycricket.com/cricketplans/details/broadband_rbt (last accessed Oct. 13, 2009).

¹⁶ Paul Kirby, *Wireless Data Revenue Jumps 31%, 25% of All Revenues Now Non-Voice*, TR DAILY, Oct. 7, 2009.

billion text messages during the first half of 2009 – nearly double the 385 billion carried during the first half of 2008.¹⁸ The typical U.S. mobile user now sends and receives more text messages than telephone calls.¹⁹ Notably, the vast majority of text messages sent by U.S. consumers are sent by consumers who purchase a text messaging plan. According to AT&T and Verizon Wireless, a mere 1% of text messages sent on their networks are sent a la carte.²⁰ Picture and MMS (multimedia service) messages are also becoming more popular; more than 10.3 billion were sent in the first half of this year, compared with 4.7 billion during the first six months of 2008.²¹ During the second quarter of 2008, a typical U.S. mobile subscriber placed or received 204 telephone calls per month.²² In comparison, the average mobile customer sent or received 357 text messages per month – a 450% increase over the number of text messages circulated monthly during the same period in 2006.²³ As shown in Table 2, Americans are tremendous mobile users – consuming trillions of MOUs and text messages and billions of MMS annually.

¹⁷ *Id.*

¹⁸ *See Kirby, supra* note 16.

¹⁹ *In U.S., SMS Text Messaging Tops Mobile Phone Calling*, NIELSEN WIRE, Sept. 22, 2008.

²⁰ *See* Testimony of Randal S. Milch, Executive Vice President and General Counsel, Verizon Communications *and* Testimony of Wayne Watts, Senior Executive Vice President and General Counsel, AT&T, Inc., Subcommittee on Antitrust, Competition Policy and Consumer Rights, Committee on the Judiciary, U.S. Senate, 111th Cong. (June 16, 2009).

²¹ *See Kirby, supra* note 16.

²² *Id.*

²³ *Id.*

Trillions of MOUs and Text Messages, and Billions of MMS

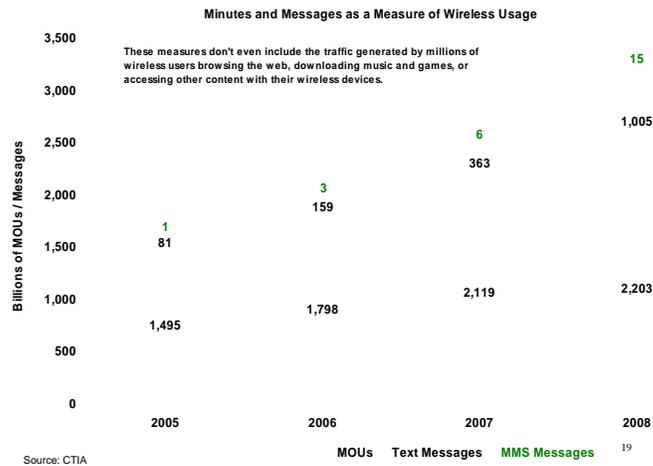


Table 2. Trillions of MOUs and Text Messages, and Billions of MMS Annually

Significantly, consumer demand and network investment show no signs of decreasing. In fact, the pace of deployment actually may increase as demand for connectivity continues to increase and carriers undertake significant network investments to deploy in the AWS and 700 MHz spectrum and upgrade their networks to 4G technologies.

II. THE WIRELESS CARRIER-CUSTOMER RELATIONSHIP IS ALSO CONSTANTLY EVOLVING TO MEET CONSUMER EXPECTATIONS AND REFLECT WIRELESS INNOVATION

Not only have the last several years witnessed an explosion in wireless service applications, pricing plans, and technologies, but competition has driven service providers to constantly innovate in their provision of service, the effect of which has been to increase the availability of wireless service plan options for consumers and to create better customer service, as reflected in independent surveys and fewer FCC complaints. One theme in the wireless carrier-customer relationship has been constant evolution to meet consumer concerns. Rather than statically waiting for costly and time-consuming governmental intervention, wireless service providers have dynamically met the challenges that have arisen with technological

developments, understanding and catering to the needs of their valued customers in the process. The result has been the most satisfied customers in the communications industry.

A. The Carrier-Customer Relationship Evolves With Consumer Demands.

The past decade ushered in a proliferation of new wireless services and, as described above, creative innovation in pricing plans and service bundles. These developments are the result of a competitive and innovative industry with service providers responding to consumer needs and wants in a variety of ways. In addition to pricing plans that gave customers the ability to better tailor their rate to the way they use the service, the mobile wireless ecosystem has also evolved in the amount of flexibility it permits consumers that wish to change service plans or carriers, and in the amount and nature of consumer information that is provided at the point of sale and throughout the life of the customer relationship.

While the details of these flexible practices and disclosures will be discussed below, what is notable is that U.S. wireless carriers are constantly adapting their consumer practices to the needs, demands and interests of their customer base. Rather than stubbornly adhering to policies that consumers dislike or market forces proven to be unpopular, wireless providers excel at monitoring and responding to changing preferences. The chart below, also attached at Attachment B, summarizes some of the changes the evolution of this relationship has produced in the last two years.

U.S. Wireless Carrier Consumer Practices

Wireless Carrier	ETF policies	Trial period	Point of sale informational documentation	Online, state-level coverage maps	Ability to change plan who contract extension	Ability to purchase services who a contract (postpaid)	Ability to bring your own phone	Ability to pay full prices for a handset and service who a contract	Military Personnel Benefits	
									Suspension	Termination
AT&T	Prorates new and renewed 1 & 2 year consumer contracts. Fees decline by \$5 each completed month of the contract ¹	30-day ²	Follows CTIA Consumer Code ³	Yes ⁴	Yes ⁵	Yes ⁶	Yes ⁷	Yes ⁸	Yes ⁹	No ETF ¹⁰
Sprint Nextel	Prorates new and renewed 1 & 2 year consumer contracts. Fees decline by \$10 per month, beginning with the 5th month of the contract until reaching \$50 for the remaining 5 months of the contract ¹¹	30-day ¹²	Follows CTIA Consumer Code ¹³	Yes ¹⁴	Yes ¹⁵	Yes ¹⁶	Yes ¹⁷	Yes ¹⁸	Yes ¹⁹	No ETF ²⁰
T-Mobile USA	Prorates new and renewed 1 and 2 year consumer contracts. \$100 with < 180 days left, \$50 with < 90 days left, and the lesser of \$50 or the customer's standard monthly charge with < 30 days left ¹	14-day (30 days in CA) ¹²	Follows CTIA Consumer Code ¹³	Yes ¹⁴	Yes ¹⁵	Yes ¹⁶	Yes ¹⁷	Yes ¹⁸	Yes ¹⁹	No ETF ²⁰
U.S. Cellular	Starting in the 3 rd month, the ETF will be reduced by \$7.50/month (24 month contract) or \$18.50/month (12 month contract) ¹¹	30-day ¹²	Follows CTIA Consumer Code ¹³	No, State-level only ¹⁴	Yes ¹⁵	Yes ¹⁶	Yes ¹⁷	Yes ¹⁸	Yes ¹⁹	No ETF
Verizon Wireless	Prorates new and renewed contracts. Fees decline by \$5 per month ¹⁰	30-day ¹¹	Follows CTIA Consumer Code ¹²	Yes ¹³	Yes ¹⁴	Yes ¹⁵	Yes ¹⁶	Yes ¹⁷	Yes ¹⁸	No ETF ¹⁹

Information Current as of June 3, 2009

Table 3. U.S. Wireless Consumer Carrier Practices. Source: CTIA Research

ETFs. An excellent example of this evolution is the change by carriers to the structure of ETFs. While such fees were originally imposed as flat amounts in recognition of the heavy discounts that customers receive and the loss to the company if service is terminated before that discount is recovered, ETFs proved to be a great source of concern in the market. In reaction, nearly all carriers have changed their practices. Since May of last year, AT&T has pro-rated new and renewed one and two year consumer contracts,²⁴ with fees declining by \$5 each completed

²⁴ See Press Release, AT&T, *AT&T Implements New Approach to Early-Termination Fees* (May 23, 2008), available at <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=25892> (last visited Oct. 2, 2009).

month of the contract instead of the previously applicable \$175 flat termination fee.²⁵ Verizon Wireless also reduces the ETF on new and renewed contract by \$5 per month.²⁶ Employing a slightly different approach, starting in the fifth month of the service agreement U.S. Cellular reduces the ETF by \$7.50/month for 24 month contracts or \$18.50/month for 12 month contracts.²⁷ T-Mobile applies a \$100 fee if termination occurs between 91 to 180 days before the term's end, a \$50 fee if termination occurs with 31 to 91 days of the term's end, and the lesser of \$50 or the customer's monthly recurring charges if termination occurs during the last 30 days of the contract.²⁸ Sprint's revised ETF policy decreases the ETF by \$10 for each month after the customer has been with Sprint for five months, until the ETF reaches \$50, where it remains for the length of the contract.²⁹

Coverage Maps. Similarly, carrier practices have evolved with regard to the availability of coverage data. Responding to customers' desire to learn about voice and data coverage as well as roaming, wireless companies (as required in the CTIA Consumer Code, discussed *infra* at Section III) have begun providing consumers with online coverage maps. T-Mobile USA, for instance, provides a zoomable map that allows potential subscribers to see street level coverage

²⁵ See Letter from Christopher Guttman-McCabe, Vice President, Regulatory Affairs, CTIA-The Wireless Association to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 09-51, *et al.*, at Attachment - *U.S. Wireless Carrier Consumer Practices* (filed Aug. 14, 2009) ("CTIA Letter - Aug. 14, 2009").

²⁶ See <http://news.vzw.com/news/2006/11/pr2006-11-16e.html>; see also <http://www.techdirt.com/articles/20061117/115842.shtml> (Last accessed May 29, 2009).

²⁷ See U.S. Cellular Customer Service Agreement, available at http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=legal_csa (last visited Oct. 6, 2009).

²⁸ See T-Mobile Terms & Conditions, available at http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true&WT.srch=2&Result_Inq=answer&InqSource=TMO (last visited Oct. 6, 2009).

²⁹ See http://nextelonline.nextel.com/en/services/termination_fee/early_termination_fee.shtml?id9=vanity:etf (last accessed June 3, 2009).

details for the areas in which they work, live, and travel.³⁰

Contract Changes. The ability of consumers to change plans without contract extensions has also changed in recent times. In the last two years, AT&T, Sprint, T-Mobile USA, U.S. Cellular and Verizon Wireless have all begun offering the ability for consumers to change plans without incurring a contract extension, giving consumers more flexibility within their wireless providers options to ensure their service plan meets their needs.³¹

Non-Contract Options. The last two years have additionally seen a rise in traditional wireless carriers providing customers with the ability to purchase service without a contract. Flexibly responding to some consumers' desire to obtain service without having to agree to a longer-term service contract, companies such as U.S. Cellular who have traditionally provided post-paid service now offer wireless service to consumers on their own terms, without contracts, credit checks, or monthly bills.³² Some companies, like Leap Wireless' Cricket brand, are entirely based on this business model. Similarly, all major wireless carriers now allow customers to bring their own technically-compatible phone for wireless service, as well offer consumers the choice to pay full price for a handset and obtain post-paid rate plans without a contract.³³ Taken in total, there are plans to meet the needs of wireless consumers from the most to the least prolific users of wireless services.

³⁰ See *T-Mobile Personal Coverage Check*, available at <http://www.t-mobile.com/coverage/pcc.aspx> (last visited Oct. 4, 2009).

³¹ See Attachment B.

³² See U.S. Cellular, *Prepaid Wireless*, available at http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=b_prepaid (last visited Oct. 2, 2009). T-Mobile's FlexPay option similarly allows consumers to forgo entering into a contract and obtaining a credit check, while retaining the ability to take advantage of most of T-Mobile rate plans. <http://www.t-mobile.com/shop/plans/Cell-Phone-Plans.aspx?catgroup=Flexpay-cell-phone-plan>.

³³ See CTIA Letter - Aug. 14, 2009, at Attachment: U.S. Wireless Carrier Consumer Practices.

Looking ahead, especially in light of the even greater increase in wireless penetration that will accompany upcoming Wi-Fi advancements and the Commission's development of a National Broadband Plan, it is critical that the industry retain the ability to quickly adapt to customer preferences and market demands as they emerge. Given the changes from just the last few years, it is evident that the constant progression of wireless service offerings necessitates a nimble, evolving, and innovative approach to consumer relations. The Commission should strive to preserve this ability for wireless carriers.

B. Customers Are Extremely Satisfied With Their Wireless Service.

Counter to the environment painted by the Commission in the NOI, the fact is that when measured by third parties, or when the FCC complaint data is reviewed, consumers are happier with their service and filing fewer complaints. That the wireless industry is successfully responding to what consumers want is confirmed by the numerous studies that demonstrate that subscribers are satisfied with their wireless service experience and believe it is constantly improving.

A January 2009 survey by Consumer Reports found that a clear majority of the nearly 52,000 surveyed said they were "completely or very satisfied with their service," and that this was "a substantial improvement over 2007."³⁴ The report found that "overall, cell-phone service has become significantly better...contract terms are less onerous, and there [a]re fewer problems with call quality."³⁵ The stark improvement in wireless customer satisfaction was largely a result of carriers' efforts to increase call quality and reduce connectivity issues, and their decisions to end the policy of extending contracts when subscribers make changes to their plans

³⁴ See Press Release, "Best Cell Phone Service," *available at* <http://www.consumerreports.org/cro/electronics-computers/phones-mobile-devices/phones/cell-phone-service-providers/cell-phone-service/overview/cell-phone-service-ov.htm> (last visited Oct. 4, 2009).

and pro-rate ETFs.³⁶ And this satisfaction has only increased since – the American Customer Satisfaction Index (“ACSI”) found that a record high 69% of wireless users were satisfied with their wireless telephone service in the first quarter of 2009.³⁷

Data from other third party groups also confirms that the majority of wireless consumers are satisfied with their service, and that satisfaction continues to increase. J.D. Power and Associates semi-annually rates wireless customer care, providing a score card based on how well wireless providers service their customers in three point-of-contact methods: telephone calls with a service representative and/or automated response system (“ARS”); visits to a retail wireless store; and on the Web. Their survey released in August 2009 found that “overall wireless customer care performance has improved considerably as customers report shorter hold times and improved rates of problem resolution on the first contact, compared with six months ago.”³⁸

Improving even from the February 2009 results, the most recent J.D. Power and Associates survey revealed that “satisfaction improves across all methods of contact, as a result of increased first-contact problem resolution and shorter wait times. More than three-fourths (76%) of calls to customer service are resolved on the first contact, compared with just 66 percent six months ago.”³⁹ In addition, hold times have decreased over a minute even since

³⁵ *Id.*

³⁶ *Id.*

³⁷ See ACSI Quarterly Scores, Q1 2009 and Historical ACSI Scores, Wireless Telephone Service, available at http://www.theacsi.org/index.php?option=com_content&task=view&id=147&Itemid=155&i=Wireless+Telephone+Service (last visited Oct. 4, 2009).

³⁸ See Press Release, “Increased First-Contact Problem Resolution and Shortened Hold Times Drive Improvements in Wireless Customer Care Performance” (Aug. 13, 2009), available at <http://www.jdpower.com/corporate/news/releases/pressrelease.aspx?ID=2009148> (last visited Oct. 4, 2009).

³⁹ *Id.*

February 2009.⁴⁰ A separate study by mywireless.org in 2009 found that an “overwhelming 83% [of respondents] agree that ‘companies competing for wireless customers give consumers enough choices so they can pick the wireless device, plan, options and content that best fits their needs.’”⁴¹

These surveys also demonstrate that different carriers have adopted different focuses for best serving their customers. Alltel was found to perform particularly well when contacts are resolved through customer visits to the retail store and ARS.⁴² T-Mobile’s strength was identified as prompt decisions to transfer customers from an automated response system to a live service representative.⁴³ Verizon Wireless was determined to perform well with regard to identifying customer problems quickly and resolving them efficiently with service representatives.⁴⁴ That three carriers scored highest based on differing but equally effective approaches to customer service elucidates the fact that flexible, innovative approaches to consumer relations on the part of wireless industry leaders have made tremendous strides in improving the overall wireless customer-carrier relationship.

The increasing effectiveness of the wireless industry in addressing customers’ issues is also demonstrated by the decrease in complaints received by the FCC. Counter to what the NOI details, complaints are actually down from the same period last year. As one measure, there were 2,822 fewer total wireless telecommunications complaints received by the Consumer and

⁴⁰ *Id.*

⁴¹ MyWireless.org 2009 Consumer Survey, “America’s Wireless Consumers are Overwhelmingly Satisfied with their Service - Remain Opposed to Higher Wireless Taxes, Adding New Regulations” (Apr. 3, 2009), at <http://www.mywireless.org/media/mywireless-2009-national-consumer-survey> (last visited Oct. 8, 2009).

⁴² *See* [http://www.jdpower.com/Telecom/ratings/Wireless-Customer-Care-Ratings-\(Volume-2\)](http://www.jdpower.com/Telecom/ratings/Wireless-Customer-Care-Ratings-(Volume-2)).

⁴³ *Id.*

⁴⁴ *Id.*

Governmental Affairs Bureau (“CGB”)⁴⁵ in the first quarter of 2009 (“Q1 2009”) (16,142 total) than there were in the first quarter of 2008 (“Q1 2008”) (18,964 total). The complaint statistics are even more favorable when Telephone Consumer Protection Act complaints, reported telemarketing violations which are largely beyond wireless carriers’ control but nonetheless comprised 73% of the complaints in the quarterly report released on September 8, 2009,⁴⁶ are omitted. Under that scenario, the total wireless complaints for the Q1 2008 and Q1 2009 were 6,125 and 4,299, respectively, a drop of nearly 30 percent. Moreover, in January of Q1 2009, the CGB received only 73 complaints relating to carrier marketing and advertising, 144 complaints relating to contracts/early termination, and 173 service related issues – far less than the results from one year earlier, in which there were complaints in the same categories registering at 216, 158, and 1,718, respectively.⁴⁷ The only category that saw a slight increase was complaints related to billing and rates, however, when rationalized against the number of wireless subscribers this area too is seeing a decrease in complaints. Given the 270 million wireless customers in the United States, these statistics show that only a tiny fraction of subscribers have complaints about their service. As the chart below shows, annually, only 40 billing and rate related complaints were received per one million subscribers to wireless – half the number of just four years earlier.

⁴⁵ See FCC Consumer & Governmental Affairs Bureau, *Quarterly Inquiries and Complaints Reports*, available at <http://www.fcc.gov/cgb/quarter/> (listing the informal consumer inquiries and complaints for each quarter from 2002 to the present).

⁴⁶ *Id.*

⁴⁷ *Id.*

Billing & Rates (Complaints per Million Subscribers) - Annual

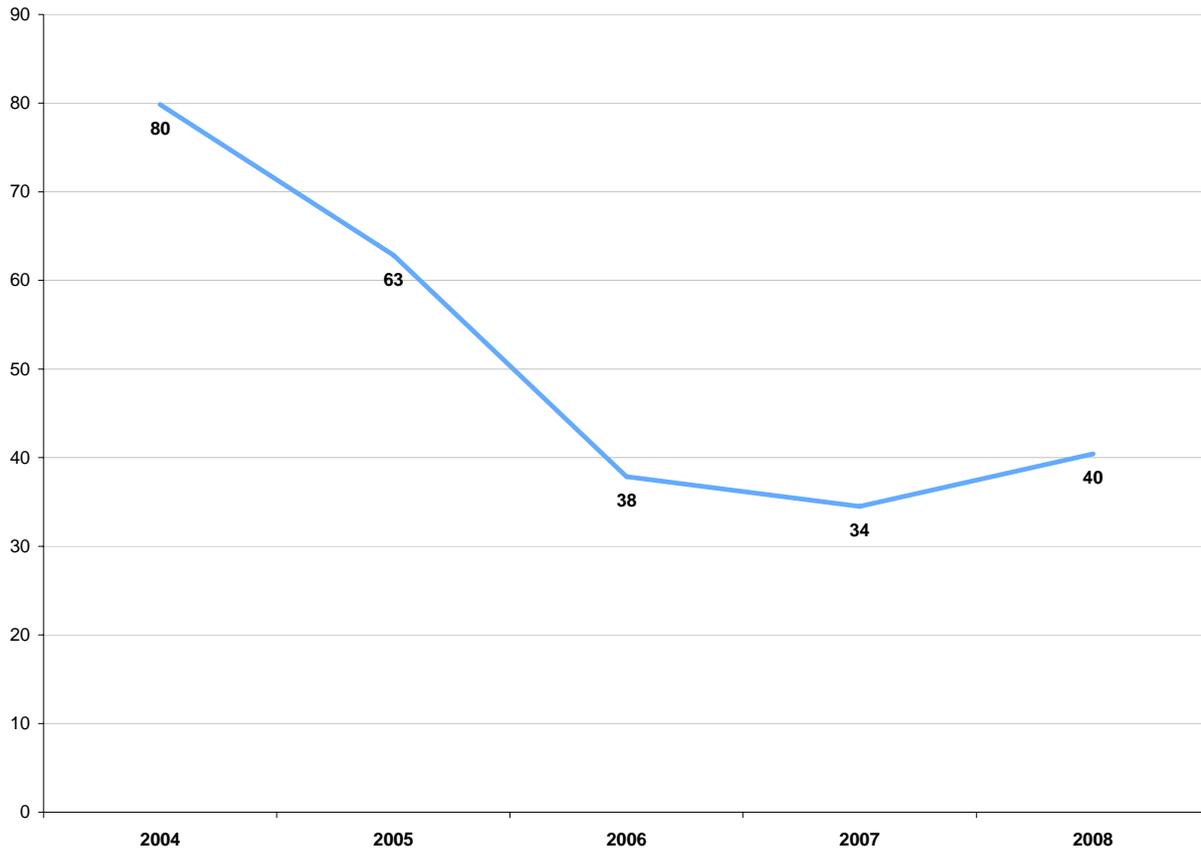


Table 4. Source: FCC Complaint Data 2004 – 2008; CTIA Research

In all, the modifications to the wireless carrier-consumer relationship in the last few years, as well as the marked improvements in customer satisfaction shown by various independent surveys, illustrate that the wireless industry itself is eminently capable of effectively responding to the needs and desires of its customer base. That consumers are increasingly satisfied with the flexibility they are being shown, the retail information with which they are being provided, and the manner in which their complaints are being addressed speaks to the fact that the cost and delay of external intervention is not necessary for the maintenance of a mutually beneficial and responsive carrier-customer relationship. Through attentive internal industry actions and reactions, carriers can most efficiently meet customers' evolving needs.

III. CTIA’S CONSUMER CODE IS AN EVOLVING STANDARD FOR THE WIRELESS INDUSTRY TO ENSURE CONSUMERS ARE INFORMED ABOUT THEIR WIRELESS SERVICE OPTIONS, FEES, AND CHOICES

The *Notice of Inquiry* seeks comment on how to provide consumers with better access to “clear, easily understandable information they need to choose a provider, to choose a service plan, manage use of the service plan, and decide whether and when to switch an existing provider or plan.”⁴⁸ In fact, consumers already have readily available, easily understandable access to all such information. CTIA’s members have strongly supported the Commission’s past efforts to increase the availability of consumer information and the wireless industry has taken far-reaching steps in this direction.

As the Commission is aware, in 2003, CTIA and its members developed and voluntarily adopted a “Consumer Code” to facilitate the provision of accurate and complete information to consumers by wireless service providers.⁴⁹ The CTIA Consumer Code⁵⁰ is now viewed as the industry standard for providing potential customers with information to help them make informed choices when selecting wireless service, and to ensure that consumers understand their wireless service and rate plans. The Consumer Code remains a zero-cost, highly effective method of creating stringent but evolving norms within the wireless industry that benefit consumers and avoid the delay and associated administrative costs of federal governmental intervention.

The Consumer Code sets forth ten principles, disclosures, and practices, to which wireless service provider signatories agree to voluntarily conform their business practices. Every

⁴⁸ *NOI* ¶ 16.

⁴⁹ *Id.* ¶ 11.

⁵⁰ *See* CTIA - Consumer Code for Wireless Services, Attached as Attachment C (“*Consumer Code*”).

wireless carrier that signs the voluntary Consumer Code is committing to all ten points. Only by adhering to all ten points is a company entitled to display the nationally-recognized Seal of Wireless Quality/Consumer Information in its advertising, store collateral, and publications.

The Consumer Code is widely supported and is self-regulated by the wireless industry. The nation's largest wireless carriers, including AT&T Mobility, Sprint Nextel, T-Mobile USA, Verizon Wireless, and U.S. Cellular are signatories, as are many smaller and rural carriers across the country, such as Bluegrass Cellular, Cincinnati Bell Wireless and SouthernLINC.⁵¹ Wireless carriers must annually re-certify that they are in compliance with the Code, and those not in full compliance are not permitted to display the Seal.

For the wireless industry, the Consumer Code answers many of the questions the Commission poses. For example, the *Notice of Inquiry* asks "how are consumers given information about their contractual commitments to service providers, and the trial periods and termination fees in those contracts?" The Consumer Code requires that for each rate plan offered to new consumers, wireless carriers must make available via disclosures at point of sale and on their websites detailed information about: (1) the calling area of the plan, (2) the access fee or base charge, (3) the charges for excess or additional minutes, (4) per-minute long distance and/or roaming charges, (5) any activation fees, and (6) any early termination fee that applies and the trial period during which no ETF will apply.⁵²

Similarly, the Commission's inquiry about "what information helps consumers assess the service quality being offered by each provider...includ[ing] coverage areas for wireless voice

⁵¹ See CTIA Consumer Code Participants, available at http://www.ctia.org/consumer_info/service/index.cfm/AID/10623 (last visited Oct. 2, 2009).

⁵² See CTIA Consumer Code, Section One.

and data services”⁵³ can be answered for the wireless industry by the Consumer Code. The Consumer Code requires signatories to make available maps depicting approximate voice service coverage applicable to each of their rate plans currently offered to consumers. The goal of such maps is to “enable consumers to make comparisons among carriers,” and make consumers aware of “any geographic limitations on the availability of any services included in the rate plan.”⁵⁴ As carriers increasingly deploy 3G and 4G networks capable of both voice and broadband data services, voice coverage and data coverage are rapidly becoming synonymous.

In evaluating what information consumers need when choosing a service plan or payment option, the Commission seeks comment on “whether advertised prices generally include all costs and fees.”⁵⁵ Again, the wireless industry has addressed this issue. The Consumer Code mandates that its carrier signatories must disclose material charges and conditions related to their advertised prices. To the extent the advertising medium reasonably allows, signatories must disclose in their advertising: (1) activation or initiation fees; (2) any required contract terms; (3) early termination fees; (4) the terms and conditions related to receiving a product or service for “free”; and (5) whether any additional taxes, fees, or surcharges apply.⁵⁶ Further, some carriers provide additional information at the point of sale showing what taxes and fees will apply in that customers’ jurisdiction. In addition, when a customer initiates service with a wireless carrier or agrees to a change in service under which the customer is bound to a contract extension, the

⁵³ See *NOI* ¶ 26.

⁵⁴ See *CTIA Consumer Code*, Section Two.

⁵⁵ See *NOI* ¶¶ 28-29.

⁵⁶ See *CTIA Consumer Code*, Section Five.

Consumer Code holds that the carrier will provide or confirm the material terms and conditions of service with the subscriber.⁵⁷

The Consumer Code also addresses the Commission’s concern about the adequacy of the information consumers currently receive on their bills, as well as any additional disclosures and “billing information to empower consumers to make better use of service plans.”⁵⁸ Many of CTIA’s members already are bound by the traditional Truth-in-Billing rules, and the Consumer Code additionally requires carriers to distinguish on customers’ bills the monthly charges for service, features, and charges retained by the carrier, from taxes, fees, and other charges collected by the carrier and remitted to federal, state, or local governments.⁵⁹ This provides more clarity to consumers and ensures that cost recovery fees or charges are not perceived to be taxes.

Wireless customers also are able effectively and in a timely manner to dispute charges on their bills with their service provider.⁶⁰ The Consumer Code states that customers must be provided online and on billing statements with a toll-free number to access a carrier’s customer service during normal business hours. Carriers must also provide information about how customers can contact the carrier in writing, by toll-free telephone, via the Internet, and other methods. This information must be included, at a minimum, on all billing statements, in written responses to customer inquiries, and on carriers’ web sites.⁶¹

The *Notice of Inquiry* seeks comment on whether the most effective way to ensure that consumers are protected is through voluntary industry codes, such as the CTIA Consumer

⁵⁷ See CTIA Consumer Code, Section Three.

⁵⁸ See *NOI* ¶ 35.

⁵⁹ See CTIA Consumer Code, Section Six.

⁶⁰ See *NOI* ¶ 50.

Code.⁶² As demonstrated above, the answer is yes. CTIA's Code "is designed to give consumers information, while still permitting the innovation that consumers have come to expect from wireless services."⁶³ In contrast, government regulators are not capable of being as flexible, immediately responsive, and cost-controlling as a self-regulatory Consumer Code recognized by industry leaders large and small. Although the Consumer Code is clearly defined and nationally recognized, it is dynamic and able to evolve with the times and technological advancements that affect consumers' information about wireless services, fees, and options. The Commission should continue to support codes such as CTIA's, conserving its resources and attention for issues that cannot be resolved by industry-wide standards.

IV. WIRELESS CONSUMERS HAVE EASY ACCESS TO INFORMATION ABOUT THEIR WIRELESS SERVICES

CTIA applauds the Commission's efforts to ensure that "customers are able to make intelligent and well-informed commercial decisions in an increasingly competitive marketplace."⁶⁴ CTIA and its members recognize that well-informed consumers are best positioned to benefit from a competitive marketplace and have made an enormous amount of information readily available through a multitude of sources, including in their stores, on their websites, in advertisements, and in customer bills. The Commission's suggestion that consumers may be unable to obtain easily comprehensible information they need to understand their bills,

⁶¹ See CTIA Consumer Code, Section Nine.

⁶² See *NOI* ¶ 37.

⁶³ See CTIA Consumer Code Main Page, available at http://www.ctia.org/consumer_info/service/index.cfm/AID/10352 (last visited Oct. 2, 2009).

⁶⁴ *NOI* ¶ 21; see also *Truth-in-Billing and Billing Format*, First Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 7492, ¶ 61 (1999).

evaluate their service plans and compare carriers⁶⁵ fails to recognize the impact of these information-outreach efforts.

In addition to detailed information related to billing and pricing options, carriers provide *focused* information on the aspects of their service that they believe corresponds to what customers are most interested in when determining how to purchase their services. Despite the fact that different carriers offer a variety of service features and plans, studies show that the vast majority of consumers focus on only a limited number of features – generally, price and coverage – when selecting a carrier and service plan. A 2008 mywireless.org survey found that 65% of respondents preferred “a wireless service contract with a lower price per month, a discount phone and an Early Termination Fee rather than a service contract with a higher price per month, no discount on a phone and no Early Termination Fee (20%).” Another 2008 survey, by comScore Wireless Report, found that price and coverage top consumers’ concerns when selecting a wireless carrier, with 22% of respondents reporting that “better coverage” topped their concerns, while 19% cited lower prices. The third most cited reason, with 17% of respondents, was that family/friends subscribe to the service.⁶⁶ As discussed in more detail below, price and coverage information is readily available from multiple sources. CTIA’s Consumer Code, for example, requires disclosure of more than 12 different pieces of information, not only at the point of sale but also on carriers’ web sites, making it far easier for customers to find the information they need to compare carriers than the Commission may acknowledge.

⁶⁵ *NOI* ¶ 23.

⁶⁶ Press Release, *comScore Wireless Report Finds Price Is an Increasingly Important Factor for Consumers Selecting a Cellular Phone Carrier*, comScore (Mar. 31, 2008), available at http://www.comscore.com/Press_Events/Press_Releases/2008/03/Price_Increasingly_Important_Factor_in_Cell_Phone_Carrier (last visited Oct. 8, 2009).

Wireless carriers ensure that their customers are fully informed not in response to regulation, but because they recognize that they must care for and respond to customers' needs in order to retain them in the competitive marketplace. More than 95.5% of Americans have a choice of three or more facilities-based wireless carriers, with each offering a different combination of services and features. In addition, 90.5% of Americans have a choice of four or more facilities-based wireless carriers, while 64.9% have a choice of five or more.⁶⁷ Pro-consumer policies such as number portability (wireless carriers have voluntarily adhered to a 2 ½ hour porting interval between wireless carriers),⁶⁸ pro-rated early termination fee policies, flexible rate packages, including contract and no-contract, and pre-paid and post-paid plans; and the ability to change plans without penalty, have all made it convenient for subscribers to easily switch providers. Accordingly, wireless carriers are constantly working harder to attract and retain subscribers and subscriber satisfaction in the form of understanding their service plans and charges is an important part of this goal.

A. Carrier Bills Are Designed To Be Easy To Understand And Contain All Relevant Information.

Given the competitive pressures that wireless carriers face to ensure customer satisfaction, it is not surprising that carriers have gone to great lengths to ensure that their customer bills are clear and non-misleading. Wireless carriers have gone above and beyond their pledge to abide by the Consumer Code and are continually striving to improve the readability of their bills and continue to make changes to improve the information provided to consumers.

Sprint Nextel, for example, has reconfigured its bills to provide for better readability by

⁶⁷ See, e.g., Comments of CTIA – The Wireless Association, WT Docket No. 09-66, at 3 (filed June 15, 2009).

⁶⁸ *Local Number Portability Porting Interval and Validation Requirements*, Report and Order and Further Notice of Proposed Rulemaking, 24 FCC Rcd 6084, ¶ 3 (2009).

increasing “white space, graphics throughout the bill, use of colored paper and much larger font size” and customizing bills to reflect “information on products and services that are relevant to each subscriber and their geographic locations.”⁶⁹ Sprint even provides subscribers an online “tour” of their bill to explain all notations and charges. T-Mobile offers customers the option of a “summary bill” which provides a simple, “quick and accurate overview” that provides a summary of service charges and the balance that is due.⁷⁰ Alternatively, subscribers can still choose a more detailed bill which “itemizes each call and all usage, service charges, taxes, and fees.”⁷¹ Verizon allows every subscriber to receive just one bill for all broadband, wireless and (if available) FiOS TV services.⁷² Further, all of the large carriers offer FAQ and “help” sections on their websites dedicated to addressing customer billing questions. And CTIA’s website provides an example bill that educates consumers about the charges that may appear on their wireless bills.⁷³

Wireless carriers also make billing and user information available online so that consumers have the convenience of checking their voice minutes, data and text usage from anywhere at anytime. As examples, AT&T, Verizon, and T-Mobile all offer consumers easy

⁶⁹ *Wireless Customers Now Have the Power of Simplicity*, BUSINESSWIRE, April 3, 2007; see also Sprint: Reading Your Bill, at http://www.nextel.com/en/support/billing/first_bill_consumer.shtml (last visited Oct. 8, 2009).

⁷⁰ See T-Mobile Billing Format FAQs, at <http://support.t-mobile.com/doc/tm23555.xml?docid=3211&referring%20topicid=37&A2L.SERVICE=&Referring%20TopicID/DocID%20List%20Index=y&navtypeid=2&pagetypeid=26&prevPageIndex=6>.

⁷¹ *Id.*

⁷² *Customers Will Win With New, Friendly Account-Management Features From Verizon Wireless*, Verizon News Release (Feb. 8, 2008) (announcing that customers can “receive just one bill for all multiple wireless and Verizon landline numbers across the country”); see also *Verizon Customers Can Now Sign Up for Verizon’s Integrated ONE-BILL Option and Make Payments at Verizon Wireless Stores*, Verizon News release (Aug. 13, 2007) (publicizing the availability of “ONE-BILL [which] combines the bill statements for Verizon calling, broadband and entertainment services, and Verizon Wireless service into one monthly statement” and offering consumers monthly savings for combining bills).

⁷³ CTIA Consumer Info, How To Read Your Wireless Bill, *available at*

ways to manage their accounts online by providing them the opportunity to pay bills, check minutes, change their rate plans and even add new services or lines.⁷⁴ Additionally, consumers have a variety of means to track charges they are incurring before a bill is issued including carrier short codes, web portals, call times/usage monitors on their wireless devices and others.⁷⁵ Carrier short codes allow a consumer to simply dial * or # plus a number in order to reach a certain service feature from the carrier. For example, subscribers to Sprint Nextel can dial *3 to pay their bill or *4 to check their minutes or account balance.⁷⁶ Each carrier offers subscribers an account management tool over its website to check minutes and usage in general.⁷⁷ Carriers like Verizon Wireless also offer account viewing tools on wireless devices.⁷⁸ A user can easily manage their account from their phone, including checking their minutes usage, text messages, and account balance.

The *NOI* asks whether consumers are confused about the labeling of fees and government-mandated charges on billing statements,⁷⁹ noting the Commission's tentative

http://www.ctia.org/consumer_info/wireless_bill/ (last visited Oct. 8, 2009).

⁷⁴ See AT&T Online Account Management, available at <https://www.wireless.att.com/olam/loginAction.olamexecute?target=BPS> (offering customers the option to check minutes and data usage, or upgrade to a new phone or change their rate plan); see also My Verizon: Manage Your Account, available at <http://www.verizonwireless.com/b2c/index.html?tab=myaccount&lid=//global//my+Verizon> (allowing subscribers view, print and pay bills, check balances, upgrade or activate phones and change plans at their My Verizon online account); see My T-Mobile, available at http://www.t-mobile.com/support/support-overview.aspx?WT.z_unav=mst_support (allowing subscribers to see and pay their bills, buy downloads and accessories, check minutes and text usage, “and much more”).

⁷⁵ See, e.g., Sprint Nextel Manage Your Account, available at http://www.sprint.com/assets/includes/widgets/en/customer_service_flyer_en.pdf (providing subscribers the simple *+one digit number they must press in order to manage different aspects of their account over the phone).

⁷⁶ *Id.*

⁷⁷ See *infra* at Sec. IV.B.

⁷⁸ See How to Use Guide: Accessing My Verizon Handset, at http://support.vzw.com/how_to_use/accessing_my_verizon.html (last visited Oct. 8, 2009).

⁷⁹ See *NOI* ¶ 38.

conclusion in the *Second FNPRM* on Truth-in-Billing that requiring carriers to separate government-mandated charges from all other charges satisfies the Commission’s policy goals of ensuring that carriers’ descriptions of billed charges are “brief, clear, non-misleading, and in plain language.”⁸⁰ CTIA supports the Commission’s efforts to require the straightforward disclosure of government-mandated and non-mandated charges on customers’ bills. Such disclosures benefit consumers by ensuring that they understand the fees their government assesses, and that they can accurately compare fees carriers may voluntarily impose. Additionally, these disclosures promote an open and balanced playing field for CMRS carriers, which are best-positioned to compete on price when all bills clearly describe charges and fees.

As discussed above, the CTIA Consumer Code already requires carriers to separate taxes and other government-mandated charges that are collected from customers and remitted to the government from charges that are not remitted to the government. The Code requires carriers to distinguish “fees and other charges collected by the carrier and remitted to federal state or local governments” from other service charges.⁸¹ Carriers also pledge not to label cost recovery fees or charges as taxes.⁸² Thus, the Code strikes an appropriate balance between providing carriers with necessary flexibility to structure their bills in a manner that meets their customer and business needs and ensuring that their billing statements are clear and non-misleading.

Consumer Disclosure – 911 Fees. In light of these efforts made by wireless carriers, CTIA believes that wireless consumers are generally not confused about the labeling of fees and government-mandated charges on their billing statements. In at least one instance, however,

⁸⁰ See NOI ¶ 10, n.23; *Truth-in-Billing Format*; *National Association of State Utility Consumer Advocates’ Petition for Declaratory Ruling Regarding Truth-in-Billing*, Second Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking, 20 FCC Rcd 6448, ¶ 52 (2005) (“*Second FNPRM*”).

⁸¹ CTIA Consumer Code, Section Six.

consumers may not be getting accurate information about where those government-mandated fees are spent – but not because wireless carriers are not labeling these fees properly. Rather, some state and local government entities that require carriers to collect fees ostensibly for the support of E911 are routinely diverting these fees to other government purposes wholly unrelated to E911.⁸³ This has become a widespread and costly practice that has undermined the intention of using E911 funds only to benefit the emergency-calling systems and it misleads consumers.

As states are dealing with budget shortfalls and deficits during difficult economic times, numerous states such as Oregon, Hawaii, and Delaware, have transferred millions of dollars from E911 funds to the state’s general funds.⁸⁴ In New Jersey, too, E911 funds are not being used in the manner in which they are supposed to be. In 2009, *none* of the estimated \$137 million collected from New Jersey cell phone users for the Garden State’s “9-1-1 System and Emergency Response” fee will go to local 911 call centers. The state will instead spend the money on several public safety initiatives, with the majority of the funds going towards State Police operations.⁸⁵

⁸² *Id.*

⁸³ *Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges*, FEDERAL COMMUNICATIONS COMMISSION, AT 10-12 (July 22, 2009) (The report found that 12 states used E911 fees for purposes other than E911 service, and of those, certain states used the funding for purposes completely unrelated to emergency response. For example, in 2008-2009, New York transferred \$10 million from the balance of the local wireless fund account to the state’s General Fund because it was facing a significant deficit.).

^{84/} *See, e.g.,* Donny Jackson, *CTIA, NENA Work to Halt 911 Fund Raids*, URGENT COMMUNICATIONS, May 28, 2009, at http://urgentcomm.com/policy_and_law/news/ctia-nea-halth-911-fund-20090528/ (last visited Oct. 8, 2009); Rosemarie Bernardo, *Funding Loss Slows 911 Upgrades*, HONOLULU STAR-BULLETIN, Aug. 10, 2009, at http://www.starbulletin.com/news/20090810_funding_loss_slows_911_upgrades.html (last visited Oct. 8, 2009).

^{85/} Daniel Walsh, *Watchdog Report: New Jersey Siphons Millions from 911 Call Centers*, Press of Atlantic City, Aug. 9, 2009, at http://www.pressofatlanticcity.com/news/breaking/article_90fcc378-849a-11de-a526-001cc4c03286.html (noting that New Jersey is one of a dozen states to report taking E911 funds and using the money for other purposes). Of the 12 states, New Jersey spent the most – more than \$100 million last year – on services other than 911. *Id.*

Other examples abound. In New York, only 19 cents of the \$1.20 the state collects monthly from each subscriber goes to emergency calling services. In Wisconsin, the state government decided to divert \$100 million in the next two years to local governments to reduce pressure to raise property taxes. In Arizona, lawmakers funneled \$25 million from the emergency telecommunications fund, halving its size, and cut its monthly 911 cell phone fee to 20 cents. As a result, the fund may be out of money within three years.⁸⁶

Thus, while wireless billing statements inform customers that a fee is being assessed for E911 purposes pursuant to government mandate, in fact the money often is not being used in this way. Actions by some state officials are thus rendering the explanation of the charges misleading to consumers at best, and patently incorrect at worst. Emergency call center services and “next generation” capabilities are supposed to be the priority for E911 fees. The Commission should work with Congress to adopt measures that guarantee the revenue collected at the state and local level from E911 fees is spent appropriately so as to ensure that customers are not misled about the fees’ purpose.

B. Consumers Have Access To Complete Information At Other Stages Of The Consumer-Carrier Relationship.

Consumers have access to full information about their carrier, service plan and options at all stages of their relationship with their carrier – when choosing a carrier and service plan, during the life of the contract, and when they seek to switch carriers or service plans. Indeed, more than half of the 10-point CTIA Consumer Code commits carriers to providing adequate information to consumers – whether they are choosing a carrier, switching carriers or in the

⁸⁶ Peter Svensson, *Cash-Strapped States Raid Cell Phone 911 Funds*, ASSOCIATED PRESS, July 23, 2009, at http://www.msnbc.msn.com/id/32109599/ns/technology_and_science-wireless/ (last visited Oct. 8, 2009) (noting that “Dispatchers say the diversion of money comes at the expense of improvements that would give crime and accident victims more opportunities to reach responders...In some states, the AP

middle of a contract term – in a variety of contexts, including in advertising materials, in stores, in contract materials, on websites, and on an ongoing basis on customer bills.⁸⁷

In Advertising Materials. As noted above, wireless carriers that are signatories to the Consumer Code have pledged to disclose all material charges and conditions related to the advertised prices of services, including if applicable, activation or initiation fees, monthly access fees or base charges, any required contract term, early termination fees, and related terms and conditions, as well as disclosures concerning special promotional plans, geographic scope and other related information. In addition, because carriers use advertising to distinguish their services from those of their competitors, they fully explain the differences in broadband services, rate plans, or geographic reach. For example, AT&T has successfully promoted its “Rollover” minute plans through popular television advertisements.⁸⁸ Similarly, Verizon launched an campaign in 2008 about its friends and family plan. These advertisements not only provide memorable slogans, *e.g.*, “Can you hear me now?,” but also provide consumers the first step in understanding the myriad of wireless service offers available.

In Stores. At carrier retail stores, consumers can perform personalized coverage checks (including the capability to “drill-down” to street level coverage data), and can evaluate and compare the myriad of pricing plans and handset options.⁸⁹ Store employees are trained to provide helpful and accurate information about the service plans available and the best service

analysis found, less than half that money is actually going to help emergency dispatches keep pace with the features of smart phones.”).

⁸⁷ It is important to note, however, that while CTIA supports the full disclosure of all fees and charges impose, disclosing the exact amount of each such charge is not possible at the point-of-sale. Carriers are subject to a broad array of state and local taxes, which vary by customer. Given these diverse and constantly changing fees, precise disclosures at the point of sale are simply impossible.

⁸⁸ Theresa Howard, *AT&T Ads Stick with Family in Love with Rollover Minutes*, USA TODAY (Mar. 29, 2009).

⁸⁹ *See, e.g.*, Attachment A, Materials Available at Sprint; Attachment A, Materials Available at T-Mobile.

plan for an individual's needs. Stores also carry explanatory materials that consumers can take with them in order to review information about a carrier's plans.⁹⁰ Further, unaffiliated stores also provide information about different carriers and their capabilities. For example, Best Buy's online "Mobile Phone Resource Center," provides content from CNET that educates consumers on all aspects of choosing wireless service and devices, down to the pros and cons of CDMA vs. GSM.⁹¹

In Their Contracts. Carriers strive to make consumers well aware when signing contracts for service of any important contract terms, including any early termination fees imposed in conjunction with their service and handset packages, and service capabilities and limitations. Each such term is fully disclosed in an easy to understand manner at the stores at the time of purchase⁹² or online during ordering.⁹³ For example, the "Customer Agreement" that is readily available on Verizon Wireless's website clearly and conspicuously discloses its policies about roaming fees, ETFs, and other service-related information.⁹⁴ The early termination fee policy is described in bold, capital letters on its website customer agreement."⁹⁵ The website

⁹⁰ See, e.g., Attachment A, Materials Available at Verizon; Attachment A, Materials Available at Cricket.

⁹¹ See Best Buy's Mobile Phone Resource Center Educates Consumers on Their Wireless Options Source: Best Buy, at http://bestbuy-cnet.com.com/4352-13749_7-6590054.html.

⁹² See Attachment A (examples of Metro DC area carriers materials which illustrate common point of sale disclosures).

⁹³ See, e.g., T-Mobile Return Policy, http://www.t-mobile.com/support/SupportSubContent.aspx?PAsset=Hme_Sup_QuestionMaster&WT.cg_s=%20support_billing; Sprint 30-Day Return Policy, at <http://www.sprint.com/landings/returns/> (last visited Oct. 2, 2009); AT&T Wireless Service Agreement, <http://www.wireless.att.com/learn/articles-resources/wireless-terms.jsp> (last visited Oct. 5, 2009); Alltel Billing Policy, at https://alltel.custhelp.com/cgi-bin/alltel.cfg/php/enduser/std_adp.php?p_faqid=8711 (last visited Oct. 7, 2009); Sprint Nextel Understanding Your Bill, at http://pcsinvoicetutorial.sprint.com/tour_1.html (last visited Oct. 7, 2009).

⁹⁴ See Customer Agreement, at http://www.verizonwireless.com/b2c/globalText?textName=CUSTOMER_AGREEMENT&jspName=footer/customerAgreement.jsp (last visited Oct. 2, 2009).

⁹⁵ See Verizon Customer Agreement, at <http://www.verizonwireless.com/b2c/>

also provides information about the obligations that the customer undertakes after signing the “Customer Agreement.”⁹⁶ All major wireless carriers similarly provide their customer agreements separately on their websites for consumers to access and review as well as at the time of purchase.

On Their Websites. Carrier have easily accessible and understandable information concerning service availability, contract terms, types of service contracts available, device availability, fees imposed, and special promotions. For example, Sprint Nextel’s website provides consumers immediate choices to review their “individual plans,” “Nextel Direct Connect” plans, “family plans,” “mobile broadband plans,” and “Any Mobile Anytime” plans.⁹⁷ Each plan description provides the user a detailed review of all of the service’s capabilities as well as the monthly cost.⁹⁸ Similarly, Bluegrass Wireless’ website provides consumers with information on their local and nationwide plans as well as pay-as-you-go options and plans for customers eligible for the Universal Service Fund’s low-income Lifeline and Linkup programs.⁹⁹ AT&T provides consumers information on device and package deals and lists the cost of the

globalText?textName=CUSTOMER_AGREEMENT&jspName=footer/customerAgreement.jsp (last visited Oct. 8, 2009).

⁹⁶ *Id.*

⁹⁷ See Sprint Nextel, at <http://www.sprint.com/index.html>.

⁹⁸ See Sprint Nextel Shop, at http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/SubmitRegionAction?isUpgradePathForCoverage=false&currZipCode=&upgradeOption=&nextPage=DisplayPlans&equipmentSKUurlPart=%3FcurrentPage%3DratePlanPage&filterStringParamName=filterString%3DIndividual_Plans_Filter&newZipCode=10028.

⁹⁹ See Bluegrass Cellular at <http://www.bluegrasscellular.com/plans> (last accessed Oct. 13, 2009).

device as well as the cost of each service option for easy review and comparison.¹⁰⁰ Most carriers also provide detailed coverage maps on their websites.¹⁰¹

Carriers also use their websites to keep subscribers informed about the features of their service plan, and to allow subscribers to change their service plan. AT&T offers consumers easy access via their online “myWireless” accounts to change their voice, picture/video messaging plans, text messaging plans, and data plans.¹⁰² AT&T even allows subscribers to roll over a month’s worth of minutes to a new plan and provides consumers 30 days to try it out.¹⁰³ Information about these options is easily accessible on AT&T’s website via the Wireless account tool, the “Explore” page, or even through a plain and simple search of the word “change.” Carriers also provide information about the best wireless plans suited for their particular needs.¹⁰⁴

Carriers also provide easy-to-understand information to consumers about how they can switch carriers and port numbers. For example, AT&T provides consumers a checklist to refer

¹⁰⁰ See AT&T Cell Phone Deals and Packages, at <http://www.wireless.att.com/cell-phone-service/packages/prepaid-packages.jsp>.

¹⁰¹ See generally AT&T Mobility Coverage Viewer, at <http://www.wireless.att.com/coverageviewer/> (last visited Oct. 8, 2009); AT&T - Cities Supporting AT&T 3G/Mobile Broadband, at http://www.wireless.att.com/coverageviewer/popUp_3g.jsp (last visited Oct. 8, 2009); Sprint Coverage, Tool, at <http://coverage.sprintpcs.com/IMPACT.jsp?PCode=vanity:coverage> (last visited Oct. 8 2009); T-Mobile USA Personal Coverage Check, at <http://www.t-mobile.com/coverage/pcc.aspx> (last visited Oct. 8, 2009); Verizon Wireless Coverage Locator, at <http://www.verizonwireless.com/b2c/CoverageLocatorController> (last accessed Sept. 24, 2009); Cincinnati Bell Wireless Coverage, at <http://www.cincinnati-bell.com/consumer/wireless/coverage/> (last visited Oct. 8, 2009); MetroPCS Wireless Coverage, at <http://www.metropcs.com/coverage/> (last visited Oct. 8, 2009).

¹⁰² See AT&T Answer Center, How can I change a feature?, at <http://www.wireless.att.com/answer-center/main.jsp?solutionId=53575&t=solutionTabHow can I change my MEdia Net plan?>

¹⁰³ Shopping Online—Top Questions and Answers, at <http://www.wireless.att.com/learn/basics/shopping-faqs.jsp#01> (last visited Oct. 5, 2009).

¹⁰⁴ See, e.g., AT&T, Shopping Online—Top Questions and Answers, at <http://www.wireless.att.com/learn/basics/shopping-faqs.jsp#01> (discussing and comparing the differences between rate plans and services and also providing customers information about how to switch between

to before they make a porting request.¹⁰⁵

Independent third parties also assist consumers in their choices. Multiple Web-based sources offer reviews and provide guidance on how to shop for a service provider and choose a mobile device. The site www.myrateplan.com, for example, allow users to enter in the types of wireless plans that they are interested in, as well as their location, and comparison shop among providers.¹⁰⁶ Other third parties, such as billshrink.com, provide consumers with tools to compare wireless service offerings.¹⁰⁷ Indeed, a recent ad campaign by T-Mobile highlighted the billshrink.com website nationally as a tool for consumers to compare wireless plans. Consumer blog postings and the media in general also contribute to the greater knowledge and understanding of wireless pricing plans and availability. With access to an unprecedented amount of information, consumers can make informed decisions as to the carrier that best meets their needs. In addition, J.D. Power and Associates conducts wireless user surveys that rate providers by customer satisfaction, call quality and customer service.¹⁰⁸ The Commission recently recognized that “numerous” third-party resources such as “publications [like] *Consumer Reports*, trade associations, marketing and consulting firms” are “dedicated to giving consumers an overview and comparison of the mobile telephone services available in their area.”¹⁰⁹

All of these efforts have resulted in well-informed and highly satisfied customers. In

plans) (last visited Oct. 8, 2009).

¹⁰⁵ Consumer Number Portability Checklist, at <http://www.wireless.att.com/learn/basics/transfer-number/porting-guide.jsp> (last visited Oct. 8, 2009).

¹⁰⁶ See [Myrateplan.com](http://www.myrateplan.com) (last visited Oct. 5, 2009).

¹⁰⁷ See <http://www.billshrink.com>; see also <http://www.wirelessguide.org/> (providing a cellphone and wireless buying guide) (last visited Oct. 5, 2009).

¹⁰⁸ J.D. Power, 2009 Wireless Call Quality Volume 2, at <http://www.jdpower.com/telecom/articles/2009-Wireless-Call-Quality-Volume-2> (last visited Oct. 4, 2009).

¹⁰⁹ *Thirteenth CMRS Competition Report* ¶ 177; see also *Cell phones: Our tests of 70 standard and smart models show they're sharing many more features*, CONSUMER REPORTS, Jan. 2009 (annual

fact, the Commission’s latest CMRS Competition Report recognized the industry’s efforts to provide detailed and clear information to consumers, finding that “[w]ireless consumers continue to demand information on the availability and quality of mobile telecommunications services” and that the “wireless industry . . . has responded to this demand by launching various initiatives designed to educate consumers and help them make informed choices when purchasing wireless services.”¹¹⁰

While wireless providers take seriously input from policymakers on billing and customer practice – and have acted in response to this input – formalizing this process through the adoption of highly detailed regulations would set back all these efforts by impeding the ability of providers to respond quickly to customer and policymaker feedback and by freezing in place the state of the market at the particular moment the rules are written. The Commission is a deliberative body subject to the requirements of the Administrative Procedure Act, and simply cannot act in as swift a fashion as the rapidly moving wireless marketplace demands. The best and most valuable role that regulators play is in bringing potential changes to light so that carriers can promptly and effectively respond to consumer demands and concerns.

C. The Wireless Ecosystem Has Expanded Beyond the Customer-Carrier Relationship and Provides Consumers A Myriad Of Options To Obtain Information at Every Level.

Consumers no longer depend wholly on their wireless service provider for information about all the aspects of how to use their wireless service. The wireless marketplace has evolved to represent a complete ecosystem of companies, and consumers interact with each of these entities directly rather than relying on their service provider to act as a middleman.

review of wireless offerings).

¹¹⁰ *Thirteenth CMRS Competition Report* ¶¶ 177-78.

In considering whether consumers have all the information they need to make educated choices about how they use their service, therefore, the Commission must look beyond what is provided by carriers and consider how consumers behave in today's wireless world. This would lead to an examination not only of service providers but also of the other "core elements" of the wireless market ecosystem as well. These elements include infrastructure vendors, device manufacturers, operating systems, operating systems developers, application developers, and for the purpose of sales – unaffiliated vendors and stores.

Consumers recognize that each of these elements play an integral role and touch their overall wireless service and therefore seek out information from them. For example, thousands of people turn to Apple for information related to the applications, broadband and mobile service capabilities of their iPhones as well as questions about their voice and data service.^{111/} Consumers interested in the various Blackberry models and their various features are much more likely to visit www.blackberry.com to research that information than to go to the website of the provider that will offer the service over which the Blackberry runs.¹¹² The proliferation of websites that offer professional reviews of devices, such as www.cnet.com and alternative online retailers such as amazonwireless.com offer consumers additional guidance.¹¹³

Given the rapidly changing face of wireless broadband, there is no warrant for regulating this evolving marketplace. Within this marketplace, all of the entities in this wireless ecosystem work together to ensure that customers receive the highest-quality, most innovative service

¹¹¹ See Apple.com, Support, Apple Discussions: Forum : Phone and Messaging, at <http://discussions.apple.com/forum.jspa?forumID=1139> (last visited Oct. 5, 2009).

¹¹² See Blackberry Support and Services, at <http://na.blackberry.com/eng/support/> (last visited Oct. 5, 2009).

¹¹³ See CNET, Reviews and advice on mobile phones, cell phone accessories, Bluetooth headsets, and more, at <http://reviews.cnet.com/cell-phones/?tag=TOCleftColumn>; amazonwireless.com (a new website by Amazon.com that offers cell phones and wireless plans) (last visited Oct. 8, 2009).

available. Many of these entities are beyond the FCC's jurisdiction. It would make little sense to adopt regulations directed only at one of the means – via carriers – in which important information reaches consumers. But the more fundamental point is that such regulation is unnecessary for any of the ecosystem participants, and that regulation – particularly asymmetrical regulation – is likely to only result in stifling the self-generated innovation and outreach efforts that characterize the industry today and will create customer confusion to the detriment of the public interest.

V. GIVEN THE UNIQUE VALUE OF MOBILITY, A “SCHUMER BOX” FOR WIRELESS BROADBAND WILL NOT PROVIDE MEANINGFUL CONSUMER INFORMATION

The NOI asks whether information disclosure requirements that govern other industries, such as the “Schumer Box” regulations that apply to credit cards,¹¹⁴ would be appropriate for communications services companies.¹¹⁵ In particular, wireless and wireline broadband services have several critical differences that render a direct comparison between them of limited value. Requiring all communications companies to disclose identical information would not only fail to provide consumers the tools they need to understand their services but would likely decrease the broad range of choices that consumers have. Decreasing the number of options available to consumers would be bad from every perspective.

First, as described above, the vast options that wireless services offer to consumers through service bundles have brought consumers great benefits, are extremely popular with

¹¹⁴ Senator Schumer (D-NY), then Representative Schumer, authored a provision in the 1988 Truth-in-Lending Act (TILA) that created the “Schumer Box,” which required all credit card solicitations to provide card terms and conditions in a “clear and conspicuous manner,” and in tabular form. Press Release, Senator Charles E. Schumer (D-NY), Federal Reserve Board Approves “Schumer Box” Truth in Lending Regulations (Sept. 28, 2000) *available at* http://schumer.senate.gov/1-Senator%20Schumer%20Website%20Files/pressroom/press_releases/PR00315.html.

¹¹⁵ *NOI* ¶ 47.

consumers, and would not fit cleanly within the “box” structure. In fact, the likely result of the imposition of a “Schumer Box” would be a reduction in innovative service offerings and bundles. Carriers will bundle services in ways that may “look better” in the box structure, but will result in little innovation that doesn’t fit within predefined categories, and, as a result, fewer options. In order to maintain wireless providers’ ability to package the services consumers want in ways that meet market demands, the Commission should reject calls for a homogenized information box to describe broadband services.

Second, suggestions that there is a simple way to compare wireless broadband services to wired broadband service ignore the impact of mobility. Wireless broadband is not a third pipe to the home, rather it is broadband to the person, wherever and whenever they want access. There is no way to reflect the value of this unique benefit in a box format.

Finally, wireless and wireline broadband service is not easily compared due to the difference in the two services’ underlying infrastructure, which affects wireless service providers’ ability to predict speed thresholds:

- The capacity of a wireless cell site is shared between all users in that cell. The wireless user must share the available bandwidth with other users in their vicinity.¹¹⁶
- The capacity of a cell is shared between all services running over the network. Wireless voice and data use share the finite capacity of the cell.
- Wireless providers cannot “build their way out” of spectrum constraints. Unlike wired services that can add capacity through greater buildout, constraints on expansion of network capacity are a reality for spectrum-based services. In the absence of significant additional spectrum allocations, wireless networks must be managed to maximize the consumer benefit from the network.

¹¹⁶ See Opposition of CTIA, RM-11361 (filed Apr. 30, 2007), Attachment C (Jackson Paper) at 3.1.1; see also Marius Schwartz and Federico Mini, *Hanging up on Carterfone: The Economic Case Against Access Regulation in Mobile Wireless* at 19 (May 2, 2007), available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=984240 (last visited Sept. 24, 2009).

As Verizon Vice President David Young has observed, “Traffic spikes are more predictable on wireline networks because ISPs know where users are located. Wireless users are mobile and sometimes mass at cell sites that don't usually face high levels of traffic.”¹¹⁷ Because wireless providers are less able to make such predictions, forcing them to “disclose” such information would be a highly unreliable way of providing consumers information about the service.

The differences between these two broadband technologies, and the pitfalls of attempting to fit wireless broadband into a “Schumer Box” are most evident in the attempts at a consumer disclosure box release by public interest groups in the wake of this NOI. For example, the New America Foundation has released their proposed consumer disclosure box for broadband services.¹¹⁸ New America’s proposed disclosures succinctly illustrate the fallacy that wired and wireless broadband options can be compared through a simple box of consumer disclosures. Nowhere on New America’s proposal is there any way to tell if the service being offered in a mobile, fixed or nomadic broadband service. Yes, a savvy consumer would realize that DOCSIS is a cable modem standard, but the disclosure box is not intended to educate only savvy broadband customers, but all customers. Another problem with the proposed box is the “service technology” box itself. On wireless networks across the U.S., there are no fewer than seven wireless broadband technologies used throughout wireless broadband networks (EV-DO Rev. 0, EV-DO Rev. A, UMTS, HSPA, HSDPA, HSPA+, and WiMAX) with additional 4G technology deployments announced for next year. As consumers move from area-to-area, as mobility offers, they may find themselves moving from a 4G coverage area, into a 3G coverage area, or even to

^{117/} *Genachowski Takes Wrap Off Planned Net Neutrality Rulemaking*, COMMUNICATIONS DAILY, Sept. 22, 2009.

an area where they will have first generation data service coverage. Unlike in the static cable or landline environment, in the mobile environment, the service being offered varies based on location, technology upgrades, handset capabilities, and more. This distinction isn't recognized by New America and doesn't easily fit into a box for consumer comparison.

The charts below detail some of the voice and data offerings of a sampling of U.S. wireless providers. As seen in the charts, the variety of options that the industry offers consumers, including the bundles and "extras" described below are unlikely to fit into a pre-ordained box of disclosures.

¹¹⁸ "Broadband Truth-in-Labeling", New America Foundation *available at* http://www.newamerica.net/publications/policy/broadband_truth_labeling (last accessed Oct. 13, 2009).

Voice Only Wireless Mobile Plan Options for Individual Subscribers¹¹⁹

	Buckets-of-Minutes	Nights and Weekends	In-Network	Extras
AT&T¹²⁰	<ul style="list-style-type: none"> ○ 450 ○ 900 ○ 1350 ○ Unlimited 	Unlimited nights 9pm-6am, and weekends for 900 plan and higher; 5000 minutes for 450 plan. Option to changes nights and weekends to 7pm-7am.	Unlimited.	No roaming charges on any plan; allow customers to rollover unused minutes between months.
Cellular South¹²¹	<ul style="list-style-type: none"> ○ 700 ○ 1400 ○ Unlimited regional, 750 national 	Unlimited nights and weekends (M-F 7pm-6:59am; 7pm Fri-6:59am Mon.). Free nights and weekends only for regional calls for 750 plan.	Free nationwide for 700 and 1400, regional for 750.	No activation fee.
Cincinnati Bell¹²²	<ul style="list-style-type: none"> ○ 200 ○ 500 ○ 1000 ○ 2000 	1000 minutes for 200 plan; unlimited for remaining plans; nights are M-F, 9pm-6am; Weekends all day Sat. and Sun.	Free local-to-local calling for all plans except 200.	No contract. No early termination fees.
Cricket¹²³	<ul style="list-style-type: none"> ○ One voice-only plan, includes unlimited local minutes. 	N/A	N/A	No contract.

¹¹⁹ Information gathered from each carrier's website between 9/28/09 and 10/02/03. When a zip code was required, 20554 was used, unless noted otherwise. All plans are monthly. Plans that were bundled with any messaging or data services were excluded; this matrix is exclusively voice-only plans.

¹²⁰ <http://www.wireless.att.com/cell-phone-service/cell-phone-plans/individual-cell-phone-plans.jsp>

¹²¹ https://www.cellularsouth.com/cscommerce/products/plans/category_plan_list_individual.jsp?id=cat320003

¹²² http://www.cincinnati-bell.com/consumer/wireless/rate_plans/

¹²³ <http://www.mycricket.com/cricketplans/washingtondc>. Note: caller ID, voice mail, and call waiting available for additional fee.

	Buckets-of-Minutes	Nights and Weekends	In-Network	Extras
MetroPCS¹²⁴	<ul style="list-style-type: none"> ○ One voice-only plan, includes unlimited local and nationwide long-distance. 	N/A	N/A	No contract or activation fee. First month free. Flat rate billing.
Sprint¹²⁵	<ul style="list-style-type: none"> ○ 200 ○ 200 month-to-month ○ 450 ○ 900 	Unlimited nights and weekends starting at 9pm for 200 minute plan (for additional fee, can start as early as 7pm). Unlimited nights and weekends starting at 7pm for 450 and 900 minute plans (for additional fee, can start at 6 pm).	Unlimited for 450 and 900 minute plans.	No roaming charges for all plans but month-to-month plan. As a bundle with data plan, offer Any Mobile, Anytime, which allows unlimited calling to any mobile phone on any network.
T-Mobile¹²⁶	<ul style="list-style-type: none"> ○ “myFaves” <ul style="list-style-type: none"> ○ 300 ○ 600 ○ 1000 ○ 1500 ○ “Individual” <ul style="list-style-type: none"> ○ 300 ○ 600 ○ 1000 ○ 1000+ ○ 1500 ○ 3000 local 	Unlimited nights and weekends for all plans excluding 1000 Individual and 3000 local plans. Unlimited weekends for Individual 300 plan. Nights are M-F 9:00pm-6:59am; weekends are Midnight Fri-Midnight Sun.	Unlimited for 600, 1000, or 1500 plans in myFaves. Unlimited for 1000+, 1500, and 3000 local plans in Individual.	myFaves allows unlimited calling to any 5 numbers, out-of-network and landlines included. No domestic digital roaming charges. Offer FlexPay contracts for most plans, which allows consumers to purchase any phone at retail, and avoid overages, deposits, and activation fees. Option for placing unlimited voice calls over Wi-Fi.

¹²⁴ <http://www.metropcs.com/plans/>. Note: plans based on 75201 zip code.

¹²⁵ http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/SubmitRegionAction?isUpgradePathForCoverage=false&currZipCode=&upgradeOption=&nextPage=DisplayPlans&equipmentSKUurlPart=%3FcurrentPage%3DratePlanPage&filterStringParamName=filterString%3DIndividual_Plans_Filter&newZipCode=20554

¹²⁶ http://www.t-mobile.com/shop/plans/Cell-Phone-Plans.aspx?catgroup=Individual-cell-phone-plan&WT.mc_n=Individual_PlanFirstTile1&WT.mc_t=OnsiteAd

U.S. Cellular ¹²⁷	<ul style="list-style-type: none"> o 450 o 650 o 900 o 1000 o 1350 o 2000 o Unlimited 	Unlimited nights beginning at 9pm for the 450 and 650 plans, and unlimited weekends (all day Sat. and Sun.). Unlimited nights beginning at 7pm for the remaining plans and unlimited weekends (all day Sat. and Sun.)	Unlimited for 650 plan and up with a two-year contract.	No activation fee.
Verizon ¹²⁸	<ul style="list-style-type: none"> o 450 o 900 o 1350 o Unlimited 	Unlimited nights and weekends (M-F 9:01pm-5:59am; 12:01am Sat-11:59pm Sun).	Unlimited.	At 900 minutes and up, unlimited calling to and from 5 out-of-network friends and family members; landlines included.

¹²⁷ http://www.uscc.com/uscellular/SilverStream/Pages/b_plan.html?zip=60601&mkt=608830&tm=1&tabPlan=2. Note: plans based on 60601 zip code.

¹²⁸ <http://www.verizonwireless.com/b2c/store/controller?item=planFirst&action=viewPlanList&sortOption=priceSort&typeId=1&subTypeId=19&catId=323>

Text, Data, and Unlimited Wireless Mobile Plan Options for Individual Subscribers¹²⁹

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans ¹³⁰
AT&T	<p>For voice only plans, three messaging options:¹³¹</p> <ul style="list-style-type: none"> ○ 200 ○ 1500 ○ Unlimited ○ 100 international 	<p>Three plans:</p> <ul style="list-style-type: none"> ○ Unlimited nationwide data without messaging ○ Unlimited nationwide data bundled with unlimited messaging ○ Unlimited nationwide data bundled with AT&T navigator. 	<p>Basic plan includes minutes, data, and e-mail. Premium plan includes minutes, data, e-mail, and unlimited messaging. Data only plans available. Data with tethering available.¹³²</p>	<p>Unlimited plan includes:¹³³</p> <ul style="list-style-type: none"> ○ Unlimited voice minutes ○ Unlimited domestic long-distance ○ Unlimited roaming
Cellular South¹³⁴	<p>Text messaging included with unlimited voice and 200 minute plan.¹³⁵</p> <p>Unlimited text messaging offered for all other voice only plans.¹³⁶</p> <p>Picture message plans available for all plans, but must first add data plan.¹³⁷</p>	<p>One plan offering unlimited regional data access.¹³⁸</p>	<p>One smartphone-only plan with limited minutes, unlimited nationwide text messaging, nationwide data, and e-mail.¹³⁹</p> <p>Except for unlimited plan and smart phone plan, text, data, e-mail, and voice are not bundled.¹⁴⁰</p>	<p>Two plans, one with:</p> <ul style="list-style-type: none"> ○ Unlimited domestic long-distance ○ Unlimited voice ○ Unlimited nationwide text and picture messaging ○ Unlimited regional data.¹⁴¹ <p>The second, a smartphone-only plan, includes all the same features plus unlimited nationwide data.¹⁴²</p>

¹²⁹ Information gathered from each carrier's website between 9/28/09 and 10/02/03. When a zip code was required, 20554 was used, unless noted otherwise. Unless noted otherwise, "messaging" includes text and picture messaging, and may include video messaging and instant messaging. When noted, "e-mail" is e-mail that is pushed to the user's device. The lists of features in unlimited column are not exhaustive; basic features such as caller ID and call waiting were excluded from features lists, as were most features unique to a particular carrier. All messaging plans are domestic, unless noted otherwise. All plans are monthly. Data plan list excludes plans that provide access only to walled web and/or carrier downloads.

¹³⁰ Unlimited plans listed outline most of the features available with an unlimited voice plan.

¹³¹ <http://www.wireless.att.com/cell-phone-service/services/services-list.jsp?catId=cat1470003&catName=Messaging+%26+Data>

¹³² <http://www.wireless.att.com/cell-phone-service/cell-phone-plans/pda-personal-plans.jsp>

¹³³ http://www.wireless.att.com/cell-phone-service/cell-phone-plan-details/?q_sku=sku3830293&q_planCategory=cat1370011

¹³⁴ https://www.cellularsouth.com/cscommerce/products/plans/category_plan_list_individual.jsp?id=cat320003

¹³⁵ https://www.cellularsouth.com/cscommerce/products/plans/category_plan_list_individual.jsp?id=cat320003

¹³⁶ https://www.cellularsouth.com/cscommerce/products/features/category_features_list.jsp?_DARGS=/cscommerce/cart/util/genie/fragments/package.jsp_A&_DAV=r16819985&navAction=jump&navCount=0&id=cat5500

¹³⁷

¹³⁸ https://www.cellularsouth.com/cscommerce/products/features/category_features_list.jsp?_DARGS=/cscommerce/cart/util/genie/fragments/package.jsp_A&_DAV=r16819985&navAction=jump&navCount=0&id=cat5500

¹³⁹

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
Cincinnati Bell	<p>Text messaging included in unlimited plan, premium plans, and in 200 minute plan.¹⁴³</p> <p>For voice only plans, three text messaging options:¹⁴⁴</p> <ul style="list-style-type: none"> o 500 o 1000 o 500 with 1MB of media use o Unlimited 	<p>Two plans:</p> <ul style="list-style-type: none"> o 1 MB o Unlimited¹⁴⁵ <p>Data is bundled with premium plans.¹⁴⁶</p>	<p>Two options, largely depending on the phone, for non-blackberry smartphones:</p> <ul style="list-style-type: none"> o Unlimited data with choice of pay for use messaging or unlimited messaging. o Unlimited messaging and unlimited data. <p>Blackberry only plans:¹⁴⁷</p> <ul style="list-style-type: none"> o Choice of unlimited or pay-per-use text o Choice of unlimited e-mail, excluding data, and unlimited data, including e-mail o Unlimited text with unlimited data, e-mail, and enterprise service. 	<p>Unlimited plan includes:¹⁴⁸</p> <ul style="list-style-type: none"> o Unlimited text messaging o Unlimited data o Unlimited voice o Unlimited roaming

¹³⁸https://www.cellularsouth.com/cscommerce/products/features/category_features_list.jsp?_DARGS=/cscommerce/cart/util/genie/fragments/package.jsp_A&_DAV=r16819985&navAction=jump&navCount=0&id=cat55006

¹³⁹https://www.cellularsouth.com/cscommerce/products/plans/product_plan_details.jsp?navAction=push&navCount=0&id=prod22450057

¹⁴⁰https://www.cellularsouth.com/cscommerce/products/features/category_features_list.jsp?_DARGS=/cscommerce/cart/fragments/package_content.jsp.2_A%3A_D%3A/atg/commerce/order/purchase/CartModifierFormHandler.addItem&_DAV=r16819985&navAction=jump&navCount=0&id=cat550006

¹⁴¹https://www.cellularsouth.com/cscommerce/products/features/category_features_list.jsp?_DARGS=/cscommerce/cart/fragments/package_content.jsp.2_A%3A_D%3A/atg/commerce/order/purchase/CartModifierFormHandler.addItem&_DAV=r16819985&navAction=jump&navCount=0&id=cat550006

¹⁴²https://www.cellularsouth.com/cscommerce/products/plans/product_plan_details.jsp?id=prod26340022

¹⁴³http://www.cincinnati-bell.com/consumer/wireless/rate_plans/

¹⁴⁴http://www.cincinnati-bell.com/consumer/wireless/rate_plans/

¹⁴⁵<http://www.cincinnati-bell.com/consumer/wireless/cart/>

¹⁴⁶http://www.cincinnati-bell.com/consumer/wireless/rate_plans/

¹⁴⁷http://www.cincinnati-bell.com/consumer/wireless/rate_plans/

¹⁴⁸http://www.cincinnati-bell.com/consumer/wireless/rate_plans/popup_unlimitedsingle.asp. Note: Blackberry phones require an additional, required, blackberry data package.

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
Cricket	<p>Unlimited nationwide messaging bundled with all but one basic voice plan.¹⁴⁹ Some bundles include text and picture messaging, messaging to Mexico, and international messaging.¹⁵⁰</p> <p>Separate unlimited nationwide text and picture messaging plans available for basic phone plan.</p>	<p>Unlimited data bundled with three of six plans.¹⁵¹</p> <p>Unlimited data available for other three plans.</p>	<p>Unlimited data and e-mail plan; messaging not bundled.</p>	<p>All plans include unlimited voice minutes.</p> <p>Plan with most unlimited features includes:¹⁵²</p> <ul style="list-style-type: none"> ○ Unlimited text, picture, and international messaging ○ Unlimited data ○ Unlimited voice ○ Unlimited long-distance ○ Extended national coverage ○ Unlimited directory service ○ 200 nationwide roaming minutes

¹⁴⁹ <http://www.mycricket.com/cricketplans/>

¹⁵⁰ <http://www.mycricket.com/cricketplans/washingtondc>

¹⁵¹ <http://www.mycricket.com/cricketplans/washingtondc>

¹⁵² <http://www.mycricket.com/cricketplans/washingtondc>

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
MetroPCS	<p>Unlimited text messaging included with three-of-four plans.¹⁵³</p> <p>For one voice-only plan, unlimited text messaging available.</p> <p>Unlimited picture messaging available for two-of-four plans for which it is not included.</p>	<p>Data available as bundle with two-of-four voice plans.</p>	<p>Two phone-specific smartphone plans, which include:¹⁵⁴</p> <ul style="list-style-type: none"> o Unlimited text and picture messaging o Unlimited data o Unlimited e-mail o Enterprise e-mail support included in one, extra in the other 	<p>All plans include unlimited voice minutes.¹⁵⁵</p> <p>Plan with most unlimited features includes:¹⁵⁶</p> <ul style="list-style-type: none"> o Unlimited text, picture, and international messaging o Unlimited data o Unlimited voice o Unlimited long-distance o Extended national coverage o Unlimited GPS service o Unlimited e-mail o Unlimited premium directory assistance
Sprint ¹⁵⁷	<p>Unlimited nationwide messaging included in the top three (of five) voice plans.¹⁵⁸</p> <p>For the two voice only plans:</p> <ul style="list-style-type: none"> o 300 domestic messages o 1000 domestic messages o Unlimited domestic messaging. 	<p>Unlimited nationwide data available for the three (of five) plans that lack a data bundle. The unlimited data plan is not bundled with unlimited messaging.</p> <p>Unlimited nationwide data included in unlimited everything plan, and plan with limited voice but unlimited data and messaging.¹⁵⁹</p> <p>Offer an unlimited nationwide data plan without a voice plan.</p>	<p>Do not differentiate between regular mobile data plans and smartphone data plans.</p> <p>Separate blackberry-only plan available for enterprises.</p>	<p>Unlimited plan includes:¹⁶⁰</p> <ul style="list-style-type: none"> o Unlimited voice minutes o Unlimited domestic messaging o Unlimited domestic long distance o Unlimited roaming o Unlimited data o Unlimited GPS service o Unlimited e-mail

¹⁵³ <http://www.metropcs.com/plans/Default.aspx>

¹⁵⁴ <http://www.metropcs.com/plans/>

¹⁵⁵ <http://www.metropcs.com/plans/>

¹⁵⁶ <http://www.metropcs.com/plans/>

¹⁵⁷ http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/SubmitRegionAction?isUpgradePathForCoverage=false&currZipCode=&upgradeOption=&nextPage=DisplayPlans&equipmentSKUurlPart=%3FcurrentPage%3DratePlanPage&filterStringParamName=filterString%3DIndividual_Plans_Filter&newZipCode=20554

¹⁵⁸ <http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/DisplayPlans>

¹⁵⁹ <http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/DisplayPlans>

¹⁶⁰ http://nextelonline.nextel.com/NASApp/onlinestore/en/Action/DisplayPlans?filterString=Individual_Plans_Filter&id12=UHP_PlansTab_Link_IndividualPlans

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
T-Mobile	<p>Unlimited nationwide messaging bundled with unlimited voice plan.¹⁶¹</p> <p>For all other voice plans, nationwide messaging plans include:¹⁶²</p> <ul style="list-style-type: none"> ○ 300 messages ○ 1000 messages ○ Unlimited messaging 	<p>Two data plans:</p> <ul style="list-style-type: none"> ○ Unlimited nationwide data with no messaging ○ Unlimited data and messaging. <p>Unlimited data is not bundled with unlimited voice and messaging plan</p>	<p>Basic plan includes voice minutes, data, and e-mail, with the same messaging options as in the first column.</p> <p>Premium plan includes everything in basic plus unlimited messaging.</p> <p>Separate blackberry-only plan available for enterprises.</p>	<p>Unlimited plan includes:¹⁶³</p> <ul style="list-style-type: none"> ○ Unlimited voice minutes ○ Unlimited domestic messaging ○ Unlimited domestic long distance ○ Unlimited roaming

¹⁶¹ <http://www.t-mobile.com/shop/plans/cell-phone-plans-detail.aspx?tp=tb1&rateplan=Individual-Unlimited>

¹⁶² http://www.t-mobile.com/shop/addons/services/information.aspx?PAsset=Messaging&oscid=4CD51BA7-B5AF-4AB2-85E0-50EC0AF141F9,7BEE06FF-8DD3-4220-9BA6-86D80709D8CD&tp=Svc_Tab_TextMessaging

¹⁶³ <http://www.t-mobile.com/shop/plans/cell-phone-plans-detail.aspx?tp=tb1&rateplan=Individual-Unlimited>

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
U.S. Cellular ¹⁶⁴	<p>Messaging is not bundled with any voice plan.¹⁶⁵</p> <p>Text messaging plans include:¹⁶⁶</p> <ul style="list-style-type: none"> ○ 250 messages ○ 750 messages ○ Unlimited (includes picture, text, and video) <p>Picture and video messaging plans include:¹⁶⁷</p> <ul style="list-style-type: none"> ○ 20 messages ○ 50 messages ○ 100 messages ○ Unlimited (includes text) 	<p>Two data plans:¹⁶⁸</p> <ul style="list-style-type: none"> ○ Unlimited data with e-mail ○ Unlimited data with e-mail, and unlimited messaging. 	<p>Only one smartphone only plan, which includes unlimited data, e-mail, messaging, and GPS.¹⁶⁹</p> <p>Specific plan available for Blackberry.¹⁷⁰</p>	<p>Unlimited plan includes:¹⁷¹</p> <ul style="list-style-type: none"> ○ Unlimited incoming text messages ○ Unlimited incoming calls ○ Unlimited mobile-to-mobile calls ○ Unlimited nights and weekends ○ Unlimited domestic long distance

¹⁶⁴ Note: plans based on 60601 zip code.

¹⁶⁵ http://www.uscc.com/uscellular/SilverStream/Pages/b_plan.html?zip=60601&mkt=608830&tm=1&tabPlan=2

¹⁶⁶ http://www.uscc.com/uscellular/SilverStream/Pages/x_page.html?p=mobmess_Menu_Features

¹⁶⁷ <http://easyedge.uscc.com/easyedge/PictureMessaging.do?1011#plans>

¹⁶⁸ <http://easyedge.uscc.com/easyedge/jsp/plans.jsp>

¹⁶⁹ <http://easyedge.uscc.com/easyedge/jsp/plans.jsp>. Note: Blackberry and WindowsMobile specific plans available, but details are not posted online.

¹⁷⁰ Details of plan not posted online.

¹⁷¹ http://www.uscc.com/uscellular/SilverStream/Pages/b_plan.html?zip=60601&mkt=608830&tm=1&tabPlan=2

	Messaging Plans	Non-smartphone Data Plans	Smartphone Data Plans	Unlimited Plans
Verizon	<p>Unlimited nationwide messaging included for Select, Connect, and Premium plans (3 of 4 total plans).¹⁷²</p> <p>Messaging options for Basic voice plan:¹⁷³</p> <ul style="list-style-type: none"> o 250 messages o 500 messages plus unlimited in-network messaging o 1500 messages plus unlimited in-network messaging o 5000 messages plus unlimited in-network messaging <p>Unlimited nationwide messaging available without voice plan.¹⁷⁴</p>	<p>Data plan options, which exclude push e-mail, for Basic and Select plans (2 most basic plans):</p> <ul style="list-style-type: none"> o 25 MB o 75 MB <p>Unlimited nationwide data and push e-mail for Connect and Premium plans.¹⁷⁵</p> <p>Unlimited nationwide data plans, with and without push e-mail, available without voice plan.¹⁷⁶</p>	<p>Basic plan include voice minutes, unlimited data, and e-mail, with the same messaging options as available for the Basic voice plan (see first column).¹⁷⁷</p> <p>Premium plan includes voice minutes, data, unlimited e-mail, and unlimited national messaging.</p> <p>Unlimited data, nationwide messaging, and e-mail available without voice plan.¹⁷⁸</p> <p>Separate enterprise plan available for blackberry.</p>	<p>Unlimited plan includes:¹⁷⁹</p> <ul style="list-style-type: none"> o Unlimited nationwide messaging o E-mail o Unlimited data o Unlimited GPS service o Unlimited voice minutes

¹⁷² <http://www.verizonwireless.com/b2c/splash/plansingleline.jsp?lid=//global//plans//voice+plans//individual>.

¹⁷³ Messaging options can be viewed online by first selecting a plan and a phone.

¹⁷⁴ <http://www.verizonwireless.com/b2c/splash/messagingplans.jsp>

¹⁷⁵ <http://www.verizonwireless.com/b2c/splash/plansingleline.jsp?lid=//global//plans//voice+plans//individual>

¹⁷⁶ <http://www.verizonwireless.com/b2c/splash/messagingplans.jsp>

¹⁷⁷ <http://www.verizonwireless.com/b2c/store/controller?item=planFirst&action=viewPlanList&sortOption=priceSort&typeId=3&subTypeId=50&catId=947>

¹⁷⁸ <http://www.verizonwireless.com/b2c/splash/messagingplans.jsp>

¹⁷⁹ <http://www.verizonwireless.com/b2c/store/controller?item=planFirst&action=viewPlanList&sortOption=priceSort&typeId=1&subTypeId=19&catId=323>

VI. THE COMMISSION MUST TAKE INTO ACCOUNT THE SIGNIFICANT COSTS OF REGULATION

Before determining to saddle the broadband industry with extensive and unnecessary regulation, the Commission should consider all the significant costs that would accompany such a decision.

First, there are very real costs associated with complying with any regulation, but especially those that address billing. Especially in these difficult economic times, complying with such regulations impacts all carriers. But such requirements would have a particularly negative effect on small carriers.¹⁸⁰ Small providers are negatively impacted by increased regulation because they lack the efficiencies of scale of the larger carriers and their cost of compliance with new mandates, on a per-subscriber basis, is often larger.¹⁸¹ They therefore “bear a disproportionate share of the federal regulatory burden.”¹⁸² For any-sized carrier, however, the costs of regulation divert limited resources from other uses, such as deploying additional sites to cover previously unserved areas.

In addition to the direct costs to service carriers, increased regulation has a larger impact on the market as a whole. Congress and the Commission repeatedly have recognized that regulation has a chilling effect on the deployment of new technologies, raises the cost of services, and diverts funds that could be used to create or obtain additional services, thereby discouraging new subscribers.¹⁸³ If carriers are forced to expend scarce resources on complying

¹⁸⁰ Kenneth Johnson, *Beast of Burden: Regulatory Compliance and the Small Carrier*, RURAL TELECOMMUNICATIONS, Vol. 27, No. 1, Jan. 1, 2008, at S5, S10-S11.

¹⁸¹ *Wireless Industry Sees Hurdles For Emergency Alert Adoption*, COMMUNICATIONS DAILY, Nov. 15, 2004.

¹⁸² *Id.*

¹⁸³ *See, e.g., TCI Cablevision of Oakland County, Inc.*, Memorandum Opinion and Order, 12 FCC Rcd 21396, 21441-42 ¶¶ 105-106 (1997) (regulatory over-reaching will discourage both competition and

with new regulation, there will also be a very real effect on their allocation of existing resources.¹⁸⁴ Carriers make difficult decisions every day about how to invest revenues and work hard to ensure that each investment benefits the network and the subscribers to the greatest extent possible, so that they can get the most out of each limited dollar they spend. If they must instead divert some of those resources to regulatory compliance, other needed expenditures will suffer. Moreover, increased regulation could thwart larger FCC and Congressional efforts to promote spending on broadband infrastructure.

Regulations requiring a standardized bill or advertising will also interfere with carriers' attempts to distinguish themselves in the marketplace and so hurt competition.¹⁸⁵ As discussed above, wireless carriers go to great lengths to distinguish themselves and their services from those of other wireless carriers. How their bills and advertisements look, and how the consumer experiences them, is an important part of this effort. Mandating how a carrier must convey information to its customers will eliminate their ability to innovate in this manner, hinder competition and stifle diversity,¹⁸⁶ all to the detriment of consumers.

VII. THE COMMISSION SHOULD CONSIDER THE LEGAL IMPACTS OF REGULATION IN THIS AREA

As the Commission considers regulation in this area it should be cognizant of the effect that imposition of regulations would have on providers' First Amendment-protected rights to

new services); *2000 Biennial Regulatory Review: Spectrum Aggregation Limits For Commercial Mobile Radio Services, Report and Order*, 16 FCC Rcd 22668, 22677-79 ¶¶ 22-25 (2001) (discussing Congress' and, consequently, the Commission's preference for de-regulation over regulation).

¹⁸⁴ *Non-Regulatory Paths Beckon for Open Wireless Networks*, COMMUNICATIONS DAILY, Apr. 3, 2008.

¹⁸⁵ *Unnecessary Regulation of the Internet Is Harmful to Consumers; Over-Regulation Will Delay Innovation, Stifle Growth, Says Free-Market Advocacy Organization*, PR NEWSWIRE U.S., Feb. 1, 2007.

¹⁸⁶ Brian O'Hara & Erica Tetuan, *Telecom Act REWRITE: What's at Stake?*, RURAL TELECOMMUNICATIONS, Vol. 24; Issue 1, Jan. 1, 2005.

communicate freely and truthfully with their subscribers. Monthly bills are one of the primary ways that wireless providers communicate with their customers, and in a competitive environment in which consumers have a choice of providers, it is critical that providers be able to speak freely with their subscribers, unfettered by burdensome and potentially confusing restrictions on those communications. While the government may regulate speech to prevent fraudulent and misleading statements regulations aimed at “clarifying” billing and advertising practices or specifying typeface size do not protect consumers against such practices. Similarly, prescriptive regulations mandating the manner in which broadband providers must detail the terms, conditions, features, speeds, costs, and options for broadband service is an area where First Amendment rights of broadband providers may be implicated.

The Supreme Court has made clear that commercial speech is protected by the First Amendment, and that government regulation of a company’s speech must directly advance a substantial government interest and be narrowly tailored to serve that interest.¹⁸⁷ If the regulation does not directly advance the government interest involved, or if the governmental interest could be served as well by a more limited restriction on commercial speech, the restriction cannot survive.¹⁸⁸

¹⁸⁷ See, e.g., *Central Hudson Gas & Elec. Corp. v. Public Service Commission of New York*, 447 U.S. 557, 564 (1980); *Edenfield v. Fane*, 507 U.S. 761, 770 (1993); *Zauderer v. Office of Disciplinary Counsel*, 471 U.S. 626, 648 (1985). In *Central Hudson* (at 564), the Supreme Court set forth the standard for evaluating government regulation of commercial speech:

If the communication is neither misleading nor related to unlawful activity, the government's power is more circumscribed. The State must assert a substantial interest to be achieved by restrictions on commercial speech. Moreover, the regulatory technique must be in proportion to that interest. The limitation on expression must be designed carefully to achieve the State's goal. Compliance with this requirement may be measured by two criteria. First, the restriction must directly advance the state interest involved; the regulation may not be sustained if it provides only ineffective or remote support for the government's purpose. Second, if the governmental interest could be served as well by a more limited restriction on commercial speech, the excessive restrictions cannot survive.

¹⁸⁸ *Central Hudson*, 447 U.S. at 564.

Here, there is no evidence that wireless broadband consumers are encountering untruthful, misleading, or incomplete information on their bills or in wireless broadband providers' disclosure practices; quite simply, there is no problem here for the Commission to solve, much less one that would provide the Commission with a substantial interest sufficient to warrant the suppression of truthful speech. The Supreme Court has made clear that, in order to sustain its burden of defending a restriction on commercial speech, a government actor (in this case, the Commission) "must demonstrate that the harms it recites are real and that its restriction will in fact alleviate them to a material degree."¹⁸⁹ There is no evidence of a market failure concerning wireless provider communications with consumers that would justify speech-burdening regulation in this case.

To the contrary, Congress and the Commission have repeatedly identified a substantial government interest in keeping wireless services *unregulated*. Competition among carriers to provide the most consumer-friendly services already guards against any potential harms arising from inadequate or misleading disclosures. Moreover, more limited prophylactic restrictions on speech already exist in the CTIA Consumer Code – and are functioning well in today's marketplace. The First Amendment does not permit speech-burdening regulation of a problem that does not exist.¹⁹⁰ Therefore, the Commission should avoid the constitutional problems associated with regulating wireless carriers' speech altogether.¹⁹¹

¹⁸⁹ *Edenfield*, 507 U.S. at 770-771; *U.S. West v. FCC*, 182 F.3d 1224, 1237 (10th Cir. 1999) ("The government presents no evidence showing the harm to either privacy or competition is real. Instead, the government relies on speculation that harm to privacy and competition for new services will result if carriers use CPNI.").

¹⁹⁰ *Id.*

¹⁹¹ It is not unusual for the Commission to consider First Amendment issues when considering new rules, and to limit or forego action as a result. *See, e.g., In the Matter of Carriage of Digital Television Broadcast Signals, Amendments to Part 76 of the Commission's Rules*, Second Report and Order and First Order on Reconsideration, 20 FCC Rcd 4516, 4523 - 4529 ¶¶ 14-25(2005) (declining to mandate

CONCLUSION

The Commission should continue to trust that competitive market forces will ensure that wireless consumers remain informed and continue to receive the benefits of the constant innovations in the wireless market.

Respectfully Submitted,

/s/ David J. Redl

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October 13, 2009

dual carriage for cable operators due to constitutional problems arising from the lack of a substantial government interest); *In the Matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, Third Report and Order and Third Further Notice of Proposed Rulemaking, 17 FCC Rcd 14860, 14874 ¶ 30 (2002) (taking carrier's First Amendment interests into account as directed by Tenth Circuit Court of Appeals when fashioning CPNI rules).

ATTACHMENT A

Attachment A -

Materials Available at Sprint



**Any Mobile
Anytime**

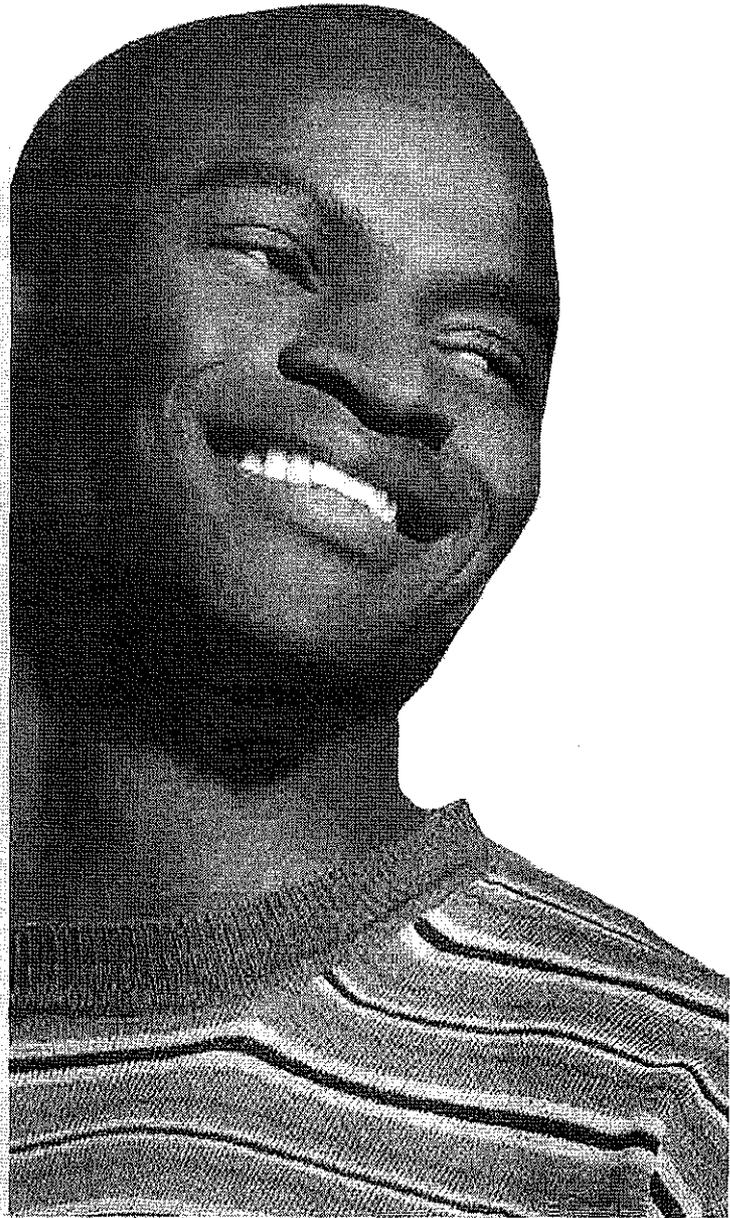
Any Mobile, Anytime™
Unlimited. Mobile. Freedom.

Now get more than before.

Get Any Mobile, Anytime™—unlimited calls to and from any U.S. mobile phone on any wireless carrier—plus unlimited messaging, data and more.

Get it now with any Everything Data Plan or Everything Data Share Plan. Only from Sprint. Only on the Now Network.™

May require up to a \$36 activation fee/line, credit approval & deposit. Up to \$200 early termination fee/line applies. **Everything Data:** Nights: Mon-Thurs. 7pm -7am; Wknds: Fri. 7pm -Mon. 7am. Partial min. charged as full min. **Any Mobile, Anytime (AMA) and Mobile to Mobile:** Applies when directly dialing/receiving standard voice calls between domestic wireless numbers as determined when the call is placed using indep. 3rd party and Sprint databases. Std. roaming rates/restrictions apply. Only available with select Sprint Plans and while on the Nationwide Sprint or Nextel National Networks (excludes calls to voicemail, 411, and other indirect methods). **Messaging:** Includes text, picture and video for domestic messages sent or received. International messages are \$0.20 sent or received. SMS voice messages may incur an additional data charge of \$0.03/KB. **Data:** Premium content/downloads (games, ringtones, songs, certain channels, etc.) are add'l charge. Text to 3rd parties to participate in promotions or other may result in add'l charges. Sprint Music Premier includes access to select radio channels and \$0.99 song downloads. Sprint TV Premier includes select channels. See sprint.com/tvguide for channel information. Content and channel line-up subject to change. GPS Navigation includes Sprint Navigation for Sprint phones or Telenav GPS Navigator for Nextel phones. GPS reliability varies by environment. International services are not included. E-mail Includes use of Sprint Mobile Email, Microsoft Direct Push technology via Active Sync™, Versamail, IBM Lotus Notes Traveler® or BlackBerry® Internet Service (BIS). **Direct Connect:** Nextel and PowerSource devices operate on the Nextel National Network. Sprint devices operate within certain EVDO Rev-A coverage areas on the Sprint Mobile Broadband Network. **Group Connect:** Group Connect (21 max. participants) currently operates between parties on the same push-to-talk network platform. International Direct Connect not included. **Everything Data Share Plan:** Direct Connect and Group Connect not included. **Usage limitation:** Sprint may terminate service if (1) more than 800 minutes, (2) a majority of minutes or (3) a majority of kilobytes in a given month are used while roaming. **Other Terms:** Coverage not available everywhere. Nationwide Sprint & Nextel National Networks reach over 275 & 274 million people, respectively. Offers & service plan features not available in all markets/retail locations or for all phones/networks. Sprint reserves the right to modify, extend or cancel offers at any time. Other restrictions apply. See store or Sprint.com for details.



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Mixed Sources
Product group from well-managed forests, controlled sources and recycled wood or fiber
www.fsc.org
Cert no. SGS-COC-0668

SE9003-1100

If it's mobile, it's unlimited.

With **Any Mobile, Anytime**™ you get unlimited domestic calls to and from any U.S. mobile phone on any wireless carrier, at anytime while on our network. It doesn't matter which mobile phones you call, or which mobile phones call you—that's over 200 million callers.

Any Mobile Anytime

Now get Any Mobile, Anytime™ included on all Everything Data and Everything Data Share plans, plus:

- Unlimited Night and Weekend Calling with Nights starting at 7 PM
- Nationwide Long Distance and No Roaming Charges
- Unlimited Messaging (Text, Picture, Video)
- Unlimited Web
- Unlimited Email
- Unlimited GPS Navigation
- Unlimited Sprint Music Premier
- Unlimited Sprint TV™ Premier

Any Mobile, Anytime™ only available while on the Nationwide Sprint Network or Nextel National Network.

If you're already on the Everything Data Plan or Everything Data Share Plan, you automatically get Any Mobile, Anytime.™ Or if you're a current customer on a different plan, you can switch without extending your agreement.

Individual Plans

Everything Data Plan

Includes Unlimited Direct Connect® and Group Connect®

Monthly Anytime Minutes	Price per month*
450	\$69.99
900	\$89.99

Additional Anytime Minutes for 150-minute plans: 15¢/min.
Additional Anytime Minutes for 300-minute plans: 20¢/min.

Share Plans

Everything Data Share Plan

Monthly Anytime Minutes To share between 2 lines	Price per month*
1500	\$129.99
3000	\$169.99

Media-Phone lines 3-5: \$1.00/mo. per line
Additional Anytime Minutes for 1500-minute plans: 46¢/min.
Additional Anytime Minutes for 3000-minute plans: 25¢/min.

No plan change required for customers currently on Everything Data plans. Existing customers on other Sprint plans can switch to any of these plans without a contract extension. Available on new lines of activation with a two-year agreement per line.

*Monthly charges exclude taxes, Sprint Surcharges (incl. USF charge of up to 12.9% (varies quarterly), Administrative Charge (up to \$1.99/line/mo.), Regulatory Charge (\$0.20/line/mo.) & state/local fees by area). Sprint Surcharges are not taxes or gov't-required charges and are subject to change. Details: www.sprint.com/taxesandfees.

Please see back panel or Plans brochure for additional information and important Terms & Conditions for all Sprint Service Plans and other additional features.

Sprint 

Plans

Work. Home. Everything.

①



Welcome to Now

*The home of advanced technology, exceptional service
and a dependable 3G network that gives you what you want
in real time.*

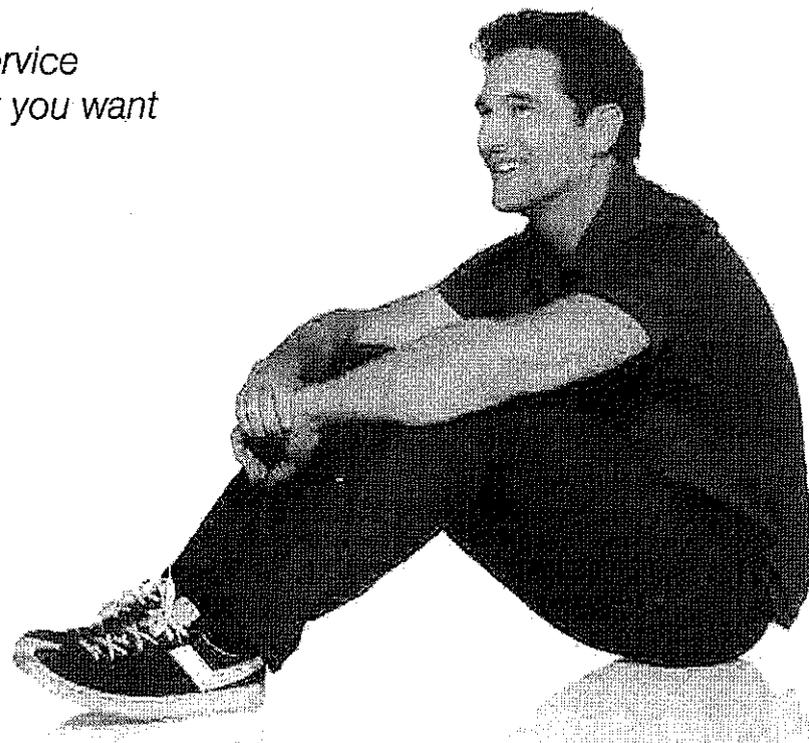


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11 days to be a Sprint Business Customer.

Sign up as a Sprint corporate-liable business customer, and get access to support and rewards to help your business succeed.

Discounts for Small Business

Enroll in Sprint® Equipt for Business and save up to 8% on eligible services. Receive a 5% discount with 5-24 active corporate-liable units, or an 8% discount with 25-99 active corporate-liable units on eligible services.

Instant Savings on Devices

Buy or upgrade your devices without waiting for a mail-in rebate. Even small businesses get the best price offered to our largest business customers with Business Device Select pricing on popular selected devices.

Government and Corporate Customer Discounts

Ask a sales representative about volume discounts for government and corporate customers and employees.

All benefits are not available to all customers. Additional restrictions apply.



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From just talk to Simply Everything,SM
we've got the perfect plan for you.

All plans include at no additional charge:

- Unlimited Night and Weekend Calling with Nights starting at 7 PM
- Nationwide Long Distance and No Roaming Charges
- Unlimited Sprint[®] Mobile to Mobile

Individual plans \$69.99 and higher are eligible for special perks and rewards with Sprint Premier.



****Taxes and Sprint surcharges excluded. See page 26 for important details.**

Plan details: Additional Anytime Minutes for 450-minute plans: 45c/min. Additional Anytime Minutes for 900-minute plans: 40c/min. Existing customers can switch to any of these plans without a contract extension. Available on new lines of activation with a two year agreement per line. Unlimited Night Calling starting at 6 PM is an additional \$5/mo. per line. Nextel Direct Connect[®] and Group Connect[®] is an additional \$10/mo. per line on Talk Plans. PowerSource[™] phones require Nextel Direct Connect and Group Connect Services. All plans include Caller ID, Voicemail, Call Waiting, Numeric Paging, Three-Way calling, and Call Forwarding (20c/min.) while on the Nationwide Sprint Network or the Nextel National Network. No plan discounts apply with the Simply EverythingSM Plan. Some phones require activation of select voice plans with included data. Windows Mobile/Palm/BlackBerry[®] devices require activation on an Everything plan with data or a Talk plan with a separate data plan. Coverage in U.S. and limited international use on the Sprint Network. **Simply EverythingSM** includes: Web 2.0, Gmail, Windows Live Hotmail[®], AOL and more with Sprint Mobile Email and BlackBerry[®] Internet Service (BIS). Also includes Sprint Mobile Email-Work, Microsoft Direct Push technology via ActiveSync[™] and VersaMail. BlackBerry Enterprise Server (BES) can be added for an additional \$20/mo. per line, or Worldwide data plans can be added for PDA or BlackBerry Sprint phones for \$40/mo. per line when added to an EverythingSM Plan with data. **Sprint[®] Mobile in Motion:** Access when to drive or receive calls directly as you drive Sprint subscriptions on the Nationwide Sprint Network or the Nextel National Network without using your 997408 plan minutes. **GPS Navigation:** Unlimited GPS Navigation includes: RealView GPS Navigation[™] for Nextel phones, Sprint Navigation for Sprint or PowerSource[™] phones. **Data:** Includes premium content. Email, social media, TV and Sports content may be subject to charges. **Sprint Premier:** Offer restrictions apply, see page 26 for details. All services not available in all markets. Coverage not available everywhere. For more information see www.sprint.com or call 1-800-451-4747.

Individual Plans

Simply Everything Plan (Unlimited Talk, Messaging, Direct Connect, Group Connect, and Data)	
Monthly Anytime Minutes Unlimited	Price per month** \$99.99

Unlimited Messaging includes:
 Text, Pictures, Video

Unlimited Data includes:
 Web, GPS Navigation, Sprint TV Premier, Sprint Music Premier and Email for your phone, FDA or BlackBerry* (BlackBerry Enterprise Server) (BES) can be added for an additional \$20/mo. per line.

Talk Plan	
Monthly Anytime Minutes	Price per month**
450	\$39.99
900	\$59.99

Everything Messaging Plan (Unlimited Messaging, Direct Connect and Group Connect)	
Price per month**	Price per month**
\$49.99	\$69.99
\$69.99	\$89.99

Everything Data Plan (Unlimited Messaging, Direct Connect, Group Connect and Data)	
Price per month**	Price per month**
\$49.99	\$69.99
\$69.99	\$89.99

Everything's better when shared with friends, family or co-workers.
 Ideal for families and businesses with up to 5 lines.

All plans include at no additional charge:

- Unlimited Night and Weekend Calling with Nights starting at 7 PM
- Nationwide Long Distance and No Roaming Charges
- Unlimited Sprint Mobile to Mobile

Share plans \$99.99 and higher are eligible for special perks and rewards with Sprint Premier.

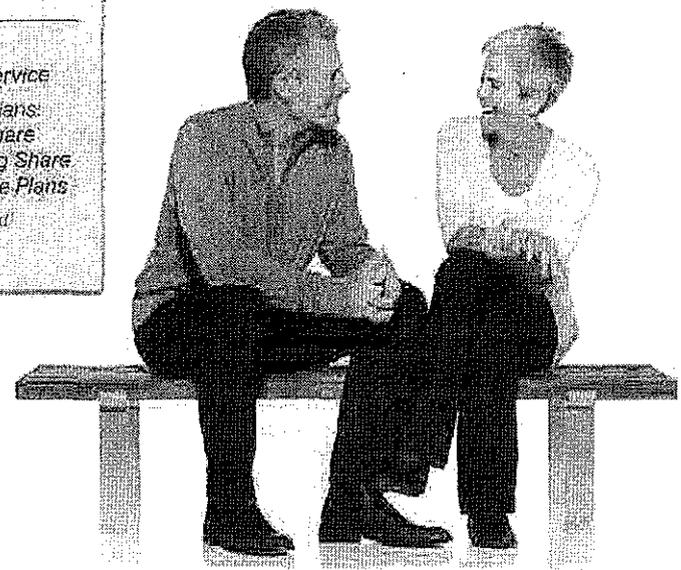
Save
\$5/month

when you add Nextel Direct ConnectSM to a new line of service

Available on the following plans:
 Talk Individual Plans, Talk Share Plans, Everything Messaging Share Plans, Everything Data Share Plans

Includes Nextel Direct ConnectSM and Group ConnectSM

Original price \$10/mo. per line.



**Taxes and Sprint surcharges excluded. See page 26 for important details.

Plan details: Additional Anytime Minutes for 700-minute plans: 45¢/min. Additional Anytime Minutes for 1500-minute plans: 40¢/min. Additional Anytime Minutes for 3000-minute plans: 25¢/min. Existing customers can switch to any of these plans without a contract reversion. Available on new lines of activation with a two-year agreement per line. Unlimited Night Calling starting at 8 PM is an additional \$1/line per month. Nextel Direct ConnectSM and Group ConnectSM is an additional \$10/mo. per line. PowerShareSM phones require Nextel Direct Connect and Group Connect Services. All plans include Caller ID, Voicemail, Call Waiting, Numeric Paging, Three-Way calling, and Call Forwarding (20¢/min.) while on the Nationwide Sprint Network or the local National Network. No plan discounts apply with the Simply EverythingSM Share Plan. Invoice will show Simply Everything \$99.99 for one per line and Simply Everything \$99.99 for each additional line. Some charges require activation on select mobile phones with keypad dial, Windows Mobile, Palm OS, or Java. Coverage on an Everything Data Share plan, Simply Everything Share plan or Talk Share plan will incur separate charges per minute. Coverage on Group Connect plans must be on the same network. Includes: Wireless Internet, Email, Windows Live, HomeLink, AOL, and more with Sprint Mobile Email and BlackBerrySM Internet Service (GIS). Also includes Sprint Mobile Email, Work, Messages, Direct Rich Messaging via ActiveSyncSM and VerizonSM BlackBerrySM Exchange Server (SES) can be added for an additional \$20/mo. per line. Worldwide data plans can be added to HPA or BlackBerry Sprint phones for \$40/mo. per line when added to an Everything Share plan with data. **SprintSM Mobile to Mobile:** Allows you to make or receive calls directly to or from Sprint subscribers on the Nationwide Sprint Network or the Nextel National Network without using your service plan minutes. **GPS Navigation:** Unlimited GPS Navigation includes: RealView GPS NavigationSM for Nextel phones, Sprint Navigation for Sprint or PowerShareSM phones. **Data:** Services are subject to content, email capabilities, TV and Radio channel line are subject to change. **Sprint Premier:** Check restrictions and see page 26 for details. All features not available in all areas. Coverage not available everywhere. For more information see www.sprint.com or call 1-800-4A-SPRINT for details.

Share Plans

Simply Everything Share Plan <small>(Unlimited Talk, Messaging, Direct Connect, Group Connect and Data)</small>	
Monthly Anytime Minutes to share between two lines**	Price per month for two lines**
Unlimited <small>(Unlimited Talk, Messaging, Direct Connect, Group Connect and Data)</small>	\$189.99 \$89.99/mo. per line

Unlimited Messaging includes:
Text, Picture, Video

Unlimited Data Includes:
Web, GPS, Navigation, Sprint TV, Premier, Sprint Music Premier and Email for your phone, PDA or BlackBerry
BlackBerry Enterprise Server (BES) can be added for an additional \$20/mo. per line

	TalkShare Plan	Everything Messaging Share Plan <small>(Unlimited Messaging)</small>	Everything Data Share Plan <small>(Unlimited Messaging and Data)</small>
Monthly Anytime Minutes to share between two lines**	Price per month for two lines**	Price per month for two lines**	Price per month for two lines**
700	\$69.99		
1500	-	\$99.99	\$129.99
3000	-	\$149.99	\$169.99
Annual Price (lines x 12)	\$9.99/mo. per line	\$8.99/mo. per line	\$13.99/mo. per line

Bring your business an edge.

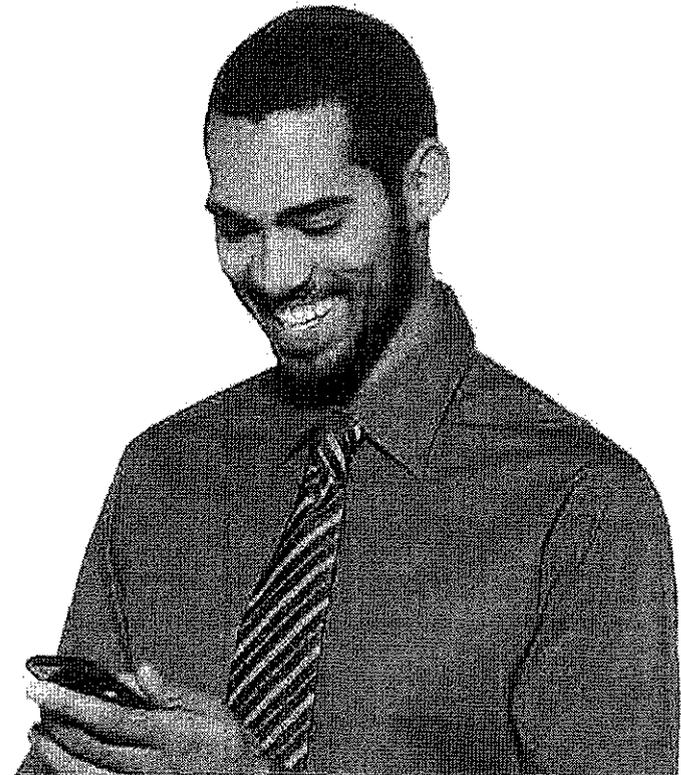
Get the plan you need to stay productive and ahead of the competition. Ideal for businesses with a workforce of 5 or more.

All plans include at no additional charge:

- Pooling of minutes
- Unlimited Nextel Direct Connect and Group Connect
- Unlimited Sprint Mobile to Mobile
- Unlimited Night and Weekend Calling with Nights starting at 7 PM
- Nationwide Long Distance and No Roaming Charges

****Taxes and Sprint surcharges excluded. See page 26 for important details.**

Plans only available to Corporate-liable business subscribers. **Plan details:** Additional Anytime Minutes: 25¢/min. Existing customers can switch to any of these plans without a contract extension. Available on new lines of activation with a one-year agreement per line. All plans include Caller ID, Voicemail, Call Waiting, Numeric Paging, Three-Way calling, and Call Forwarding (20¢/min.) while on the Nationwide Sprint Network or the Nextel National Network. Some phones require activation on select voice plans with included data. Windows Mobile/Palm/BlackBerry® devices require activation on Sprint Business Advantage Messaging and Data plan or Sprint Business Advantage Talk plan with a separate data plan. Currently, all Group Connect users must be on the same network. **Email:** Email includes Yahoo! Mail, Gmail, Windows Live Hotmail® AOL, and more with Sprint Mobile Email and BlackBerry® Internet Service (BIS). Also includes Sprint Mobile Email-Work, Microsoft Direct Push technology via ActiveSync™ and Versamail. BlackBerry Enterprise Server (BES) can be added for an additional \$20/mo. per line, or Worldwide data plans can be added for PDA or BlackBerry Sprint phones for \$40/mo. per line when added to a Sprint Business Advantage Messaging and Data plan. **Pooling:** Only voice minutes can be pooled across Sprint Business Advantage plans: Talk, Messaging and Messaging and Data. Anytime minutes will be applied to the line they are attached to first, and then allocated (pooled) to other Sprint Business Advantage subscribers on the same account as needed. **Sprint® Mobile to Mobile:** Allows you to make or receive calls directly to or from Sprint subscribers on the Nationwide Sprint Network or the Nextel National Network without using your service plan minutes. **GPS Navigation:** Unlimited GPS Navigation includes: TeleNav GPS Navigator™ for Nextel phones, Sprint Navigation for Sprint or PowerSource™ phones. **Data:** Excludes premium content, Email applications, TV and Radio channel line-up are subject to change. All features not available on all phones. Coverage not available everywhere. For more information see www.sprint.com or other in-store materials for details.



Business Plans

Sprint Business Advantage <small>Low minutes across Sprint Business Advantage subscribers on the same discount.</small>	Sprint Business Advantage Talk <small>(Unlimited Direct Connect and Group Connect)</small>	Sprint Business Advantage Messaging <small>(Unlimited Messaging, Direct Connect and Group Connect)</small>	Sprint Business Advantage Messaging and Data <small>(Unlimited Messaging, Direct Connect, Group Connect and Data)</small>	Unlimited Messaging Includes: Text, Picture, Video Unlimited Data includes: Web, GPS Navigation, Sprint TV™ Premier, Sprint® Music Premier and Email for your phone, PDA or BlackBerry®
Monthly Anytime Minutes	Price per month**	Price per month**	Price per month**	
200	\$29.99	\$39.99	\$59.99	
450	\$39.99	\$49.99	\$69.99	
900	\$59.99	\$69.99	\$89.99	
1350	\$79.99	\$89.99	\$109.99	
2000	\$99.99	\$109.99	\$129.99	
4000	\$149.99	\$159.99	\$179.99	<small>BlackBerry Enterprise Server (BES) can be added for an additional \$29/mo. per line.</small>

Get the job done with the best. At a better price.

Connect instantly with unlimited work group communications.

All plans include at no additional charge:

- *Unlimited Nextel Direct Connect and Group Connect*
- *Unlimited Sprint Mobile to Mobile*
- *Unlimited Messaging (Text, Picture, Video)*
- *Unlimited Night and Weekend Calling with Nights starting at 9 PM*
- *Nationwide Long Distance and No Roaming Charges*

****Taxes and Sprint surcharges excluded. See page 26 for important details.**

Plan details: Additional Anytime Minutes: 25¢/min. Existing customers can switch to any of these plans without a contract extension. Available on new lines of activation with a two-year agreement per line. All plans include Caller ID, Voicemail, Call Waiting, Numeric Paging, Three-Way calling, and Call Forwarding (20¢/min.) while on the Nationwide Sprint Network or the Nextel National Network. Some phones require activation on select voice plans with included data. Currently, all Group Connect users must be on the same network. **Web:** Unlimited Web includes unlimited data access. Email with Sprint Mobile Email, Web surfing, Basic Music with 99¢ downloads and Basic TV with select channels and Sprint Exclusive Entertainment. **GPS Navigation:** Unlimited GPS Navigation includes: TeleNav GPS Navigator™ for Nextel phones, Sprint Navigation for Sprint or PowerSource™ phones. **Pooling:** Only voice minutes can be pooled across Nextel Direct Connect Custom plans. Anytime minutes will be applied to the line they are attached to first, and then allocated (pooled) to other Nextel Direct Connect Custom plan subscribers on the same account as needed. **Sprint® Mobile to Mobile:** Allows you to make or receive calls directly to or from Sprint subscribers on the Nationwide Sprint Network or the Nextel National Network without using your service plan minutes. **Data:** Excludes premium content. Email applications, TV and Radio channel line-up are subject to change. All features not available on all phones. Coverage not available everywhere. For more information see www.sprint.com or other in-store materials for details.



Nextel Direct Connect[®] Custom Plans

<i>Unlimited Work Group Communications</i> <small>Includes unlimited communications to your work group.</small>	<i>Unlimited Work Group Communications + Web and Navigation</i> <small>Includes unlimited communications to your work group, GPS Navigation and unlimited Web.</small>
<i>Price per month**</i>	<i>Price per month**</i>
<p align="center">\$29.99</p> <p align="center"><small>(Nextel Direct Connect BlackBerry[®] devices require an additional BlackBerry data plan)</small></p>	<p align="center">\$39.99</p> <p align="center"><small>(for Nextel phones only)</small></p>
<p align="center">\$49.99</p> <p align="center"><small>(for PowerSource[™] and Nextel Direct Connect capable Sprint phones)</small></p>	
<p align="center"><i>Add Anytime Minutes to Your Plan:</i></p>	
<p align="center">500 Anytime Minutes: \$30/mo.</p>	
<p align="center">2500 Anytime Minutes: \$100/mo.</p>	
<p align="center"><small>*Anytime Minutes are available to all Nextel Direct Connect Custom Plan subscribers on the same account.</small></p>	

Combine the convenience of Simply Everything
with the mobility of Mobile Broadband.

Get unlimited voice, messaging and data for your phone
plus wireless Internet on the go.

\$149.⁹⁹ /month**

**Simply Everything¹ Plan
+ Mobile Broadband**

Add mobile broadband to your
existing Simply Everything plan
for only \$50/mo.

**Taxes and Sprint surcharges excluded. See page 26 for important details.

Requires two lines of service: \$99.99 Simply Everything Plan + \$50.00 Connection Plan. No more than one discounted Connection Plan allowed per line of service on Simply Everything or Simply Everything Share. No additional discounts apply on the Simply Everything Plan + Mobile Broadband Plan. Additional Data above 5GB: \$0.05/MB. Off network roaming limited to 300MB/mo. Data usage without a Mobile Broadband Plan is 3¢/KB. International Data roaming may incur additional charges. Coverage and Pay-As-You-Go rates are subject to change. See page 4 for details on Simply Everything plan.



Data Plans

Mobile Broadband Plans <i>Wirelessly access the Internet nationwide.</i>	
Monthly Data Allowance	Price per month**
5GB	\$59.99 with two-year agreement. <i>No discounts apply</i>
	\$79.99 with one-year agreement

What can you do with 5GB a month?		
	Approximate Size	5GB
Email (no attachment)	3KB	1,666,667
Web page look-up	150KB	33,333
Low resolution picture	500KB	10,000
PowerPoint presentation	3MB	1,667
Music (3-minute song)	3MB	1,667
YouTube video (3 minutes)	15MB	333

Data Conversion Chart

1024KB = 1MB

1024MB = 1GB

Sizes estimated and may vary.

See www.sprint.com for more information on what you can do with 5GB a month.

**Taxes and Sprint surcharges excluded. See page 26 for important details.

Additional Data above 5GB: \$0.05/MB. Off network roaming limited to 300MB/mo. Data usage without a Mobile Broadband Plan is 3¢/KB. International Data roaming may incur additional charges. Overage and Pay-As-You-Go rates are subject to change.

Worldwide BlackBerry® Plan Unlimited Data Access
 Access BlackBerry Enterprise Server and BlackBerry Internet Services worldwide.

Monthly Data Allowance	Price per month**
For BlackBerry World phones: Unlimited GSM/GPRS and CDMA data in over 129 countries worldwide.	\$69.99 with one-year agreement
For all other Sprint BlackBerry devices: Unlimited CDMA data in USA, Canada, Mexico and more.	\$69.99 with one-year agreement

Worldwide Data Plan
 Get international access to wireless data when you need it.

Monthly Data Allowance	Price per month**
For World phones: Unlimited GSM/GPRS and CDMA data in over 129 countries worldwide.	\$69.99 with one-year agreement
For all other Sprint Windows Mobile/Palm PDA devices: Unlimited CDMA data in USA, Canada, Mexico and more.	\$69.99 with one-year agreement

Data Add-ons

Get a plan packed with more of what you want.

Data Packs For Sprint and PowerSource devices only

Basic Music Enjoy streaming radio channels and 99¢ wireless music downloads. For full Sprint Radio line-up, visit www.sprint.com/radio.

Basic TV Watch shows, sports, news, movies and more. Choose from exclusive content, short clips or full-length episodes. For full Sprint TV line-up, visit www.sprint.com/tvguide.

Web & Email Unlimited Web browsing, Sprint Mobile Email, news and more.

\$15/mo.

Data Premier For any Sprint device

Sprint® Music Premier More radio channels, local stations from across the country and full-length music videos. For full Sprint Radio line-up, visit www.sprint.com/radio.

Sprint TV® Premier Watch even more shows, sports, news and movies. Choose from exclusive content, short clips or full-length episodes. For full Sprint TV line-up, visit www.sprint.com/tvguide.

Unlimited Navigation Unlimited driving directions for GPS-capable phones via Sprint Navigator.

Additional
\$10/mo.

**Taxes and Sprint surcharges excluded. See page 26 for important details.

Excludes premium content. Email applications, TV and Radio channel line-up are subject to change. All features not available on all phones. For more information see www.sprint.com or other in-store materials for details. Data usage without a data pack or plan that includes data is 3¢/KB. International Data roaming may incur additional charges. Pay-As-You-Go rates subject to change.

Pro Pack and BlackBerry® Personal Pack For BlackBerry® and Windows®/Palm PDA, Sprint services

Email Enjoy the freedom and flexibility to check your email on your phone. PDA or BlackBerry. Includes Yahoo! Mail, Gmail, Windows Live Mail™, AOL and more with Sprint Mobile Email and BlackBerry® Internet Service (BIS). Also includes Sprint Mobile Email@Work, Microsoft Direct Push Technology™ and Volsamail.

Unlimited Messages Text, Picture and Video.

Unlimited Navigation Unlimited driving directions via Sprint Navigation.

Web Browse weather, news and more. Plus, get exclusive content like NFL Mobile Live and NASCAR Sprint Cup Mobile.

Basic TV Watch shows, sports, news, movies and more. Choose from exclusive content, short clips or full-length episodes. For full Sprint TV line-up, visit www.sprint.com/tvguide.

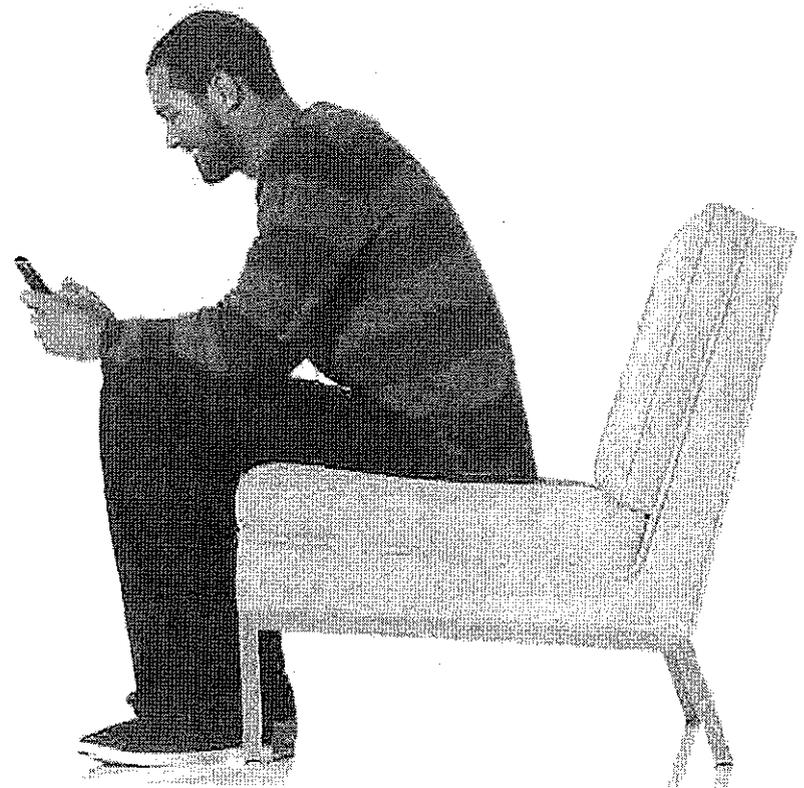
Basic Music Enjoy streaming radio channels and 99c wireless music downloads. For full Sprint Radio line-up, visit www.sprint.com/tradio.

\$30/mo.

Messaging Add-ons

Share life through text, picture and video messaging.

Unlimited Messages	\$20/mo.
1000 Messages	\$10/mo.
300 Messages	\$5/mo.



****Taxes and Sprint surcharges excluded. See page 26 for important details.**

Messaging: For domestic messages sent or received. Additional messages & Pay-As-You-Go messages are 20¢/msg. Pay-As-You-Go MMS-images/Audio messages for Nextel phones are 25¢/msg. International messages for Sprint phones are 20¢/msg. SMS Voice messages may incur an additional data charge of 3¢/KB. Not available with all phones. All charges are for messages sent or received. **Sprint Family Locator:** Not available to corporate-liable subscribers.

GPS Add-ons [requires a Data Pack]

Get directions, always know where your people are and find what you need.

GPS Navigation Get driving directions and see your progress on a moving map with spoken turn-by-turn driving directions on your GPS-capable phone with Sprint Navigation for Sprint phones or TeleNav GPS Navigator™ for Nextel phones. Sprint Navigation has pay-as-you-go plans at \$2.99/day. No discounts apply.

\$10/mo.

Sprint Family Locator Locate your child quickly and easily, anytime, day or night. Display your child's location within a map on your PC or mobile phone (select devices). Service includes locating up to four phones. Pay-as-you-go text messaging rates may apply. To sign up now for more details, go to www.sprint.com/familylocator.

\$5/mo.

Sprint Mobile Locator Increase productivity and efficiency by locating employees in the field, sending employees driving directions and text messages and notifying customers of arrival times.

\$14.99/mo.

Voice Service Add-ons

Talk night or day, near or far away.

Sprint 411 Directory Assistance More than just phone numbers, a live operator can help you with a variety of information services such as movie listings, or use precision location services to provide you with turn-by-turn driving directions to your desired location. You can receive up to three phone numbers or pieces of information per call, and be automatically connected at no additional charge.

\$1.79 per call
(airtime charges apply)

Sprint International Long Distance Use your service plan minutes and save on international calls made from the U.S.

Make international calls for personal, international and other wireless services. For additional information, visit www.sprint.com/international.

\$4/mo.

Mexico Long Distance Call landlines in select Mexican border cities from the U.S. for 27¢/min. See page 27 for available dial codes. Plus, call any other city in Mexico from the U.S. for just 5¢/min.

Make international calls with Sprint. For additional information, visit www.sprint.com/international.

\$5/mo.

Sprint to Home Make and receive calls between your wireless phone and home phone without using your wireless service plan minutes.

\$5/mo.

Mobile to Office™ Make and receive calls between your wireless phone and office phone without using your wireless service plan minutes.

\$8/mo.

*Taxes and Sprint surcharges excluded. See page 26 for important details.
†Not available in certain states.

Additional Voice Plans

<p>Sprint Basic Plan (200 Anytime Minutes): Additional minutes are 45¢/min. Includes Unlimited Night and Weekends with Nights starting at 9 PM, Nationwide Long Distance and No Roaming Charges. Requires a two-year agreement. No plan discounts apply.</p>	<p>\$29.99/mo.**</p>
<p>Month-to-Month Plan (200 Anytime Minutes): Additional minutes are 45¢/min, roaming minutes are 98¢/min, plus 25¢/min. roaming long distance. Includes Unlimited Night and Weekends with Nights starting at 9 PM and Nationwide Long Distance. No Roaming Charges may be added to this option for an additional \$9/mo. No plan discounts apply. For Sprint phones only.</p>	<p>\$39.99/mo.**</p>
<p>Sprint Basic and Month-to-Month Plan Add-ons:</p>	
<p>Unlimited Sprint Mobile to Mobile</p>	<p>\$5/mo. per line</p>
<p>Unlimited Night Calling Starting at 7 PM</p>	<p>\$5/mo. per line</p>
<p>Unlimited Night Calling Starting at 6 PM</p>	<p>\$10/mo. per line</p>
<p>Direct Connect[®] and Group Connect[®] Limited time offer—Nextel Direct Connect and Group Connect only \$5/mo. per line when added to a new line of service.</p>	<p>\$10/mo. per line</p>

Nextel Direct Connect® Add-ons

Must-haves for those who connect with the push of a button.

Web Plan Add to your voice plan and get access to top wireless internet sites for news, weather, sports, entertainment, travel and more.	\$5/mo.	NextMail™ Send a voice message to up to 50 email addresses at once with a push of the Direct Connect button. Recipients do not have to be Sprint Nextel customers. May not be available with all Direct Connect-capable devices.	\$7.50/mo.
My Nextel Address Book Store and manage your contacts online and access them from your phone.	\$5/mo.	NextMail Locator Enjoy all the benefits of NextMail plus the ability to send your location information and even photos along with NextMail voice messages. May not be available with all Direct Connect-capable devices.	\$19.99/mo.
Unlimited International Direct Connect™ (For Nextel phones and PowerSource™ phones) Connect in under a second with other Nextel subscribers in Canada, Mexico, Peru, Argentina, Chile and Brazil. International Direct Connect usage also uses any local or Nationwide Nextel Direct Connect minutes in your plan. Pay-As-You-Go International Direct Connect is 20¢/min, per participant.	\$10/mo.		

**Taxes and Sprint surcharges excluded. See page 26 for important details.

No discounts apply to Web Plan, My Nextel Address Book, NextMail or NextMail Locator.

Protection Services

The protection you need so you can be worry-free.

Total Equipment Protection Should something ever happen to your phone, you'll have a worry-free way to ensure that you get the phone you want again. Coverage includes loss, theft, physical or liquid damage as well as mechanical or electrical failure due to defect, abnormal wear and tear, and routine maintenance.

To enroll, call 1-800-384-3686 or go to your local Sprint store within 30 days of a new phone activation or upgrade. For complete details, see the Protection brochure or visit www.sprint.com/TEP. No discounts apply.

\$7/mo.
per device

Spending Limit Program

When you participate in the Spending Limit Program, your account has a preset account spending limit. Your spending limit is the maximum balance your account can reach at any given time. You can choose your phone, service plan and one of several ways to pay your bill.



Payment options depend upon credit and payment history. Certain payment options may be restricted or not available. Account Balance Monitor may not be compatible with all devices and may incur casual data usage charges of 3¢/KB without a data plan. Text messages available when the phone is on and you are in a Sprint Service Area. See page 26 for additional device and reconnection fee details.

How it Works:

You have a preset account limit based on your credit history. Your limit pertains to all lines on your account and total balance. Talk, text, download and more, plus monitor your account and pay your bill with the following tools.

- Download the Account Balance Monitor to your phone to check your limit. Just access the web on your phone, keyword search ABM, click the link and then click "Get it now."
- Manage your account on the web by going to www.sprint.com and signing into My Account
- Receive free text messages from Sprint when your account approaches your preset limit and when you have reached your preset limit.
- Dial *4 (or *5 for Spanish) to check minutes or *2 to check usage, balance or find the nearest store. Dial *3 to make a payment.

After 18 months of service and responsible payment, Sprint may remove your spending limit and send an account notification letter. If the limit on your account is exceeded, service may be suspended until the amount over your limit is paid and posted to your account. If your account remains suspended, Sprint may terminate your service.

FULL LEGAL DISCLAIMER:

9PM: 9PM-7AM Mon.-Thurs., 9PM Fri.-7AM Mon.

7PM: 7PM-7AM Mon.-Thurs., 7PM Fri.-7AM Mon.

6PM: 6PM-7AM Mon.-Thurs., 6PM Fri.-7AM Mon.

****Monthly charges exclude taxes and Sprint Surcharges (incl. USF charge of up to 12.9% (varies quarterly), Administrative Charge (up to \$1.99/line/mo.), Regulatory Charge (\$0.20/line/mo.) & state/local fees by area). Sprint Surcharges are not taxes or gov't-required charges and are subject to change. Details: www.sprint.com/taxesandfees.**

TERMS OF SERVICE

Subscriber Agreement: The agreement is provided to you at activation and includes any documents you are asked to sign, the detailed service terms (in this guide & other relevant materials) and a specific Terms and Conditions document for the services selected. **General Terms:** If you agree to maintain service for a minimum Term, the Term begins when you accept the Subscriber Agreement (e.g., signature, activate service, use phone, etc.). You may terminate any line of service before its Term ends by calling us, however, you will be responsible for an EARLY TERMINATION FEE of up to \$200 ("ETF") for each line/number terminated early — except for terminations consistent with our return policy. Subscriber Agreements starting after 11/02/08 are subject to Sprint's prorated policy (\$200 through month 5 of term, decreasing \$10 a month until \$50 minimum applies to remaining terms). Payment of the ETF does not satisfy other obligations owed to us, including Term commitments with other lines or service/equipment charges. All offers, including plans and customizable/upgrade options are available from **09/08/2009 to 10/31/2009** — we reserve the right to cancel offers early or extend offers without notice. Offers are subject to credit approval. An account spending limit may apply — ask for specific amount. In certain areas, a \$4.99 per month account spending limit fee will apply per line. Monthly service plan charges accrue even if your service is turned off for exceeding your spending limit or non-payment. Offers may not be available everywhere, combinable with other promotions/options, or available to business customers. Coverage is not available everywhere and varies by service — see mapping brochures or visit www.sprint.com/coverage for details. Monthly charges exclude taxes, Sprint Surcharges (incl. USF charge (varies quarterly), cost recovery and administrative fees, & state/local fees by area (e.g., in some areas up to 16% but in most areas less than 3%)). Sprint Surcharges are not taxes or gov't-required charges and are subject to change. Up to a \$36 phone activation fee applies to new activations, certain service plan changes or upgrades of phones or devices ("phones"). A \$25 reconnect fee may apply to reestablish service on all accounts that have been disconnected for nonpayment. A deposit, in most instances between \$50 and \$750 (but sometimes up to \$1000), may be required per line to establish service. Our services will only work with our phones — not all services are available with all phones or on all networks. Monthly service charges are not refunded or prorated if service is terminated or modified before your billing cycle ends. All phone usage, including incoming/outgoing calls, incurs charges unless specified otherwise. Except where specified, included plan minutes are not good for all-network roaming calls. International roaming rates for voice and data services are additional and will vary. On calls that cross time periods, minutes are generally deducted or charged based on the call start time. Unused monthly plan minutes do not carry forward. Partial minutes of use are rounded up to the next whole minute.

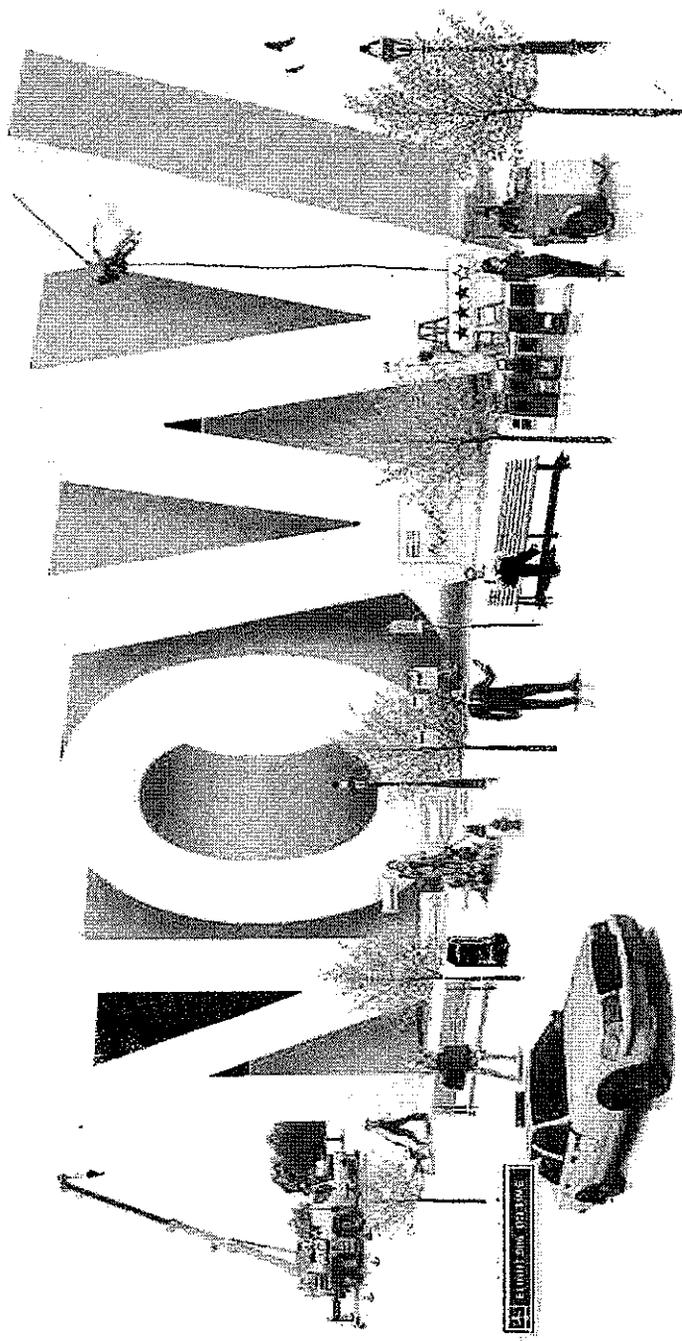
PROMOTIONS, OPTIONS AND OTHER PROVISIONS

Business Device Select and Sprint Business Premier Programs available to corporate-liable accounts only. Sprint Premier is not available to corporate-liable customers. **Messaging (text, picture and video):** Messaging rates are subject to change. Standard message rates are charged when a message is sent or received, whether read or unread, viewed or unviewed, solicited or unsolicited. Unused monthly plan messages do not carry forward. Certain messages, including those to 3rd parties to participate in a promotion or other program, will result in additional charges. International messaging rates may vary and are subject to change. There is no guarantee that messages will be received, and we are not responsible for lost or misdirected messages. Most text messages are limited to 160 characters. Messages may incur an additional Pay-As-You-Go data charge of 3¢/KB. **Music:** \$2.50/song charge applies to Sprint Music Store downloads if no data plan is selected. **Sprint Mobile to Mobile:** Sprint Mobile to Mobile allows you to make or receive unlimited calls directly to or from

Sprint subscribers on the Nationwide Sprint Network or the Nextel National Network without using your service plan minutes. Only available for calls directly between Sprint phones and/or most Nextel phones (not through Voicemail, 411 or other indirect methods). Not available where a Sprint phone is roaming. **GPS Navigation:** Environment may limit GPS location information. Requires Account holder's authorization for Sprint to share location and other needed enabling information with third parties. It is the responsibility of the Account holder to notify device users that location can be identified while using GPS applications. **Location Based Services:** Sprint Mobile Locator available for corporate-liable accounts only. Environment may limit location based service information. Location Based Services require an account holder's authorization for Sprint to share location and other needed enabling information with third parties. It is the responsibility of the account holder to notify device users that location can be identified while using location based service applications. **Total Equipment Protection:** Equipment Replacement Program is insurance underwritten by Continental Casualty Company, a CNA company (CNA) and administered by Asurion Protection Services, LLC, a licensed agent of CNA (Asurion Protection Services Insurance Agency). Please see the Protection brochure available at any participating retail location or visit www.sprint.com/TEP for complete terms and conditions of coverage. Terms and conditions are subject to change. May not be available in all states. Eligibility varies by device. **Sprint to Home:** Monthly charge is invoiced to Sprint wireless account. Not available for corporate-liable accounts. **Mobile to Office:** Monthly charge is invoiced to Sprint wireless account. Available only for corporate-liable accounts. **Add-a-Phone:** Requires a minimum two-year Term agreement for each line added ("Secondary Line"). The first phone activated on the service plan ("Primary Line") and Secondary Lines may have different Term end dates. If the Primary Line on the account is terminated prior to the expiration of the Term of any Secondary Line, a Secondary Line will become the Primary Line. **Email:** Wireless access to corporate/employee email may require add'l server or server access, licenses, or additional requirements which incur add'l charges. **Data:** Services are not available with all Sprint phones. Usage is calculated on a per kilobyte, megabyte or gigabyte (depending on your plan) basis and is rounded up to the next whole kilobyte, megabyte or gigabyte. Rounding occurs at the end of each session or each clock hour and, at which time we deduct accumulated usage from your plan, or assess overage or casual usage charges. You are responsible for all data activity from and to your device, regardless of who initiates the activity. Estimates of data usage will vary from actual use. Your invoice will not separately identify the number of kilobytes, megabytes or gigabytes attributable to your use of specific sites, sessions or services used. Premium content (games, ringtones, songs, etc.) priced separately. Services are not available for use in connection with server devices or host computer applications, other systems that drive continuous heavy traffic or data sessions, or as substitutes for private lines or frame relay connections. Except with Phone-as-Modem plans, you may not use a phone (including a Bluetooth phone) as a modem in connection with a computer, PDA, or similar device. We reserve the right to deny or terminate service without notice for any misuse or any use that adversely affects network performance. Availability of downloadable or streaming content is subject to change, including but not limited to television channels and radio stations. If user is not subscribed to a data included plan or add-on, pay-as-you-go charges are incurred when using data applications and services. **Web Access:** Sprint can help you prevent the transmission of material harmful to minors on certain devices by allowing access only to a limited number of Internet websites or restricting web access. For more information, visit www.sprint.com. **Off-network Roaming on Sprint Phones:** Not available with single-band phones, or to customers residing outside an area covered by the Nationwide Sprint Network. Sprint may terminate service if in a given month (1) more than 800 minutes, (2) a majority of minutes or (3) a majority of data kilobytes are used while roaming. International calling, including in Canada and Mexico, is not included in plans with no roaming charges. Roaming usage may be invoiced after 30-60 days. Data services and certain calling features (Voicemail,

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Caller ID, Call Waiting, etc.) may not be available in all roaming areas. **Data Usage Limitation (Mobile Broadband Cards, USB Modems, Embedded Modems and Phone-as-Modem):** The amount of data transmitted over our network is measured in kilobytes (KB), megabytes (MB) or gigabytes (GB). Sprint reserves the right to limit throughput speeds or amount of data transferred; and to deny, terminate, disconnect or suspend service if usage either exceeds (a) 5GB/month in total, unless specified otherwise or (b) 300MB/month while off-network roaming. 1024KB equal 1MB. 1024MB equal 1GB. **International Long Distance:** Phones must be activated for international service in order to make international long-distance calls, including calls to Mexico. For verification purposes, you may be required to provide additional information and activation of plan may take approximately 1 to 3 days. Rates, mobile termination fees, and available countries at www.sprint.com/internationalrates. International rates are subject to change without notice. **Mexico Long Distance Dial Codes:** Agua Prieta (633), Altar (637), Ciudad Acuña (877), Ciudad Juárez (656), Ensenada (646), Matamoros (868), Mexicali (686), Naco (633), Nogales (631), Nuevo Laredo (867), Ojinaga (626), Piedras Negras (878), Puerto Palomas (656), Raynosa (899), Rosarito (661), San Luis Río Colorado (653), Soncota (651), Tecate (665), & Tijuana (664). **Nextel Direct Connect:** Customer must select rate plan or add-on with Nextel Direct Connect access in order to make or receive Direct Connect calls. Nextel and PowerSource devices operate on the Nextel National Network and Sprint devices operate within certain EVDO Rev-A coverage areas on the Sprint Mobile Broadband Network. **Group Connect:** Group Connect currently operates between parties on the same push-to-talk network platform. **International Direct Connect:** **Access:** International Direct Connect calls use Direct Connect minutes included in your plan. (20¢/min.) times # of participants pay-as-you-go charge for services not included in your rate plan or option. International Direct Connect access available in and between the U.S. and Canada, Mexico, Brazil, Peru, Chile and Argentina. **One Way Messaging Alerts:** Alerts are 15¢ per message received by the customer. Only available on Nextel and PowerSource phones. One-Way Messaging alerts are subject to change. **NextMail/NextMail Locator:** Recording outside the U.S. will incur International Direct Connect charges. NextMail/NextMail Locator is only available on select Nextel Direct Connect-capable phones. GPS services require GPS capable phone. Environment may limit GPS location info. Standard messaging or data rates may apply for sending photos along with NextMail Locator messages.



*The. It's now
above the horizon.*

*As a Sprint customer, you get more
of what you want out of every moment
of your life. Whether it's business
productivity or life outside the office,
we enable you to do more, get more
and enjoy more.*



*Call 800-Sprint-1
Click www.sprint.com
Go to the nearest Sprint Store*



Mixed Sources
Product group from well-managed
forests, controlled sources and
recycled wood or fiber

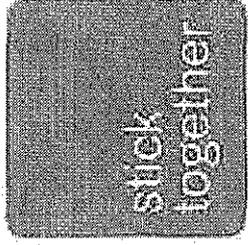
Cert. no. SW-COC-003141
www.fsc.org
© 1996 Forest Stewardship Council

The Nationwide Sprint Network reaches over 270 million people. The Nextel National Network reaches over 274 million people. The Sprint 3G Mobile Broadband Network reaches over 254 million people © 2008 Sprint. All rights reserved. SPRINT, the Sprint logo, and other trademarks are the property of Sprint Nextel. All other product or service names are property of their respective owners. All rights reserved.

**Attachment A -
Materials Available at T-Mobile**

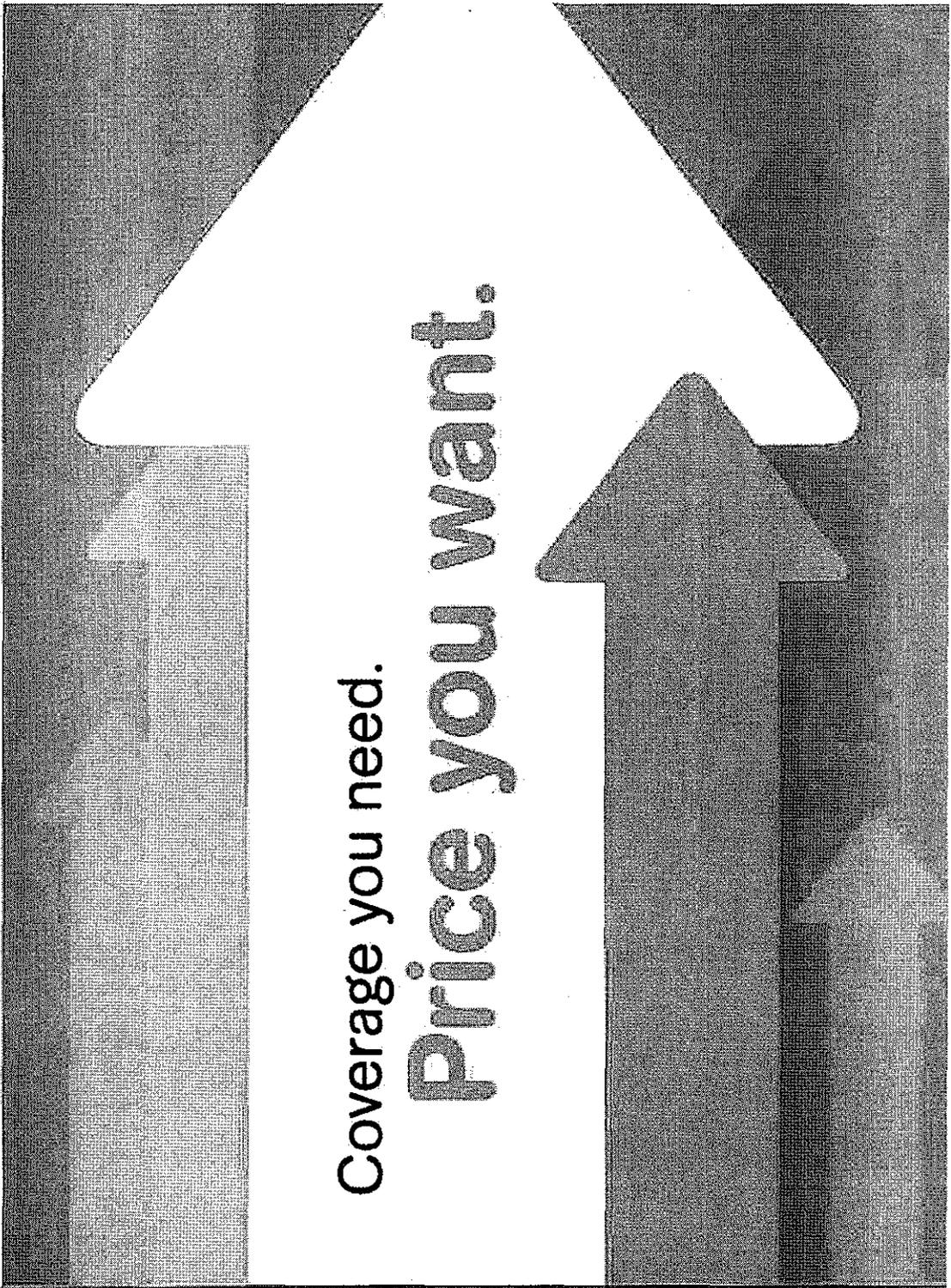
T-Mobile

Plans



Coverage you need.

Price you want.



T-Mobile has several family and individual plan options so you can find the perfect fit. (2)

Plus, each plan comes with the ability to send and receive messages on a pay-per-use basis, unless you have a Messaging Value Bundle. See www.T-Mobile.com for messaging rates.

my Faves for families™

Each member on your plan gets unlimited nationwide calling to their five favorite people. Any five U.S. phone numbers – even landlines. Plus, you'll get unlimited nationwide T-Mobile to T-Mobile calling and unlimited nights and weekends.

Price for 2 Lines Per Month	\$69.99	\$79.99	\$89.99	\$109.99	\$139.99
Included Minutes	400	700	1800	2500	3500
Unlimited Features	Nationwide calling to each person's Fav 5, Nights & Weekends + T-Mobile to T-Mobile calling				
Additional Lines	\$9.99 per line/mo.				

Family Add-on

<p>Family Allowances™ The easy way to manage kids' wireless usage and keep the family connected.</p> <ul style="list-style-type: none"> • Give your kids an upfront, monthly wireless allowance. • Set and change limits for minutes, messages and downloads straight from the Web. • Parents and kids can connect, even after allowances have been spent. 	\$4.99/mo.
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FamilyTime® Plans (3)

Every FamilyTime plan includes a pool of WHENEVER Minutes® for your family to share.

Price for 2 Lines Per Month	\$59.99	\$69.99	\$99.99	\$129.99	\$149.99
Included Minutes	700	1000	2500	3500	Unlimited
Unlimited Features	T-Mobile to T-Mobile + Nights & Weekends				Messaging
Additional Lines	\$9.99 per line/mo.				\$49.99 per line

Family Add-on

<p>Family Allowances™ The easy way to manage kids' wireless usage and keep the family connected.</p> <ul style="list-style-type: none"> • Give your kids an upfront, monthly wireless allowance. • Set and change limits for minutes, messages and downloads straight from the Web. • Parents and kids can connect, even after allowances have been spent. 	\$4.99/mo.
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For more information and other rate plan options, talk to a Sales Associate, see the T-Mobile Services brochure or visit www.T-Mobile.com.

my Faves[®] for individuals

Get unlimited nationwide calls to your five favorite people. Any five U.S. phone numbers – even landlines.

(4)

Price Per Month	\$39.99	\$49.99	\$59.99	\$69.99
Included Minutes	300	600	1000	1500
Unlimited Features	Nationwide calling to your Fave 5 [™] + Nights & Weekends	T-Mobile to T-Mobile + Nationwide calling to your Fave 5 [™] + Nights & Weekends		

Individual Plans

T-Mobile has a plan to fit your lifestyle and budget.

Price Per Month	\$29.99	\$39.99	\$49.99	\$59.99	\$99.99
Included Minutes	300	600	1000	1500	Unlimited
Unlimited Features	Weekends	Nights & Weekends	T-Mobile to T-Mobile + Nights & Weekends		Messaging

Individual Add-on

Unlimited T-Mobile to T-Mobile calling	\$8.99/mo
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Web and Messaging Plans

Our messaging and Web plans give you more ways to connect.

(5)

All-in-one Devices

Connect how and when you want on devices perfect for the Web, e-mail and messaging.

Price Per Month	\$24.99	\$34.99
Web Access	Unlimited	Unlimited
Domestic Messages	N/A	Unlimited

Phones

Calling may be your first choice, but now it's not your only one. Connect via the Web and messaging.

Price Per Month	\$9.99	\$19.95
Web Access	Unlimited	Unlimited
Domestic Messages	N/A	Unlimited

Messaging Value Bundles*

Messaging is a fun and easy way to stay connected with those who matter most. Send and receive any type of nationwide message: Text • Instant • Picture • Video

Price Per Month	\$4.99	\$9.99	\$14.99	\$24.95
Domestic Messages	300	1000	Unlimited	Unlimited for families

* The ability to send and receive messages is included with all plans. You can purchase a Messaging Value Bundle that includes a certain number of messages each month; bundles not available with all rate plans. If you don't have a Messaging Value Bundle, messages you send or receive will be charged on a per use basis. See www.T-Mobile.com for messaging rates.

BlackBerry® Plans

Experience effortless e-mail on the go. Simply choose a T-Mobile calling plan and add on BlackBerry service or choose a BlackBerry Service Plan.*

Service	Price Per Month	Nationwide Calling	Unlimited Nationwide
BlackBerry Internet Service Plan	\$38.99		<ul style="list-style-type: none"> BlackBerry 2.0, 2.1 Real Web Browsing
BlackBerry Enterprise Service Plan	\$38.99	Unlimited Domestic	<ul style="list-style-type: none"> BlackBerry 2.0, 2.1 Real Web Browsing Enterprise Server E-mail

BlackBerry Add-ons

Unlimited Nationwide BlackBerry E-mail, Real Web Browsing	\$24.99/mo.
Unlimited Nationwide BlackBerry E-mail, Real Web Browsing, Unlimited Domestic Messages	\$34.99/mo.

BlackBerry Enterprise Add-on

Unlimited Nationwide BlackBerry E-mail, Real Web Browsing, Enterprise Server E-mail	\$20.99/mo.
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* Some plans only available when combining voice and data on the same SIM card.

T-Mobile® Sidekick®

All Sidekick plans give you unlimited Web browsing for use with our Messaging Value Bundles suited to your specific needs.*

Service	Price Per Month	Domestic Messages	Web Access	Nationwide Calling
Sidekick	\$44.99	300	Unlimited	Plus 400 minutes
Sidekick Unlimited	\$54.99	Unlimited	Unlimited	Plus 400 minutes

Sidekick Add-ons

Unlimited Web Access	\$24.99/mo.
Unlimited Web Access, Unlimited Domestic Messages	\$34.99/mo.

* Available on select Sidekick devices.

T-Mobile® HotSpot®

Service	Price Per Month	Nationwide Wi-Fi Access
Unlimited National Annual Plan	\$29.99	<ul style="list-style-type: none"> Unlimited access across the T-Mobile HotSpot Network Unlimited T-Mobile service for 24 months
Unlimited National Month-to-Month Plan	\$39.99	<ul style="list-style-type: none"> Unlimited access across the T-Mobile HotSpot Network Month-to-month with unlimited service for 24 months

T-Mobile HotSpot Add-on

Unlimited access across the T-Mobile HotSpot Network	\$9.99/mo.	<ul style="list-style-type: none"> Available on T-Mobile HotSpot
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T-Mobile @Home

Available on family and individual plans, T-Mobile @Home service gives you unlimited nationwide calling on your home phone.

Service	Price Per Month	Nationwide Calling
T-Mobile @Home	\$9.99	Available on all T-Mobile service plans.

Unlimited HotSpot Calling

Available on family and individual plans, Unlimited HotSpot Calling gives you unlimited nationwide calling that originates on Wi-Fi when using your HotSpot-enabled phone at home or at any U.S. T-Mobile operated HotSpot location.

Service	Price Per Month	Nationwide Calling
Unlimited HotSpot Calling	\$9.99	Available on all T-Mobile service plans.

Call us at 877.822.SPOT (7768) to see if you are at a T-Mobile operated HotSpot location.

webConnect™ for Laptops and Other Devices

Now get the full Internet outside your home or while on the go.

Service	Price Per Month	Monthly Web Access
webConnect	\$9.99	Available on all T-Mobile service plans.
	20¢ per MB	Unlimited Wi-Fi access through T-Mobile HotSpot.

Downloads

Download ringtones, wallpaper, games, applications and other fun stuff right from your phone.

Music & Sounds

CalliTunes™ — Choose your favorite song, celebrity voice or comedy clip for callers to hear. • Dial *TUNE (3883) from any T-Mobile phone for a sample. Upon activation, each CalliTune is \$1.99; offer includes one free BONUS CalliTune service. \$1.49 per month after the first 30 days.	FREE service for 30 days
HIFI Ringers™ — Short clips of real music by the original artists.	\$2.49
MegaTones™ — Instrumental ringtones of your favorite songs.	\$1.99
Voices & Sounds™ — Clips of celebrity voices, comedy bits, sound effects and more.	\$1.99 - \$2.49

You can save on per item charges by purchasing a monthly pack of ringtone/wallpaper credits.

Games and Applications

Starting at \$2.49 per item	Choose from the latest titles, including puzzle, sports, action, and more. Available on all T-Mobile service plans. Offer good for 30 days. Monthly fee and non-refundable. See T-Mobile.com for details.
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Wallpaper

\$1.49-\$1.99 per item	Personalize your phone screen with a special image — selected from our exclusive photo gallery. Available on all T-Mobile service plans. Offer good for 30 days. Monthly fee and non-refundable. See T-Mobile.com for details.
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myFaves® Icons

99¢ per item	Get 10 icons for each of your faves — chosen from your favorite artists, bands, sports teams and more.
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* Not available to prepaid customers.

411 & More

\$1.70 per call plus airtime	24-hour live support, say hello to famous personalities, movie stars, and more. Available on all T-Mobile service plans. Offer good for 30 days. Monthly fee and non-refundable. See T-Mobile.com for details.
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(10)

All Pricing: Limited-time offers; subject to change. Taxes and fees additional. Rates apply only to calls and messages originating and received, and service used, within the U.S. (unless stated otherwise). International use incurs additional separate charges. Not all features or plans available on all devices. **Unlimited features are only for direct communication between two people. General Terms:** Credit approval, activation on a qualifying T-Mobile rate plan, per line activation fee and minimum one- or two-year agreement may be required. Up to \$200/line early cancellation fee applies to one- and two-year agreements (ask Sales Associate for details and other agreement options). Regulatory Programs Fee (not a tax or government-mandated charge) of 86¢ per line/month applies. Taxes approx. 6–28% of your monthly bill. Per month per line \$4.99 Control Charge applies (unless enrolled in Easy Pay) to FlexPay. Overage minutes extra; partial minutes rounded up for billing. **Voice Plans:** Some calls/features involve multiple calls (e.g., forwarded calls, call waiting and hold, conference calls, and unanswered incoming calls forwarded to voicemail); each call incurs separate charges. Airtime usage applies to toll-free, operator-assisted, voicemail and calling card calls. **myFaves:** Capable handset required. myFaves only applies to calls directly between two people and allows unlimited nationwide calling to five U.S. numbers. You can change myFaves numbers once per month. **Unlimited HotSpot Calling:** HotSpot-enabled phone, Unlimited HotSpot Calling feature, router, broadband Internet connection and qualifying rate plan required. Regular rate plan minutes are used when call does not originate on Wi-Fi network. When using HotSpot Calling, 9-1-1 service may not be available and your ability to receive emergency services may be impeded. **T-Mobile @Home:** Two-year service agreement, qualifying rate plan, T-Mobile @Home plan, HiPort router, compatible phone and broadband Internet connection required. Nationwide voice-only plan; all data, messaging and other services billed according to your regular rate plan and other pricing. See T-Mobile @Home Supplemental Terms and Conditions for more information, including important limitations on availability and reliability of 9-1-1 emergency service. **T-Mobile to T-Mobile** calls are directly dialed between T-Mobile customer devices while on the T-Mobile USA network (and not roaming on any domestic or international network); calls to voicemail and other T-Mobile service numbers not included. **Nights and Weekends:** Weekends are midnight Friday to midnight Sunday, and nights are 9:00 p.m. to 6:59 a.m. Monday through Friday (except for Prepaid), based upon start time of call. If on FlexPay, Prepaid or kidConnect, calls rated on a per minute basis. Time of call usually based on location of equipment transmitting call; if location is not available, time of call based on time zone associated with your phone number. Different terms apply to Prepaid Pay By The Day plan. See Prepaid brochure for details. **Family Allowances:** Qualifying postpaid multi-line plan required. Calls and messages sent or received while roaming on another carrier's network, and not on the T-Mobile USA network ("roaming"), may not count toward allowance limits. Even if a number is on your Never Allowed list or otherwise blocked, you may still be able to send and receive calls and messages to and from that number while roaming. Your Never Allowed list cannot include international numbers. Always Allowed numbers must be domestic 10-digit phone numbers; toll-free T-Mobile numbers are excluded. Family Allowances is for domestic use only and will not work while roaming internationally. **webConnect:** Overage charges apply; partial megabytes rounded up for billing. Device is not voice-capable. Data stick may not be shared in any manner, including use with a network or more than one computer or other device. This device requires a specific data plan; if you do not have the right plan, you may not be able to use data services. Domestic roaming not possible. Roaming charges may apply to use via non-T-Mobile-owned Wi-Fi networks. International use requires international service activation; usage does not apply toward five-gigabyte limit. **International rates** apply. **Data/Messaging:** You will be charged for all data sent by or to you through the network, regardless of whether received. Character length or file size of messages/attachments may be limited. Data speed is variable and may be impacted by network conditions and traffic. Your data session, plan or service may be slowed, suspended, terminated or restricted if you use your service in a way that interferes with or impacts our network or ability to provide quality service to other users, or if you roam for a significant portion of your usage (see T-Mobile's Terms and Conditions for details). We may also temporarily reduce data speed for a subset of customers who use a disproportionate amount of bandwidth during a billing cycle. You may not use your plan or device for prohibited uses listed in your data plan terms. Some devices require specific data plans; if you do not have the right plan for your device, you may not be able to use data services. Domestic use only. **Downloads:** Additional charges apply; not all downloads available on all devices. You obtain no rights in downloads; duration of use may be limited; may be stored solely for use with your device. T-Mobile is not responsible for any download lost due to your error. **Family Plans:** Limit five lines; all monthly allotments pooled. All lines of service must be activated in the same T-Mobile market and have the same billing address and area code. **HotSpot:** Devices using wireless connections may be vulnerable to unauthorized attempts to access data and software stored on the device. See the T-Mobile HotSpot Security Statement and HotSpot Terms and Conditions at www.T-Mobile.com for more information. **Coverage:** T-Mobile service is not available everywhere; 3G coverage available in limited markets; see a Coverage Map, available at www.T-Mobile.com, for details. **Abnormal Calling Patterns:** Call duration, text/instant message duration and/or your continued eligibility for service or any plan may be limited or terminated for (a) consumer protection purposes; (b) abusive conduct or abnormal call pattern(s); or (c) significant roaming. **Bill Details:** Your bill summarizes your charges, fees and taxes but does not include the details of services used. You may view bill details at my.t-mobile.com or, for an additional charge, we will provide detailed bills. We do not provide bills to FlexPay and Prepaid customers. See brochures, and **T-Mobile's Terms and Conditions (including arbitration provision)** at www.T-Mobile.com, for additional rate plan information, charges for features and services, and restrictions and details.

The RIM and BlackBerry families of related marks, images and related symbols are the exclusive property of and trademarks of Research In Motion Limited — used by permission. T-Mobile, the magenta color, T-Mobile @Home and the HotSpot design are federally registered trademarks of Deutsche Telekom AG. FamilyTime, WHENEVER Minutes, FlexPay, CallerTunes, kidConnect, HiFi Ringers, MegaTones, StylePaper, stick together, Sidekick, myFaves and the myFaves design are federally registered trademarks, and Family Allowances, Fave 5, myFaves for families and webConnect are service marks, of T-Mobile

T-Mobile

Coverage



Coverage you can really trust. That's T-Mobile coverage.

At T-Mobile, we believe you should always be able to connect with the people who matter most. That's why we strive to offer you an always-expanding national network, the fewest dropped calls and the dearest service quality. We also offer blazing-fast WiFi on your laptop and/or handheld device at more than 7,500 T-Mobile HotSpots (across 100+ cities, nationwide).

We've got you covered.

Ask a Sales Associate to show you our signal strength whenever you plan to go — right down to street-level detail. Or perform your own Personal Coverage Check in the store or at www.T-Mobile.com.

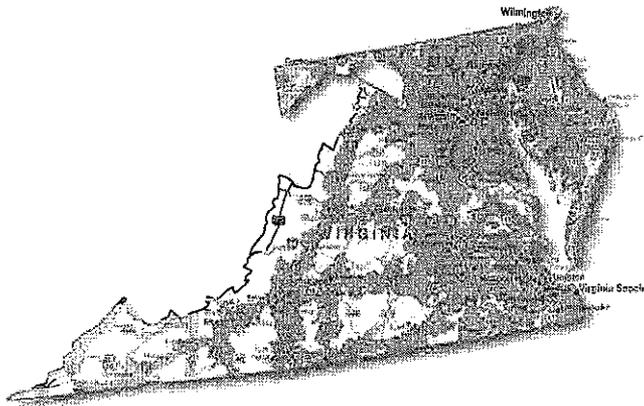
3

Connect in more places than ever.

Regional Coverage

Coverage Key

-  T-MOBILE USA COVERAGE
-  850 MHz ROAMING COVERAGE AVAILABLE ON MOST HANDSETS
-  1900 MHz ROAMING COVERAGE AVAILABLE ON ALL HANDSETS

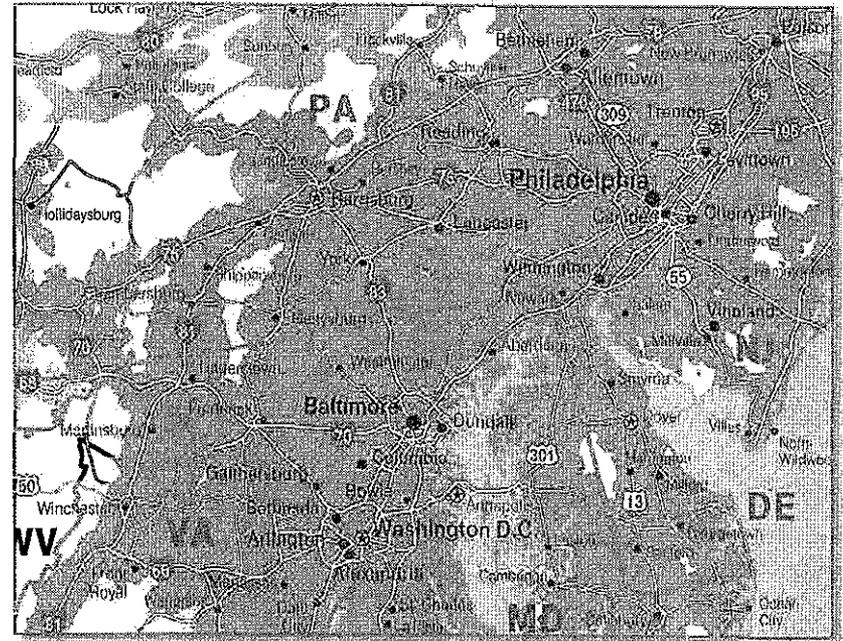


Based on computer-generated models approximating our anticipated outdoor coverage on the T-Mobile USA network and the networks of our roaming partners. Your personal experience may vary.

See Map Information for coverage details and limitations.

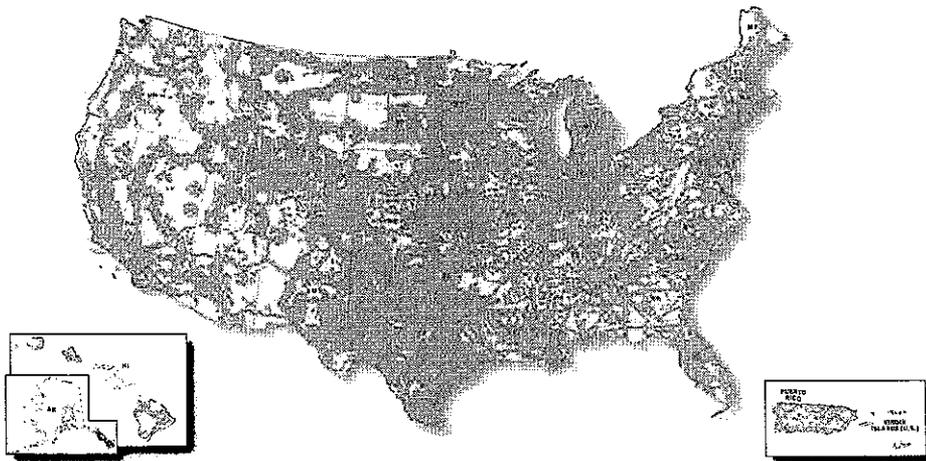
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Local Coverage



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National Coverage



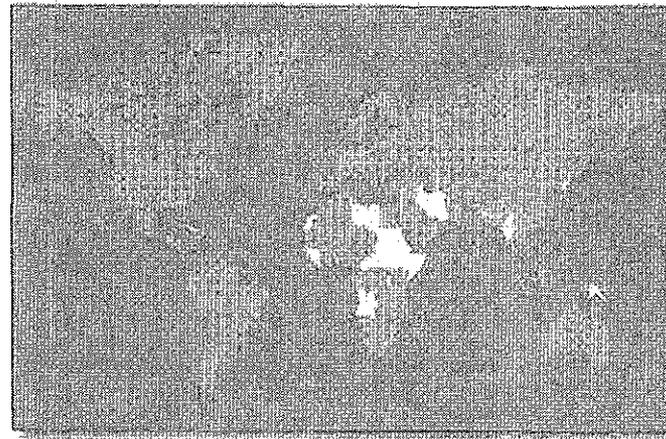
While in this area, make calls to anyone in the United States and Puerto Rico — with no nationwide roaming or nationwide long distance charges — with any T-Mobile national rate plan. Visit www.T-Mobile.com/morecoverage for answers to frequently asked questions about our coverage.*

Standard usage charges apply.

* T-Mobile to T-Mobile and data services are not available in certain areas included in the national coverage map. Long distance charges apply to calls to the U.S. Virgin Islands.

6

International Coverage



This map indicates countries where T-Mobile has international roaming partners. A multi-band phone and credit approval are required. Ask a T-Mobile Sales Associate for more details and pricing.

Prepaid and FlexPay™ customers can enjoy coverage in Mexico and Canada!

Calling or traveling abroad? With T-Mobile, you're good to go. Just activate your T-Mobile WorldClass® service by dialing 611 on your T-Mobile phone or calling 1-800-937-8997.*

- Call and text from the U.S. to more than 220 countries. We even offer special rates to Mexico and Canada.
- Roam worldwide when you're traveling — call, text message and e-mail in more than 180 countries.
- Send text messages from the U.S. or abroad — it's an affordable way to stay in touch worldwide.

* WorldClass service and credit approval required. Not available on all rate plans or in all areas. Additional charges apply; rates subject to change. Capable handset required.

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②

Prepaid, FlexPaySM and kidConnect[®] Coverage



T-Mobile's coverage is really going places. Prepaid, FlexPay and kidConnect coverage continues to expand, and now encompasses approximately 97% of our national coverage map.

- While in this area, make calls to anywhere in the United States (including Alaska and Hawaii) and pay no separate long distance or roaming charges. Minutes used to make or receive calls while you are in this area will be deducted from your balance.*

* T-Mobile to T-Mobile and data services are not available in certain areas included in coverage map. Long distance charges apply to calls to the U.S. Virgin Islands. For Prepaid customers, additional charges may apply to calls made to Puerto Rico.



MAP INFORMATION: Maps predict and approximate our anticipated wireless coverage area outdoors, which varies from location to location. Maps may include locations with limited or no coverage, and do not guarantee service availability. Even within a coverage area, factors — including network changes, traffic volume, service outages, technical limitations, signal strength, your equipment, terrain, structures, foliage, weather and other conditions — may interfere with actual service, quality and availability, including the ability to make, receive and maintain calls. Portions of the mapped areas include networks operated by our roaming partners, and we are not responsible for the performance of those networks. **T-MOBILE TO T-MOBILE** calls are directly dialed between T-Mobile customer devices while on the T-Mobile USA network (and not roaming on any domestic or international network). Calls to voicemail and other T-Mobile service numbers not included. **ROAMING:** Nationwide roaming refers to usage while on a roaming partner's network within the domestic coverage area. International roaming incurs additional charges and refers to usage while you are outside of the United States. Multi-band (850/1900 MHz) GSM/GPRS handset required for access to 850 Roaming Coverage. Ask a T-Mobile Sales Associate or visit www.T-Mobile.com/morecoverage for more information regarding handset requirements and T-Mobile 850 MHz coverage. 850 MHz roaming is offered through our roaming partners. Certain devices and features (e.g., picture and video messaging) will not work if you are roaming. If you travel outside of these coverage areas, your phone will not work. However, people can still leave you voicemail and send text messages that you will receive when you get back into a coverage area. To see if our coverage meets your needs, take advantage of our Personal Coverage Check at a T-Mobile retail store or online at www.T-Mobile.com. If, after signing up for service, our coverage doesn't meet your needs, take advantage of our return policy (available with most plans). See Pricing, Services and Devices brochures, and **T-Mobile's Terms and Conditions (including mandatory arbitration)** at www.T-Mobile.com, for rate plan information, charges for features and services, and restrictions and details. T-Mobile, WorldClass, t-zones, and the magenta color are federally registered trademarks of Deutsche Telekom. stick together and kidConnect are federally registered trademarks, and FlexPay is a service mark, of T-Mobile USA, Inc. © 2008 T-Mobile USA, Inc.

**Attachment A -
Materials Available at Verizon**

Fall 2009 | FREE

verizonwireless

Your Guide

Plans, pricing, latest phones and more



Satisfy Your App-etite

Music, games, navigation and more: Our apps let you work and play on the go.

Plus

FREE How-To Wallet Card

Take the Internet, leave the bulk.

Lightweight and inexpensive, a Netbook combines the connectivity of a laptop with the mobility of a phone.

A new way to connect

The first Netbook from Verizon Wireless has America's Largest and Most Reliable 3G Network built in. A Verizon Wireless Netbook gives you access to all the Internet has to offer – at a fraction of the size and cost of a laptop. You'll want to take it with you everywhere – and you can.

Fast times on the web

With Mobile Broadband and a Netbook from Verizon Wireless, you get a high-speed connection to the web that you can count on. Check email, browse the Internet and send instant messages with a full QWERTY keyboard and a screen that feels like a laptop. But weighing in at just a few pounds and measuring an inch thick, your new Netbook can go just about anywhere. And since it's less than the price of most laptops, you'll have more money to spend when you get there, too.

Maximum mobility

Your Netbook, paired with Mobile Broadband, gives you speed and access to America's Largest and Most Reliable 3G Network, covering more than 280 million people in 264 major metropolitan areas and 268 primary airports in the United States.

Additional Information

For Mobile Broadband pricing information, see pages 24–25.

* To get the full benefits of roaming globally outside the U.S. on GSM networks, you must ensure that a SIM card is installed in your Netbook and that you've subscribed to a global plan or feature.

The real deal

Get a new Netbook and get a big discount when you sign up for a one- or two-year Mobile Broadband Plan or GlobalAccess Plan. Several plans are available, from a basic plan to a global plan* that travels with you around the world. And with a one-year manufacturer's warranty, your Netbook comes with peace of mind built in.

Visit verizonwireless.com/hpnetbook for details.



Carrying Bag

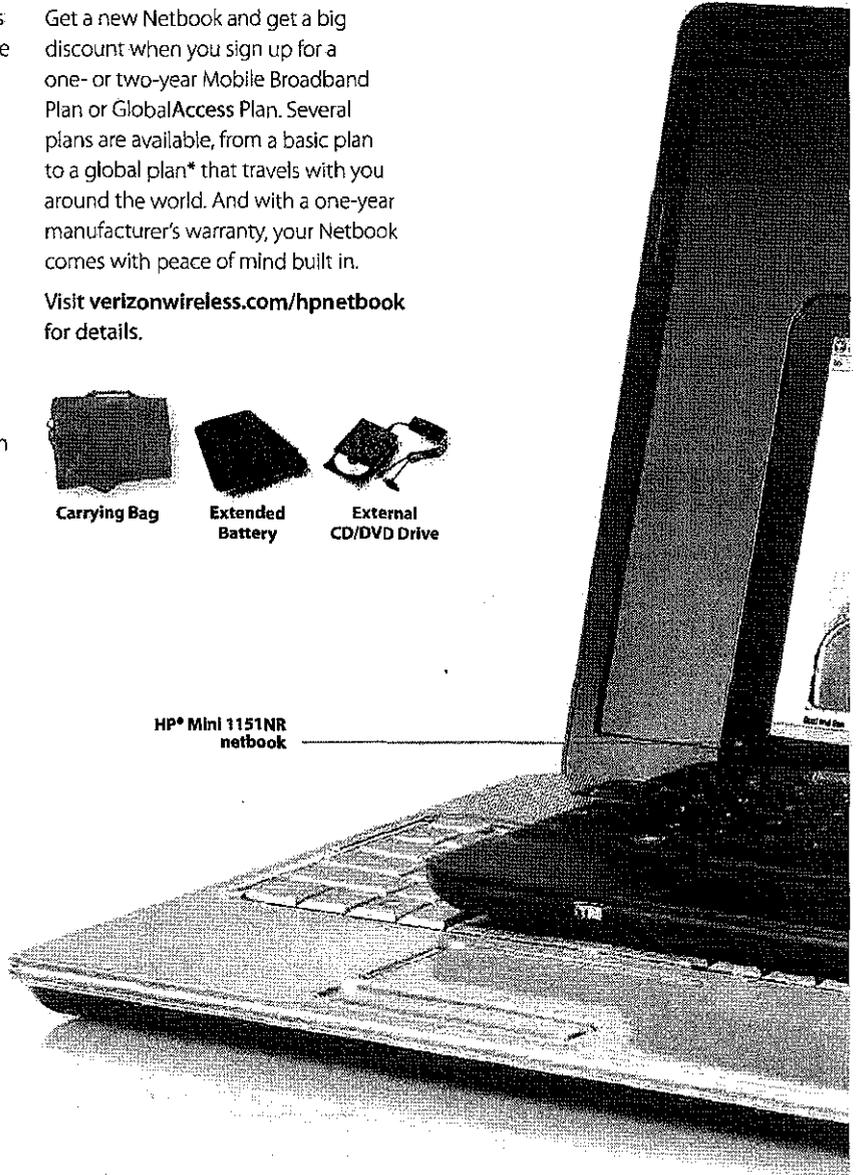


Extended Battery



External CD/DVD Drive

HP® Mini 1151NR netbook



Be your own hotspot with MiFi.

Five devices, one mobile 3G connection. Only with MiFi.*

Put Wi-Fi where you are with the new, portable Verizon Wireless MiFi™ 2200 Intelligent Mobile Hotspot. You can use Mobile Broadband to connect up to five Wi-Fi-enabled devices in remote places.

Features include:

- *Standard Wi-Fi security protocols
- *Removable battery
- *USB cable mode
- *Internal antenna

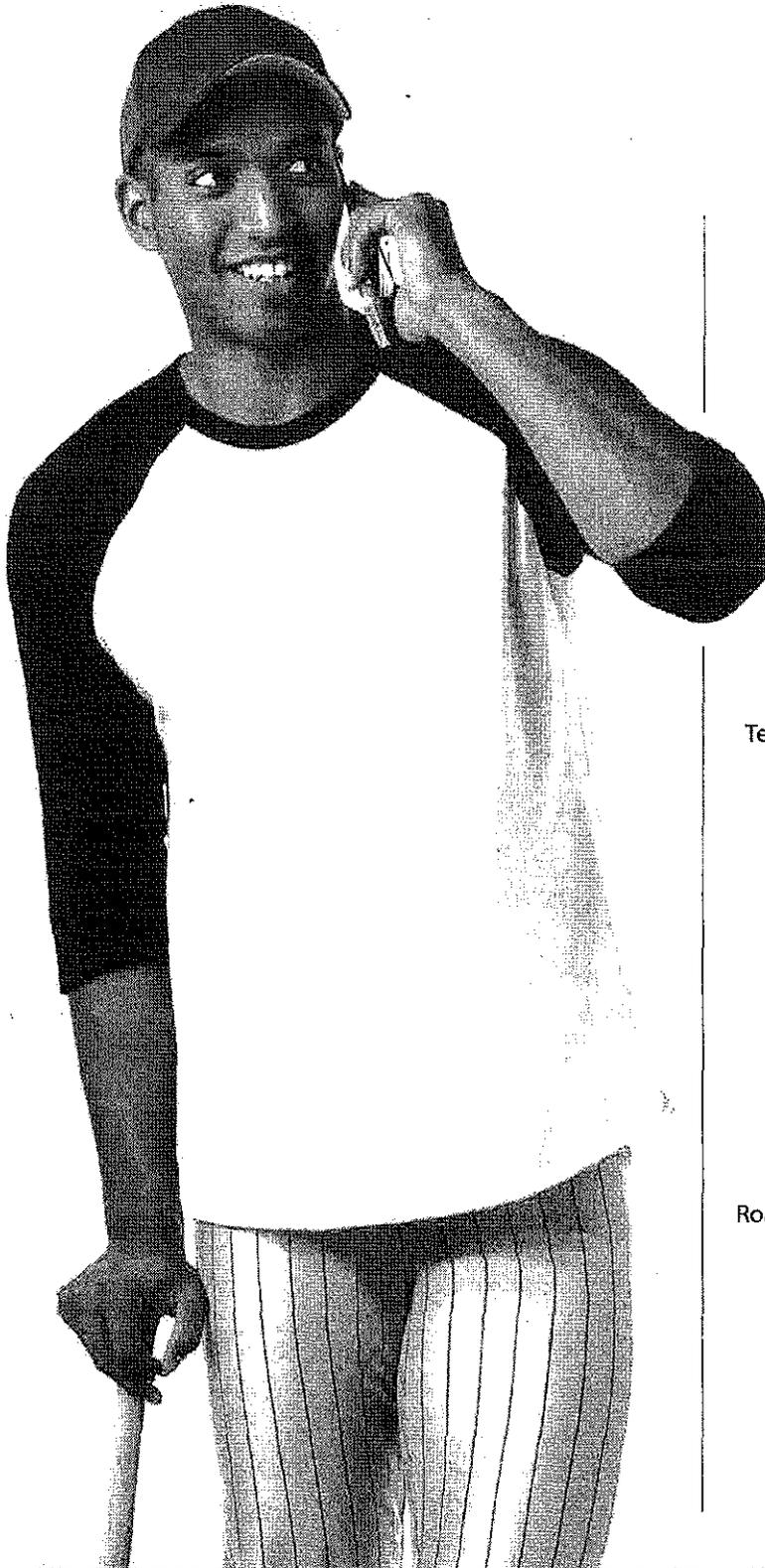
Visit verizonwireless.com/mobilehotspot for details.



Verizon Wireless MiFi™ 2200
Intelligent Mobile Hotspot

*MiFi is a trademark of Novatel Wireless, Inc.

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Worry Free Guarantee[®]

No wireless provider stands behind you like Verizon Wireless.

As a Verizon Wireless Customer:

You'll enjoy America's Largest and Most Reliable Wireless Network.

We test and improve our network every day so you get the best service on America's Largest and Most Reliable Voice and 3G Data Network.

You can change your Plan at any time with no fee or contract extension.*

As your needs change, you can move to any current plan without paying a fee or extending your contract.

You'll get our 30-day Satisfaction Guarantee.†

At Verizon Wireless, we stand behind our service. If you're not completely satisfied, you can return your device and cancel service within 30 days of activation and pay no early termination fee.

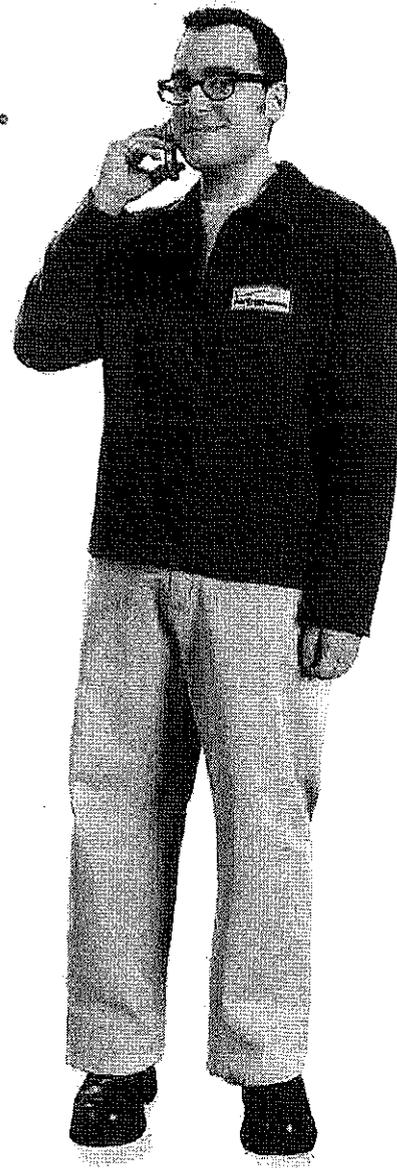
You can get a free device every two years with *New Every Two*[®].‡

Sign up for a two-year plan of at least \$34⁹⁹ and qualify for a free device, up to \$30 or \$50 in value depending on your Plan, with a two-year contract renewal. You can also transfer your *New Every Two* credit to another line on your account.

You'll enjoy exceptional customer service with our team of certified wireless experts.

We're here to help when and how you need it. Come into any Communications Store, or for 24/7 assistance call us or go online.

For complete details on Worry Free Guarantee and *New Every Two*, see page 44 in the Important Information section.



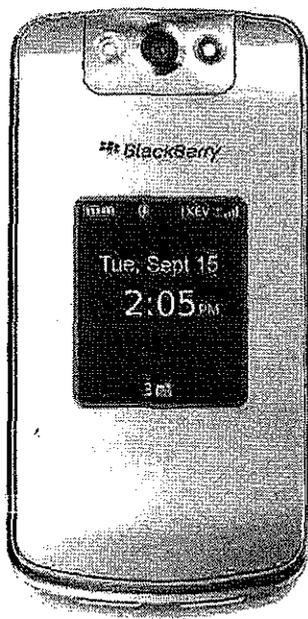
*Some plans are available only with specific equipment. Acceptance of a promotion may require a new one- or two-year agreement. Customer will be limited to two plan changes per billing cycle.

†Return policies may vary and *New Every Two* redemptions may not be available at Verizon Wireless authorized agents. Your *New Every Two* discount is applied to the two-year discounted retail price of a new device.

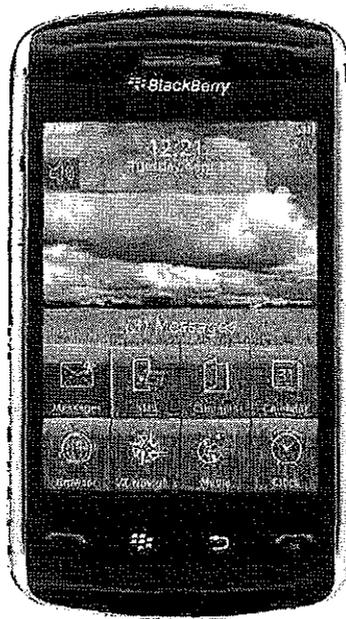
Fall 2009

Get more BlackBerry out of your BlackBerry.

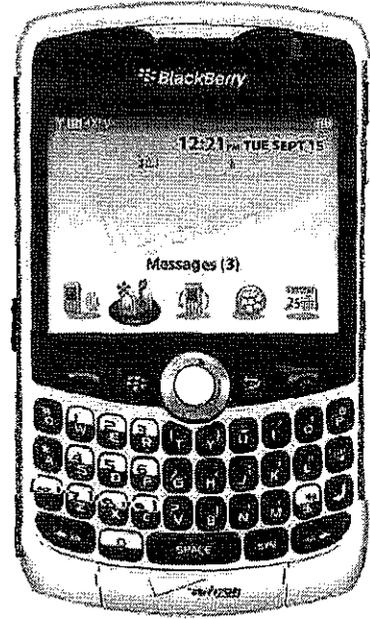
BlackBerry runs better on America's Largest and Most Reliable 3G Network.



BlackBerry® Pearl™ Flip 8230



BlackBerry® Storm™



BlackBerry® Curve™ 8330

Keep your world in the palm of your hand.

Verizon Wireless delivers more of what you love about BlackBerry. When you need it. Where you need it. Because America's Largest and Most Reliable 3G Network provides an exceptional platform for reliable emails, dependable downloads and blazing-fast 3G web browsing. BlackBerry on the Network. It's everything you love about BlackBerry and more.

BlackBerry® Tour™

New from Verizon Wireless, the Global-capable Tour goes with you around the world.

BlackBerry® Storm™

The first touch screen smartphone from BlackBerry has a virtual keypad with SurePress™ technology.

BlackBerry® Pearl™ Flip 8230

The Flip makes it easy to stay connected with a convenient flip design and SureType® keyboard.

BlackBerry® Curve™ 8330

BlackBerry's popular Curve offers an intuitive QWERTY keypad and is VZ Navigator™-capable.

Devices

The latest phones, devices & accessories from Verizon Wireless | Pages 4-9



BlackBerry® Tour™

Verizon Wireless Phones 4

Find the hottest touch screen, flip and slider phones, plus the accessories you need.

Smartphones 6

Get advanced capabilities with our newest smartphones.

Push to Talk Phones 7

Use these phones to connect to your world with just the push of a button.

Netbooks 8

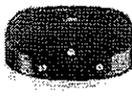
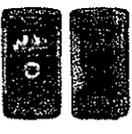
Enjoy the connectivity of a laptop in a more portable package.

MiFi™ 2200 Intelligent

Mobile Hotspot 9

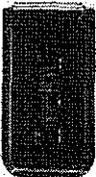
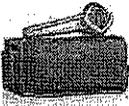
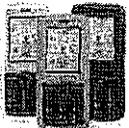
Share your Mobile Broadband connection.

Verizon Wireless phones & accessories.

		Enhanced Multimedia Phone	Touch Screen Phones			
<p>Compare our phones. Once you've picked your phone, make it do more with great apps from Verizon Wireless. Check them out in the Options section, pages 30-43.</p>						
		Samsung Rogue™	LG Versa™	Motorola Krave™ <small>(While supplies last)</small>	LG enV® TOUCH	LG enV® 3
Capabilities* Available Not Available	V CAST Music with Rhapsody™	✓	Wireless and PC downloads only	✓	✓	✓
	V CAST Video On Demand	✓	✓	✓	✓	✓
	ChapStone	✓	✓	✓	✓	✓
	Mobile Email	✓	✓	✓	✓	✓
	VZ Navigator	Domestic	Domestic	Domestic	Domestic	Domestic
	Visual Voice Mail	✓	✓	✓	✓	✓
	Text, Picture, Video and Instant Messaging	✓	✓	✓	✓	✓
	Mobile Web	HTML browser	HTML browser	HTML browser	HTML browser	HTML browser
	Data Package Required	✓	-	-	-	-
	V CAST Song ID	✓	✓	✓	✓	✓
Features Available Not Available	Keyboard Type	QWERTY	Virtual	Virtual	Virtual and QWERTY	QWERTY
	microSD™ Memory Slot	✓	✓	✓	✓	✓
	Digital Camera	3.0-megapixel	2.0-megapixel	2.0-megapixel	3.2-megapixel with flash	3.0-megapixel
	Bluetooth® Stereo Support	✓	✓	✓	✓	✓
	Usage Controls	✓	✓	✓	✓	✓
	Other Features and Capabilities	Touch screen navigation, EV-DO Rev. A-capable	Touch screen navigation	Interactive clear flip, V CAST Mobile TV	Touch screen navigation, EV-DO Rev. A-capable	Dashboard, enhanced messaging features
Recommended Accessories		 Jawbone® Prime	 QWERTY Keypad	 MOTOROKR™ EQ7 Wireless Speaker	 Snap-On Hard Covers	 Body Glove Snap-On Covers

* Additional charges may apply when using certain capabilities.

† Verizon Wireless Prepaid customers cannot use their Prepaid account for V CAST Music with Rhapsody® monthly subscription service, but they can sign up on rhapsody.com with a credit card and sync music to their subscription-capable device or subscription-capable MP3 player. Subject to V CAST Music with Rhapsody® standard terms and conditions available at support.vzw.com/terms/products/music.html

Flip Phones				Slider Phones		Bar Phone
						
Samsung Renown™	Samsung Alias™ 2	Nokia 7205 Intrigue	CASIO EXILIM	Motorola Rival™	Samsung Trance™	LG Glance™
✓	✓	✓	✓	✓	Subscription and PC downloads only	-
✓	✓	✓	✓	✓	-	-
✓	✓	✓	✓	✓	✓	✓
✓	✓	✓	✓	✓	✓	✓
Domestic	Domestic	Domestic	Domestic	Domestic	Domestic	Domestic
✓	✓	✓	✓	✓	-	-
✓	✓	✓	✓	✓	Text, Picture and Voice	Text, Picture and Voice
✓	✓	✓	HTML browser	✓	✓	✓
-	-	-	-	-	-	-
✓	✓	✓	✓	✓	✓	✓
Keypad	QWERTY	Keypad	Keypad	QWERTY	Keypad	Keypad
✓	✓	✓	✓	✓	✓	-
2.0-megapixel	2.0-megapixel	2.0-megapixel with flash	5.1-megapixel with autofocus and flash	2.0-megapixel	1.3-megapixel	1.3-megapixel
✓	✓	✓	✓	✓	✓	-
✓	✓	✓	✓	✓	✓	✓
Dashboard, Quad Band-capable, Global Phone, pre-installed SIM card	Dual-flip design, dynamic keypad with E-Ink technology	Dashboard, his and hers keypads	Dashboard; full-fledged digital camera; meets military specs 810F standards for water, shock and dust resistance	Touch dialpad	1 GB of internal memory dedicated for music (actual formatted capacity is less)	Ultra-slim form factor with premium design
						
Plantronics Discovery® 925 Bluetooth Earpiece	Jabra 2050 Bluetooth Headset	Motorola MOTOROKR™ MEH25 Stereo Headset	Universal Side Pouch	MOTOROKR™ 5305 Bluetooth Stereo Headphones	Plantronics Explorer® 232 Bluetooth Headset	Silicone Covers

Phones subject to availability. Selection may vary. Accessories may vary by device model.
Rhapsody and the Rhapsody logo are trademarks and registered trademarks of RealNetworks, Inc.

Smartphones, Push to Talk phones & accessories.

		Smartphones						
								
		BlackBerry® Pearl™ Flip 8230	Samsung Omnia™	HTC Touch Diamond™	BlackBerry® Curve™ 8330	BlackBerry® Tour™	Samsung Saga™ (Colors may vary)	
Capabilities* Available Not Available	Wireless Email Service	BlackBerry	Email and Web for Smartphone, Pocket Outlook	Email and Web for Smartphone, Pocket Outlook	BlackBerry	BlackBerry/GlobalEmail	Email and Web for Smartphone, Pocket Outlook, GlobalEmail	
	Global Capable	-	-	-	-	✓	✓	
	View Photos, Videos, and Other Rich Media	✓	✓	✓	✓	✓	✓	
	Wi-Fi	-	✓	✓	-	-	✓	
	EV-DO	Rev. 0	Rev. A	Rev. A	Rev. 0	Rev. A	Rev. A	
	Tethered Modem for Mobile Broadband Connect†	✓	✓	✓	✓	✓	✓	
	Bluetooth® File Transfer	✓	✓	✓	✓	✓	✓	
	VZ Navigator	Domestic	Domestic	Domestic	Domestic	Domestic and Global	Domestic	
	Voice Mail Mail	✓	✓	✓	-	✓	-	
	V-CAST Music with Rhapsody®	-	-	-	-	✓	-	
Features Available Not Available	Keyboard Type	SureType	Virtual	Virtual	QWERTY	QWERTY	QWERTY	
	Display Screen	2.0-megapixel	5.0-megapixel	3.2-megapixel	2.0-megapixel	3.2-megapixel	2.0-megapixel	
	Single-Multi-Touch	✓	✓	✓	✓	✓	✓	
Specifications	Flash/RAM Memory	128 MB/ 64 MB RAM	256 MB/ 128 MB RAM (8 GB on-board memory)	256 MB/ 192 MB RAM	96 MB/ 32 MB RAM	256 MB/ 256 MB RAM (2 GB microSD card pre-installed)	256 MB/ 128 MB RAM	
	Expandable Memory (microSD Card)	16 GB	16 GB	16 GB	8 GB	16 GB	16 GB	
Recommended Accessories		Clear Snap-On Cover		Display Protectors		Universal Side Pouch		Soft-Touch Hard Cases
		16 GB Memory Card		Extended Battery				

*Additional charges may apply when using certain capabilities.
 †With Mobile Broadband Connect devices that are EV-DO Rev. A-capable, you can expect download speeds of 600-1400 Kbps and upload speeds of 500-800 Kbps. With Mobile Broadband Connect devices that are not EV-DO Rev. A-capable, you can expect download speeds of 400-700 Kbps and upload speeds of 60-80 Kbps. VZAccess Manager required; visit vzam.net



**HTC
Ozone™**



**BlackBerry®
Storm™**

Find out more.
For pricing and more details on
Push to Talk, please see page 43.



**Motorola
Adventure™**
(While supplies last)



**GzOne
Boulder™**
(While supplies last)



**Verizon Wireless
CDM8975**

Push to Talk Phones

Email and Web
for Smartphone,
Pocket Outlook,
GlobalEmail

BlackBerry/
GlobalEmail

Capabilities*
✓ Available
- Not Available

V CAST Music
With Rhapsody™

V CAST Video On Demand

Chaperone

Mobile Email

VZ Navigator

Weather@cast

Text, Picture, Video and
Instant Messaging

Mobile Web

Data Package Required

V CAST Streaming

Features
✓ Available
- Not Available

microSD/Memory Slot

Camera

Document/Spreadsheet Support

Other Capabilities and Features

Recommended Accessories

✓
✓
✓

✓

Rev. A

Rev. A

✓

✓

Domestic

Domestic and
Global

✓

✓

QWERTY

Virtual

2.0-megapixel

3.2-megapixel

✓

✓

256 MB/
192 MB RAM

128 MB/192 MB RAM
(1 GB on-board
memory, 8 GB
microSD card
pre-installed)

16 GB

16 GB



**PDA Universal
Pouch**



**Silicone
Covers**

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

Domestic

Domestic

Domestic

-

-

-

✓

✓

✓

✓

✓

✓

-

-

-

✓

✓

✓

✓

✓

✓

2.0-megapixel

1.3-megapixel with flash

1.3-megapixel

✓

✓

✓

Rev. A Push to Talk-
capable, Field Force
Manager-capable,
meets military specs
810F standards
for dust and shock
resistance

Rev. A Push to Talk-
capable; Field Force
Manager-capable; meets
military specs 810F
standards for water, dust
and shock resistance

Rev. A Push to Talk-
capable, Field Force
Manager-capable,
dedicated
VZ Navigator key



Rugged Side Pouch



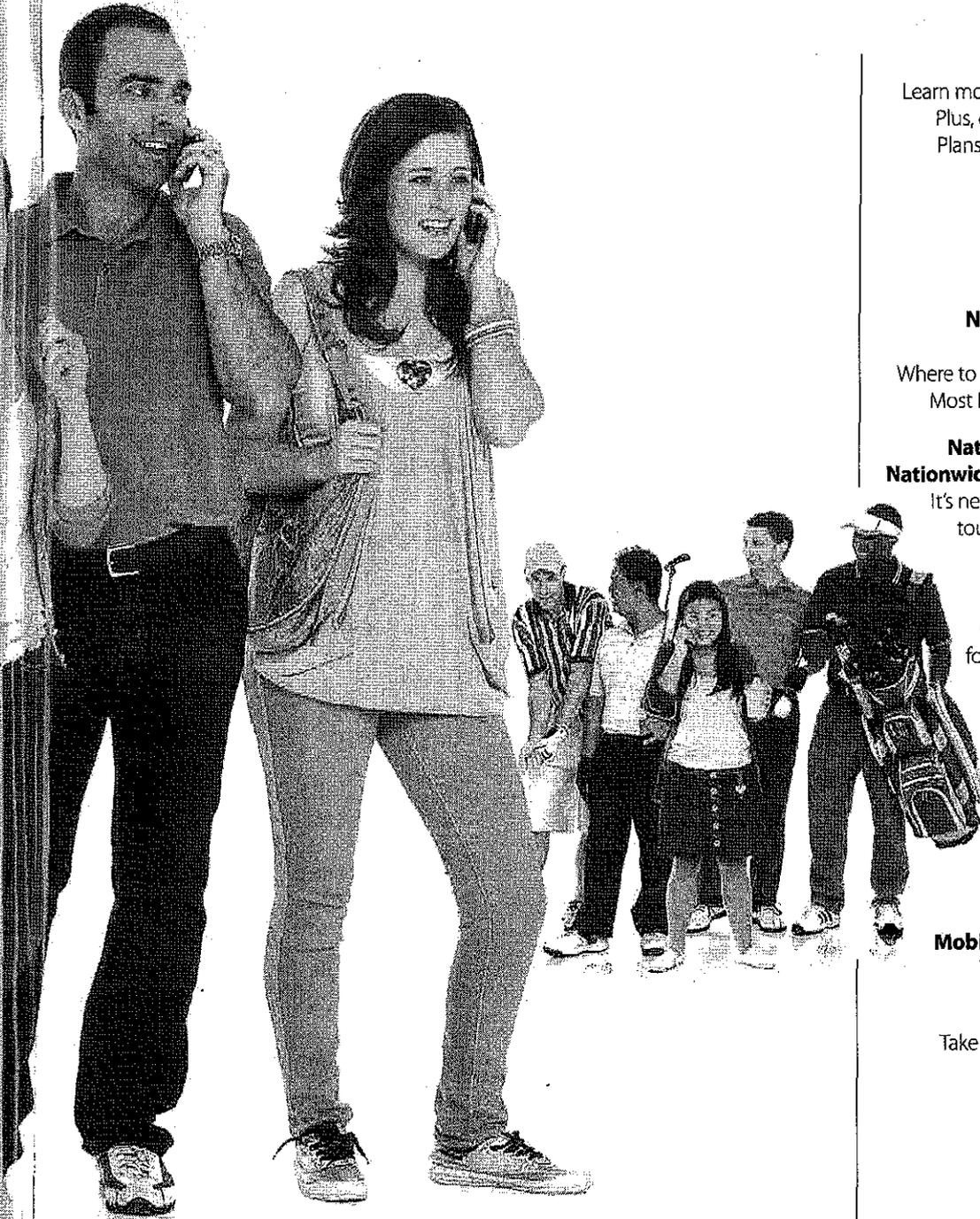
Rugged Pouches



Holster

Plans

Plans, pricing & options that are right for you | Pages 12-29



Nationwide Plans 12

Learn more about Friends & Family. Plus, check out our Nationwide Plans with Unlimited Mobile to Mobile Calling.

Data Packages 14

Email, web and more – at prices that fit your life.

Nationwide Plans Rate & Coverage Area Map 16

Where to get America's Largest and Most Reliable Wireless Network.

Nationwide Plus Canada & Nationwide Plus Mexico Plans 18

It's never been easier to keep in touch across North America.

Nationwide 65 Plus Plans 20

Convenient plans created for customers 65 and older.

Text, Picture, Video & Instant Messaging 21

Stay in touch in an instant.

Prepaid Plans 22

Enjoy freedom of choice and pay as you go.

Mobile Broadband Plans 24

Take your office with you.

My Verizon 26

Take charge of your account – online or on your phone.

Global Services 28

We have options to keep you connected in hundreds of destinations.

Nationwide Plans

Pick the plan that fits your life and get unlimited Mobile to Mobile Calling with more than 80 million Verizon Wireless customers.

Plus, talk all you want with Friends & Family. Unlimited calling to any 10 numbers. Anywhere in America. Anytime.

All Verizon Wireless Nationwide Plans include:

Unlimited National Mobile to Mobile Calling Minutes

As always, get unlimited talk with America's Largest Mobile to Mobile Calling Family. More than 80 million strong.

No Domestic Roaming or Long-Distance Charges

Coverage not available everywhere. Airtime charges apply.

Night & Weekend Minutes

Night hours:
(Mon-Fri) 9:01 p.m.–5:59 a.m.
Weekend hours:
(Sat-Sun) 12:00 a.m.–11:59 p.m.

Mobile Web¹

Additional Information

Anytime Minutes, National Mobile to Mobile Calling Minutes, Night & Weekend Minutes and Per-Minute Rate are for domestic calls from within the Nationwide Rate and Coverage Area. See pages 16–17 or 49 for Coverage Areas for other services. For Additional Plan Information, see page 44. For the Nationwide map, see pages 16–17.

Other services:

Calling Features²

Basic Voice Mail with Message Waiting Indicator,³ Caller ID, Call Waiting,¹ 3-Way Calling,¹ Call Forwarding¹ and No Answer/Busy Transfer.¹

Text, Picture and Video Messaging

See page 21.

International Roaming/Global Services

Going overseas? No worries. We offer voice service in more than 220 destinations. See pages 28–29.

411 Search^{4,2}

Talk to a real person and get the information you need.

¹Too busy to write down the number? Automatic call completion and text message of listing available.

²Send listing information directly to VZ Navigator to get free driving directions.³

³\$1.99 per call, plus airtime and standard Text Messaging charges.



¹ Data package of \$9.99 or higher, or Nationwide Premium or Connect Plan, required for Enhanced Multimedia phones. All Windows Mobile, Palm and BlackBerry smartphones require a data feature of \$29.99 or higher, or a data plan.

² Not available in some areas.

³ Airtime applies to message retrievals from your wireless phone. Voice Mailboxes not initialized within 60 days of activation will be canceled.

⁴ Airtime applies to all simultaneous calls and to forwarded/transferred calls even if you send the call to wireline telephones.

² Per-call charge and availability of credit for incorrect information for 411 Search may vary when your phone's banner displays "Extended Network" or "Roaming." Text charges may apply for 411 Search text message. If you are not a Verizon Wireless Prepaid customer and receive incorrect information from 411 Search, call 411 immediately to request credit. Preference options may not be available in all areas.

³ Not available in all areas or to Verizon Wireless Prepaid customers (see vznavigator.com/about.html for details). Not all listings are available for driving directions. VZ Navigator subscription required for use.

Nationwide Single-Line

Monthly Anytime Minutes	Premium Plan ⁴	Connect Plan ⁴	Select Plan	Basic Plan	Per-Minute Rate After Allowance	Friends & Family Pick 5 friends
	<ul style="list-style-type: none"> Voice calls Unlimited Messaging⁵ to anyone on any network in the U.S. V CAST Video On Demand Unlimited Data VZ Navigator Mobile Email 	<ul style="list-style-type: none"> Voice calls Unlimited Messaging⁵ to anyone on any network in the U.S. Unlimited Data Mobile Email 	<ul style="list-style-type: none"> Voice calls Unlimited Messaging⁵ to anyone on any network in the U.S. 	<ul style="list-style-type: none"> Voice calls 		
	Monthly Access					
450	\$79 ⁹⁹	\$69 ⁹⁹	\$59 ⁹⁹	\$39 ⁹⁹	45¢	-
900	\$99 ⁹⁹	\$89 ⁹⁹	\$79 ⁹⁹	\$59 ⁹⁹	40¢	✓
1350	\$119 ⁹⁹	\$109 ⁹⁹	\$99 ⁹⁹	\$79 ⁹⁹	35¢	✓
Unlimited ⁶	\$139 ⁹⁹	\$129 ⁹⁹	\$119 ⁹⁹	\$99 ⁹⁹		
Data Sent or Received ⁷	Included	Included	\$1 ⁹⁹ /MB (or per data package)	\$1 ⁹⁹ /MB (or per data package)		

Nationwide Family SharePlan⁸

Shared Monthly Anytime Minutes	Monthly Access – for the first two lines				Per-Minute Rate After Allowance	Friends & Family Pick 10 friends
	Premium Plan ⁴	Connect Plan ⁴	Select Plan	Basic Plan		
700	\$139 ⁹⁹	\$119 ⁹⁹	\$99 ⁹⁹	\$69 ⁹⁹	45¢	-
1400	\$159 ⁹⁹	\$139 ⁹⁹	\$119 ⁹⁹	\$89 ⁹⁹	40¢	✓
2100	\$179 ⁹⁹	\$159 ⁹⁹	\$139 ⁹⁹	\$109 ⁹⁹	35¢	✓
3000	\$219 ⁹⁹	\$199 ⁹⁹	\$179 ⁹⁹	\$149 ⁹⁹	25¢	✓
4000	\$269 ⁹⁹	\$249 ⁹⁹	\$229 ⁹⁹	\$199 ⁹⁹	20¢	✓
Unlimited ⁶	\$269 ⁹⁹	\$249 ⁹⁹	\$229 ⁹⁹	\$199 ⁹⁹		
Each additional line (Up to 3)	\$29 ⁹⁹ for Premium Plan or \$119 ⁹⁹ for Premium Unlimited Plan, \$19 ⁹⁹ for Connect Plan or \$109 ⁹⁹ for Connect Unlimited Plan, \$9 ⁹⁹ for Select Plan or \$99 ⁹⁹ for Select Unlimited Plan	\$19 ⁹⁹ for Connect Plan or \$109 ⁹⁹ for Connect Unlimited Plan, \$9 ⁹⁹ for Select Plan or \$99 ⁹⁹ for Select Unlimited Plan	\$9 ⁹⁹ Select Plan or \$99 ⁹⁹ for Unlimited Plan	\$9 ⁹⁹ Basic Plan or \$99 ⁹⁹ for Unlimited Plan		
Data Sent or Received ⁷	Included	Included	\$1 ⁹⁹ /MB (or per data package)	\$1 ⁹⁹ /MB (or per data package)		

⁴ Premium and Connect Plans are available on select phones only. Premium Plan is not required on a Family SharePlan second line; if you wish to have a second line on a Family SharePlan with the Connect or Select Plan only, the monthly access will be \$10 or \$20 less, respectively. Connect Plan is not required on a Family SharePlan second line; if you wish to have a second line on a Family SharePlan with the Select Plan only, the monthly access will be \$10 less. VZ Navigator and Mobile Email must be downloaded to your device via *Get It Now*™/Media Center. Additional terms and conditions, which you will be required to accept to download the applications, apply. If you do not download the applications or if you delete any of the applications, your monthly access will not be reduced. If you change devices, you will need to download the applications to your new device. If you change from a Nationwide Premium Plan or Connect Plan to another plan, you will be billed the monthly charge for VZ Navigator and Mobile Email, as applicable (if you downloaded the applications), until you cancel these subscriptions from your device.

⁵ Applies when sending and receiving (i) Text, Picture and Video Messages with Verizon Wireless

and non-Verizon Wireless customers in the United States; (ii) Text, Picture and Video Messages sent via email; (iii) Instant Messages; and (iv) Text Messages with customers of wireless carriers on participating networks in Canada, Mexico and Puerto Rico. International Text Messaging is 20¢ per message received and 25¢ per recipient per message sent. Premium Messaging programs not included. Messaging is available from within the National Enhanced Services Rate and Coverage Area and is not available throughout the Nationwide Rate and Coverage Area.

⁶ Nationwide Unlimited Anytime Minute Plans are not eligible for any monthly access discounts.

Friends & Family: Only calls from Nationwide Coverage Area to and from designated domestic landline or wireless numbers (excluding Directory Assistance, 900 numbers, customer's own wireless or Voice Mail access numbers, or access gateways to and from other providers' voice or data communications systems) included; all qualifying lines on an account share the same Friends & Family numbers, up to account's eligibility limits; My Verizon required to set up and manage Friends & Family numbers. Coverage varies by service and is not available everywhere.

Do more with data.

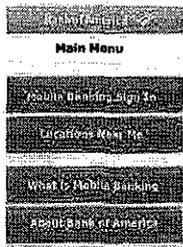
Download the world. Get email, the web, games, apps and more for your phone.

Data packages from Verizon Wireless open up a world of possibilities. You can get more done and have more fun with your phone. Check your email, surf the web and download apps, games, Ringtones and more. No matter what you want to do, we've got a data package that fits your life.

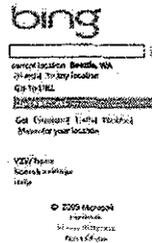
Here's what you can do:

- Download the latest apps, games, Ringtones and more.
- Browse the web.
- Check email on the go.

Plus, access tons of cool apps like these:



Coming soon! **Bank of America*** This app makes Mobile Banking from Bank of America more convenient than ever. Get one-touch access to the Mobile Banking sign-in screen, and use the locator feature to find ATMs and banking centers right from your phone – no address input required.



Bing.com

Get free maps and local business listings right on your phone when you need them. Quickly find nearby services. Local restaurants, movie theaters, businesses and directions to get there are at your fingertips with Bing™ for mobile.

Data Packages

Monthly Allowance	Phones Monthly Access	Per-MB Rate After Allowance
25 MB	\$9 ⁹⁹	50¢
75 MB	\$19 ^{99†}	30¢

Pay As You Go (Not available on Enhanced Multimedia phones)

Per-MB Rate \$1⁹⁹

Monthly Use Example

	Pay As You Go @ \$1 ⁹⁹ /MB	25 MB @ \$9 ⁹⁹
Mobile Web (view approximately 100 pages)	3.0 MB	3.0 MB
VZ Navigator (initial download)	2.0 MB	2.0 MB
PAC-MAN by Namco game	0.3 MB	0.3 MB
Tetris® game	0.3 MB	0.3 MB
Spanish Translator	0.2 MB	0.2 MB
Three Ringtones	0.6 MB	0.6 MB
Total Megabytes (rounded up to the nearest MB)	7.0 MB	7.0 MB
Estimated Cost	\$13 ⁹⁹	\$9 ⁹⁹

Additional Information

To find out which phones require a data package, please see page 4 or visit verizonwireless.com/phones. For more information, please visit verizonwireless.com/data

The above examples are just estimates, based on approximate size assumptions. Actual file sizes and user experiences will vary.

Data Features and Capabilities:

Mobile Email^A

Receive emails right on your phone.

- * Get alerts when new messages arrive and view picture attachments.⁴
- * Works with popular Internet-based email accounts, including Yahoo!® Mail, AOL® Mail, Gmail®, Windows Live and Verizon.net.
- * Available in English and Spanish.⁴
- * Text EMAIL to 2777 (APPS) to get Mobile Email.

Service

Mobile Email
(For phones)

\$5
Monthly Charge
(plus data charges)

Email and Web for BlackBerry Email and Web for Smartphone

View email and surf the web on your BlackBerry device or smartphone.

- * Works with popular Internet-based email accounts, including Yahoo! Mail, AOL Mail, Gmail®, Windows Live and Verizon.net.

Email and Web for BlackBerry Email and Web for Smartphone

- * Unlimited email and web
- * Feature added to Nationwide Plans
(For Nationwide Plan Included features, see page 12.)

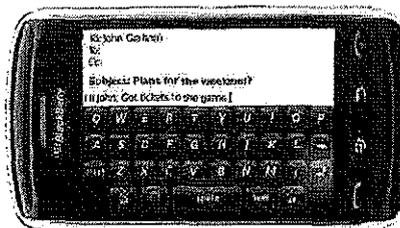
\$29⁹⁹
Monthly Charge

Mobile Web

Take the Internet with you wherever you go. Surf your favorite sites right on your phone.

Get It Now/Media Center

Download the latest applications – like games, Ringtones, Ringback Tones and wallpaper – at *Get It Now/Media Center*.



BlackBerry® Storm™

CDMA Data Roaming

- * Data sent or received in Canada is billed at \$0.002 per KB or \$2⁰⁵ per MB.
- * Data sent or received in Mexico is billed at \$0.005 per KB or \$5¹² per MB.

Required Equipment

- * CDMA BlackBerry device or select smartphones with Verizon Wireless software required.

VZAppZone™

Get more from your select BlackBerry device or smartphone with VZAppZone™. Have your game, Ringtone and other application purchases billed directly to your account.

Visit verizonwireless.com/vzappzone

^A Mobile Banking is not available with accounts in Washington and Idaho. Application is available for BlackBerry devices with an Operating System of 4.2 or higher.
¹ May also be available on other devices.
² Mobile Email is available only in the National Enhanced Services Coverage Area and the Verizon Wireless Prepaid Rate and Coverage Area and only on select devices. Prepaid subscribers will need to opt into Mobile Email every month. The application will not automatically renew. Not compatible with all Internet service provider service offerings. Supports up to 10 email accounts. Send and receive plain text emails, with attachment indicator, only. Downloading the Mobile Email application will require approximately 2 MB of data. Application not available on all devices. Picture attachment support is available for .jpg, .gif and .png. Pictures will be downsized to fit mobile device display. Email services that offer a POP- or IMAP-based connection are supported.
⁴ Spanish and viewing of attachments are available only on select devices.

Fall 2009

America's Largest and Most Reliable V

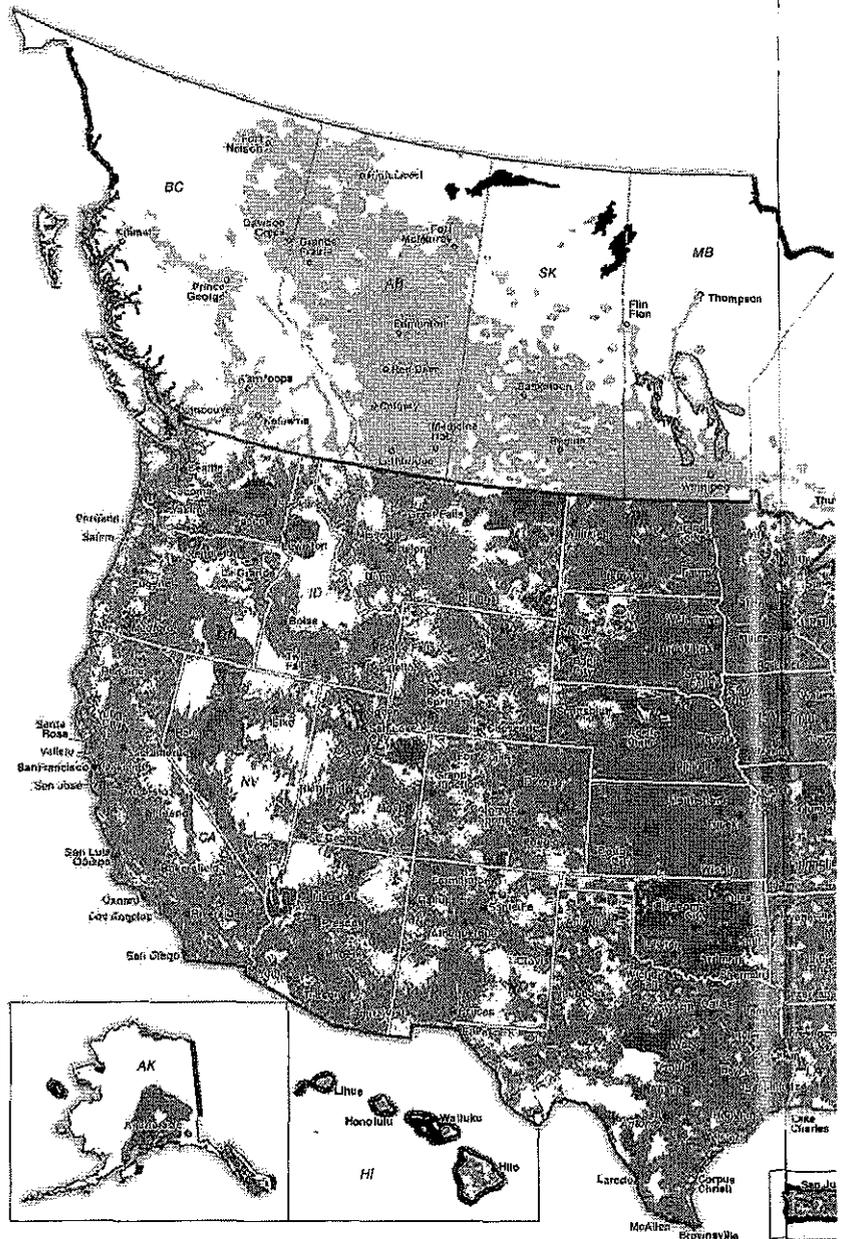
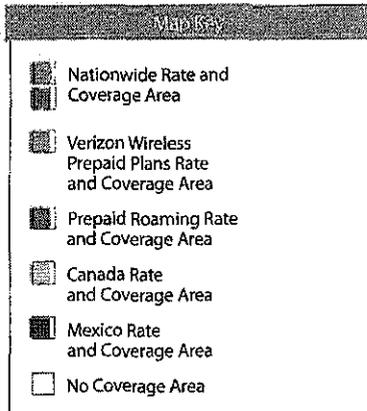
Making sure our more than 80 million customers stay connected is a big job. But we're up to the task.

We do whatever it takes.

On average, we invest about \$1 billion every 60 days in network improvements that provide our customers with even better voice and data services.

We're always testing.

Real-life Test Men and Women drive 1 million miles a year, making 3 million voice-call attempts and more than 16 million data tests annually on our network and other carriers' networks.



America's Largest and Most Reliab

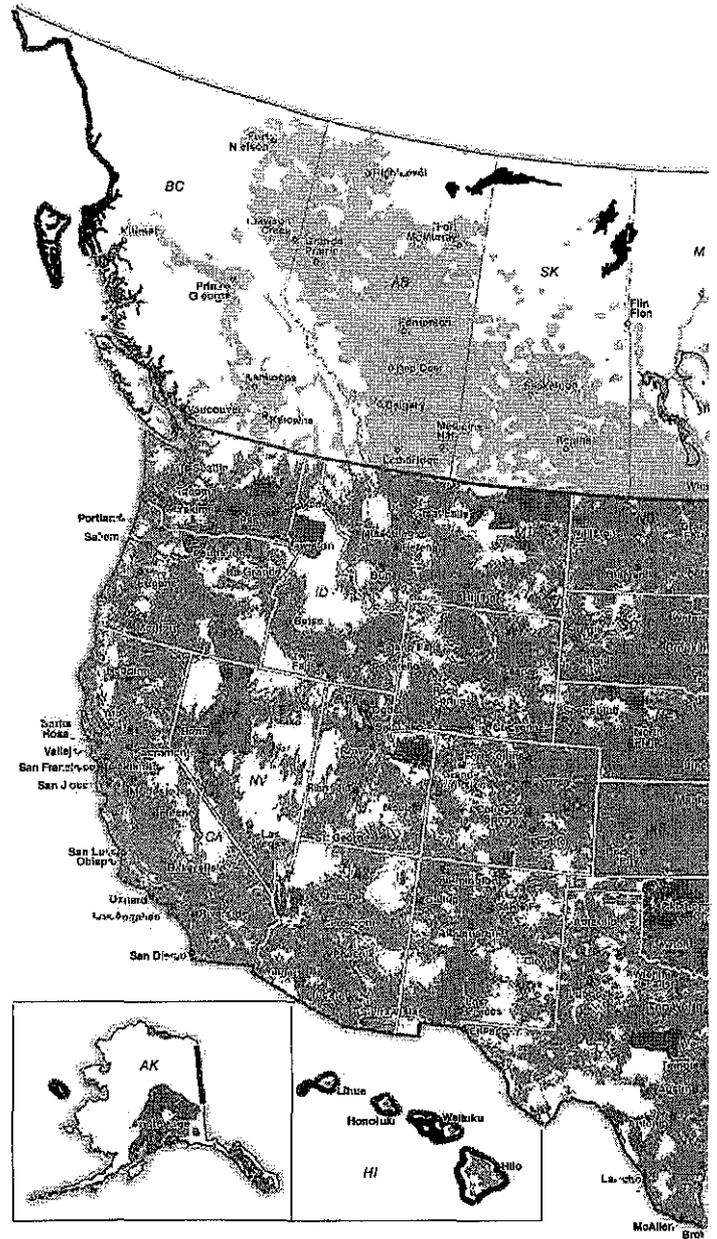
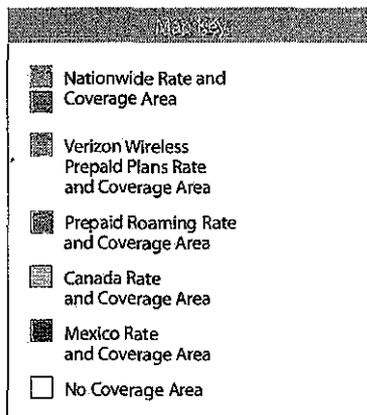
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e Wireless Network

Options

Enhance your plan with options that suit your life.

See where your next call is coming from with City ID.*

City ID is an enhanced Caller ID application that automatically identifies and displays the city and state for every incoming and outgoing call. City ID is preloaded on select devices and includes more than 20,000 locations in North America and 200 countries. Try it free for 15 days, and then pay just \$1⁹⁹ per month or an unlimited subscription of \$34⁹⁹ per line.

Bring loved ones closer to you.

Verizon Wireless makes it easy to keep in touch – even when family and friends are on the other side of the country. Add lines of service to your Family SharePlan, and your loved ones can get a phone with your local area code, so you don't have to worry about long-distance charges.

Get employee discounts.

You may be eligible for an employee discount based on where you work. Visit verizonwireless.com/getdiscount for details.

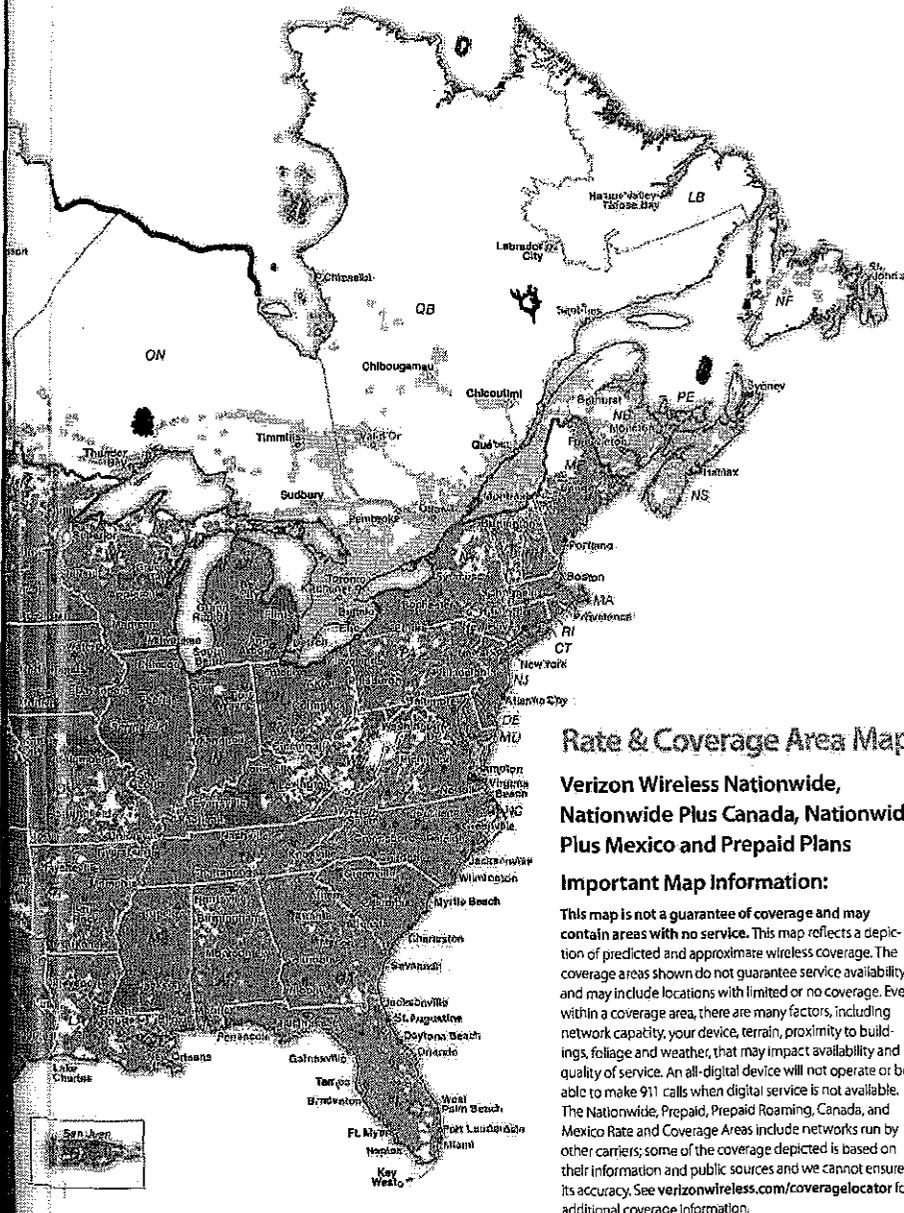
Nationwide Messaging Plans make calling easier for those with special needs.

We have plans designed specifically for our deaf or hard-of-hearing customers.

- Plans include Unlimited Messaging to anyone on any network in the U.S.
- Rates start as low as \$34⁹⁹ monthly access.

Visit aboutus.vzw.com/accessibility

* Not compatible when incoming calls initiate Caller ID Block and only available in limited areas and on specific devices. Customers will be prompted to buy the City ID application after the fifth incoming call and on day 15 of the free trial. Customers who purchase the \$34⁹⁹ option and then cancel City ID will not receive a credit for the feature unless they contact Customer Service and request a credit.



Rate & Coverage Area Map

Verizon Wireless Nationwide, Nationwide Plus Canada, Nationwide Plus Mexico and Prepaid Plans

Important Map Information:

This map is not a guarantee of coverage and may contain areas with no service. This map reflects a depiction of predicted and approximate wireless coverage. The coverage areas shown do not guarantee service availability and may include locations with limited or no coverage. Even within a coverage area, there are many factors, including network capacity, your device, terrain, proximity to buildings, foliage and weather, that may impact availability and quality of service. An all-digital device will not operate or be able to make 911 calls when digital service is not available. The Nationwide, Prepaid, Prepaid Roaming, Canada, and Mexico Rate and Coverage Areas include networks run by other carriers; some of the coverage depicted is based on their information and public sources and we cannot ensure its accuracy. See verizonwireless.com/coveragelocator for additional coverage information.

Plans

Nationwide Plus Canada & Nationwide Plus Mexico Plans

Your life doesn't stop at the border. Neither should your wireless plan.

Nationwide Plus Canada Plans

- Unlimited National Mobile to Mobile Calling Minutes while in the U.S. (including Puerto Rico)
- Unlimited Long Distance to the U.S. (including Puerto Rico) and Canada (airtime charges apply)
- 1000 Night & Weekend Minutes in the U.S. and Canada
- Mobile Web*

Nationwide Plus Mexico† Plans

- Unlimited National Mobile to Mobile Calling Minutes while in the U.S. (including Puerto Rico)
- Unlimited Long Distance to the U.S. (including Puerto Rico) and Mexico (airtime charges apply)
- 1000 Night & Weekend Minutes in the U.S. and Mexico
- Mobile Web*

Get all the benefits of these plans, plus the cost savings and convenience of Friends & Family. See page 10 for details. Friends & Family can be used only while in the U.S., with other U.S. phone numbers.

Additional Information

Anytime Minutes, Night & Weekend Minutes and Per-Minute Rate are for use within the Nationwide Plus Canada or Nationwide Plus Mexico Rate and Coverage Areas, as applicable. National Mobile to Mobile Calling Minutes are for domestic calls from within the Nationwide Rate and Coverage Area. Roaming in Canada outside of the Nationwide Plus Canada Rate and Coverage Area is 69¢ per minute. For included features, see page 12. For Additional Plan Information, see page 44. For more details, see the map on pages 16-17 and the Important Information and Additional Coverage Map section in the back of this brochure.

- * Data package of \$99 or higher, or Nationwide Premium or Connect Plan, required for Enhanced Multimedia phones. All Windows Mobile, Palm and BlackBerry smartphones require a data feature of \$299 or higher, or a data plan. Data sent or received in Canada is billed at \$0.002/KB or \$299/MB. Data sent or received in Mexico is billed at \$0.005/KB or \$549/MB.
- † Plan requires International Dialing (I-Dial) capability on your account, which is subject to a minimum payment history. Verizon Wireless will terminate your service for good cause if less than half of your voice calls over three consecutive billing cycles are from within the Nationwide Rate and Coverage Area.
- ‡ Unlimited Mobile to Mobile Calling does not apply while in Canada or Mexico.



Nationwide Plus Canada & Nationwide Plus Mexico Single-Line

Nationwide Plus Canada Monthly Access	\$59 ⁹⁹	\$79 ⁹⁹	\$99 ⁹⁹	\$119 ⁹⁹	\$169 ⁹⁹	\$219 ⁹⁹
Nationwide Plus Mexico Monthly Access	\$54 ⁹⁹	\$74 ⁹⁹	\$94 ⁹⁹	\$114 ⁹⁹	\$164 ⁹⁹	\$214 ⁹⁹
Monthly Anytime Minutes	450	900	1350	2000	4000	6000
Friends & Family <small>Pick 5 friends</small>	-	✓	✓	✓	✓	✓
No roaming charges in the U.S. or long-distance in U.S. and Canada on Nationwide Plus Canada Plans; no roaming or long-distance charges in the U.S. and Mexico on Nationwide Plus Mexico Plans.						
Night & Weekend Minutes <small>Night hours: (Mon-Fri) 9:01 p.m. - 5:59 a.m. Weekend hours: (Sat-Sun) 12:00 a.m. - 11:59 p.m.</small>	1000					
National Mobile to Mobile Calling Minutes	Unlimited ^a					
Per-Minute Rate After Allowance	45¢	40¢	35¢	25¢	25¢	20¢
Data Sent or Received*	\$1 ⁹⁹ /MB (or per data package)					

Nationwide Plus Canada & Nationwide Plus Mexico Family Share Plan

Nationwide Plus Canada Monthly Access for first two lines	\$89 ⁹⁹	\$109 ⁹⁹	\$129 ⁹⁹	\$169 ⁹⁹	\$219 ⁹⁹	\$319 ⁹⁹
Nationwide Plus Mexico Monthly Access for first two lines	\$84 ⁹⁹	\$104 ⁹⁹	\$124 ⁹⁹	\$164 ⁹⁹	\$214 ⁹⁹	\$314 ⁹⁹
Shared Monthly Anytime Minutes	700	1400	2100	3000	4000	6000
Friends & Family <small>Pick 10 friends</small>	-	✓	✓	✓	✓	✓
No roaming charges in the U.S. or long-distance in U.S. and Canada on Nationwide Plus Canada Plans; no roaming or long-distance charges in the U.S. and Mexico on Nationwide Plus Mexico Plans.						
Shared Night & Weekend Minutes <small>Night hours: (Mon-Fri) 9:01 p.m. - 5:59 a.m. Weekend hours: (Sat-Sun) 12:00 a.m. - 11:59 p.m.</small>	1000					
Shared National Mobile to Mobile Calling Minutes	Unlimited ^a					
Per-Minute Rate After Allowance	45¢	40¢	35¢	25¢	20¢	20¢
Monthly Access Per Additional Line (Up to 3)	Add a Line \$9 ⁹⁹					
Data Sent or Received*	\$1 ⁹⁹ /MB (or per data package)					

Nationwide 65 Plus Plans

With Verizon Wireless, you can keep it simple.

- Unlimited National Mobile to Mobile Calling Minutes
- Available to customers 65 or older
- Mobile Web*



Does not apply to service.

Samsung Knack™ (While supplies last)

The Samsung Knack is easy to use, with large, readable keys. Just press one button to speed-dial the numbers you call most. And it's simple to set up the In Case of Emergency (ICE) key with your top emergency contacts. It also comes with an easy-charging desktop cradle.

Features

- Speakerphone
- Easy-to-read menu with large lettering

Capabilities⁴

- Text Messaging



Nationwide 65 Plus	Single-Line Plan	Two-Line Plan ¹
Monthly Access	\$29 ⁹⁹	\$59 ⁹⁹
Monthly Anytime Minutes	200	-
Shared Monthly Anytime Minutes	-	450
No Domestic Roaming or Long-Distance Charges.		
Night & Weekend Minutes <small>Night hours: (Mon-Fri) 9:01 p.m. - 5:59 a.m. Weekend hours: (Sat-Sun) 12:00 a.m. - 11:59 p.m.</small>	500	-
Shared Night & Weekend Minutes <small>Night hours: (Mon-Fri) 9:01 p.m. - 5:59 a.m. Weekend hours: (Sat-Sun) 12:00 a.m. - 11:59 p.m.</small>	-	1000
National Mobile to Mobile Calling Minutes	Unlimited	
Per-Minute Rate After Allowance	45 ^c	
Data Sent or Received*	\$1 ⁹⁹ /MB (or per data package)	

* Data package of \$9⁹⁹ or higher, or Nationwide Premium or Connect Plan, required for Enhanced Multimedia phones. All Windows Mobile, Palm and BlackBerry smartphones require a data feature of \$29⁹⁹ or higher, or a data plan.

¹ Two lines maximum.

⁴ Additional charges may apply when using certain capabilities.

Knack is a trademark of Verizon Wireless.

Phones subject to availability. Selection may vary.

Talk with your hands.

Send a picture, text a note or get animated with character messages. It's your choice.

Connect your way.

Text, Picture and Video Messaging is a fast and easy way to stay connected.

- Snap and send pictures.
- Shoot/send up to 60 seconds of video.
- Use the driver-friendly message reply with Voice Message to record up to 60 seconds of your voice to respond to calls you receive on the road.*
- 20¢ per text message sent (per recipient) or received (including Canada, Mexico and Puerto Rico).
- 25¢ per picture and video message sent (per recipient) or received (including Canada, Mexico and Puerto Rico).
- Basic Messaging† is only a \$5 monthly charge for 250 messages.

verizonwireless.com/messaging

Messaging Bundles

Unlimited Text, Picture & Video Messages

With more than 80 million Verizon Wireless customers.

\$10 Monthly Charge	=	Unlimited Mobile to Mobile Messaging	+	500 Additional Messages ^a
\$15 Monthly Charge	=	Unlimited Mobile to Mobile Messaging	+	1500 Additional Messages ^a
\$20 Monthly Charge	=	Unlimited Mobile to Mobile Messaging	+	5000 Additional Messages ^a

^a Always applies when sending and receiving Instant Messages. Also applies when sending Text Alerts and Text, Picture and Video Messages: (i) with non-Verizon Wireless customers in the United States and on participating networks in Canada, Mexico and Puerto Rico; and (ii) via email. Premium Messaging programs not included. Overage Rate is 10¢ per message sent (per recipient) or received for Text/Picture/Video Messages.

Unlimited Mobile to Mobile Messaging with other Verizon Wireless customers from within the National Enhanced Services and Extended National Enhanced Services Rate and Coverage Areas. Text, Picture and Video Messaging is not available throughout the Nationwide Rate and Coverage Area. Instant Messages are not included as Mobile to Mobile Messages in any Unlimited Mobile to Mobile Messaging plan.

Additional Information

For additional details, see the Important Information and Additional Coverage Map section in the back of this brochure.

* Users can also send a voice message by creating a sound within a Picture Message; Picture Message rates apply.

† Premium Messaging programs and Mobile to Mobile Messaging not included. Overage Rate is 10¢ per message sent (per recipient) or received for Text/Picture/Video Messages.

[‡] Standard messaging rates apply. Additional premium rates apply to picture alerts (which you will be required to accept before enrolling).

[§] Message charges will be billed to recipients. There is no charge to send an animated message through verizonwireless.com/animatedmessaging; however, airtime or data usage will apply when sending animated messages through Mobile Web on your device.

Some short codes carry premium charges, which you'll be prompted to accept before subscribing and sending. Opt out of a program by texting "stop" to the code. Additional charges apply for international messages.

Store your pictures.

Save up to 75 pictures free of charge or get unlimited storage for pictures and videos for only \$1⁹⁹ per month.

• Order prints – and gifts like mugs, albums and postcards – and have them delivered or pick them up.

• Customize pictures with Fun Effects.

verizonwireless.com/picture

IM from your device.

With Mobile IM,[§] have full IM conversations on AIM®, Yahoo! and Windows Live Messenger™ just like on your PC. The application is preloaded on most devices and is now available on select BlackBerry devices and smartphones. Standard messaging rates apply. verizonwireless.com/IM

Stay informed.

Receive fast, timely and automatic alerts,[§] including AMBER alerts, sports scores and weather. verizonwireless.com/alerts

Make your messages move.

Send cool animated character messages with Animated Messaging![§] Just choose a character and the text you want it to say and send your message to any email address or Verizon Wireless mobile phone number.

verizonwireless.com/animatedmessaging

Plans

Prepaid Plans

Just pay on the days you use it.

- * Expanded coverage area. See the map on pages 16–17 for details.
- * Variety of plans available to fit your lifestyle and budget.
- * Unlimited Nights and Weekends are included in the Prepaid Plus Plan.
- * No long-term contracts, deposits or credit checks.

Verizon Wireless Prepaid Plans	Prepaid Unlimited Talk	Prepaid Plus	Prepaid Core	Prepaid Basic
Daily Access (Only on days used)	\$3 ⁹⁹	\$1 ⁹⁹	99¢	
Mobile to Mobile Calling (With Verizon Wireless customers)	Unlimited	Unlimited	Unlimited	25¢ per minute
Night & Weekend Minutes (Per-minute)	Unlimited	Unlimited	10¢	20¢ per text message
Each Additional Minute (For all other calls)	Unlimited	5¢	10¢	
Text Messaging Rates (Per message sent (per recipient) and received)	1¢	5¢	10¢	

Messaging Bundles

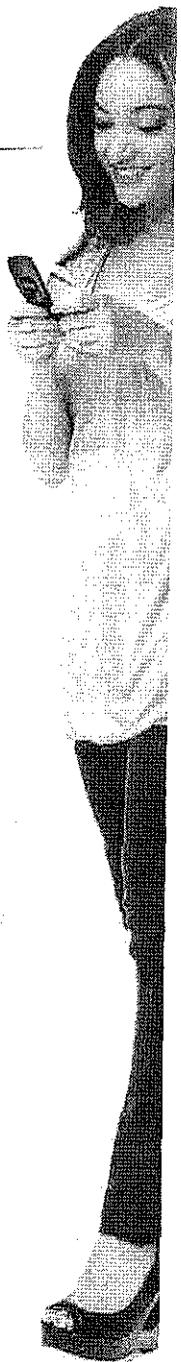
Unlimited Text, Picture & Video Messages

\$10 Per Month = Unlimited Mobile to Mobile Messaging + 250 Additional Messages*
with more than 80 million Verizon Wireless customers

\$20 Per Month = Unlimited Messaging* to anyone on any network in the U.S.

* Additional and Unlimited Messages apply when sending and receiving: (i) Instant Messages, Text Alerts, and Picture and Video Messaging Portal Messages; (ii) Messages with non-Verizon Wireless customers in the United States or participating networks in Canada, Mexico and Puerto Rico; or (iii) via email. Unlimited Messages also include Mobile to Mobile Messages with Verizon Wireless Customers. For Additional Messages, overage Messaging rates default to those of your Plan. Premium Messaging programs and International Messaging not included.

Unlimited Calling, Mobile to Mobile Calling/Messaging with Verizon Wireless Customers, Night Minutes, Weekend Minutes and Each Additional Minute rates are for domestic calls/messages from within the Verizon Wireless Prepaid Rate and Coverage Area. Night Minutes are from 9:01 p.m. to 5:59 a.m. Weekend Minutes are from 12:00 a.m. Saturday to 11:59 p.m. Sunday. Messaging Rates are per message sent (per recipient) or received from within the U.S. to the U.S., Canada, Mexico and Puerto Rico. Activation fee up to \$25 may apply. Once activated, account balance will expire based on initial payment or in 60 days, whichever is longer. Domestic Long Distance included. Domestic Roaming Per-Minute Rate is 20¢. Detailed Billing and Premium Voice Mail are not available on Verizon Wireless Prepaid Plans. Payment expirations once applied to the account: \$15–\$29⁹⁹ for 30 days; \$30–\$74⁹⁹ for 90 days; \$75–\$99⁹⁹ for 180 days; \$100 or more for 365 days.



Prepaid Plans include the following features:

Unlimited Mobile to Mobile Calling

Connect with more than 80 million Verizon Wireless customers on the Prepaid Unlimited Talk, Plus and Core Plans.

Picture, Video and Voice Messaging

25¢ per message sent (per recipient) or received, including Canada, Mexico and Puerto Rico.

Domestic Roaming

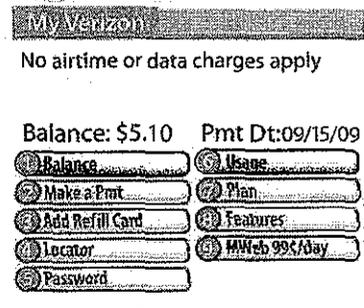
20¢ per minute.

411 Search[†]

Just \$1.49 per call, plus airtime. For more information, please see page 12.

Manage your account on your phone:

My Verizon lets you view your account balance, make a payment, find a payment location, sign up for Auto Pay, manage your features and more.



Additional Information

For more details, see the map on pages 16–17 and the Important Information and Additional Coverage Map section in the back of this brochure.

International Services

Pay as you go – no matter where you go:

International Voice Calling[‡]

Each Additional Minute rate, plus the following surcharges:

- Puerto Rico: no extra charge.
- Mexico: 10¢ per minute to landline numbers; 29¢ per minute to wireless numbers.
- 29¢ per minute to Canada, Guam, Saipan and the U.S. Virgin Islands.
- \$1.49 per minute to other available locations.

International Text Messaging[‡]

25¢ per message sent (per recipient) or as low as 1¢ per message received, depending on your Plan.

International Roaming – Voice Calling[‡]

- 69¢ per minute from Canada, Puerto Rico and the U.S. Virgin Islands.
- 99¢ per minute from Mexico.
- \$1.99 per minute from Bermuda.

International Roaming – Text Messaging[‡]

- 50¢ per message sent (per recipient).
- 5¢ per message received.

Get cool optional services on all Prepaid Plans:

Page 15 **Mobile Email** \$6⁹⁹ for 30 days of service.

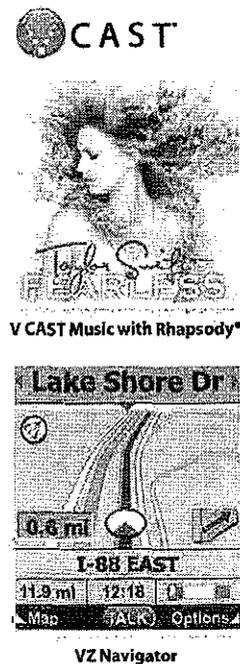
Page 32 **Ringtones,[†] Ringback Tones[†] and MP3s**

Page 33 **V CAST Music with Rhapsody^{®/2}**

Page 36 **VZ Navigator** Just \$2⁹⁹ per day (24-hour period).

Page 37 **Mobile Web** Surf the Internet for 99¢ per day (24-hour period).

Page 39 **Games[†]**



[†]When outside the Verizon Wireless Prepaid Rate and Coverage Area, 411 Search rates, automatic connection and enhanced services may vary.

[‡]Locations and rates subject to change without notice. Unlimited Calling and Messaging Bundles, and Night, Weekend and Mobile to Mobile Minutes do not apply to International Services. Data services and features not available when Roaming. International Roaming coverage only available on participating networks and is not guaranteed. Calling and Messaging to some locations may not be available at all times. For details on International Services, as well as the latest available locations and rates, visit verizonwireless.com/prepaid

[†]Additional charges apply.

²Voice Mail is required for use of Ringback Tones.

²Verizon Wireless Prepaid customers are not eligible for V CAST Music with Rhapsody[®] monthly subscription service, but they can sign up with a credit card on rhapsody.com and sync music to their subscription-capable device or subscription-capable MP3 player.

Connection perfection.

With Verizon Wireless Mobile Broadband, you can work or play in more places than ever before.

- Complement your home Internet connection with Mobile Broadband and stay in touch with your life when you're on the go.
- Check email, send instant messages, download music and videos, or interact with friends on MySpace – all on America's Largest 3G Network, covering more than 90% of the U.S. population.
- Typical download speeds are 600 Kbps to 1.4 Mbps. Upload speeds average 500 to 800 Kbps.*†
- When in Mobile Broadband markets that do not yet have EV-DO Rev. A, you can expect download speeds of 400 to 700 Kbps and upload speeds of 60 to 80 Kbps.†

Visit verizonwireless.com/broadband and verizonwireless.com/broadbandcoverage

Mobile Broadband Plans

(National Access service included)

With a PC Card, ExpressCard, USB Modem, Intelligent Mobile Hotspot or notebook/netbook with Mobile Broadband Built-in.

Which plan is right for you?

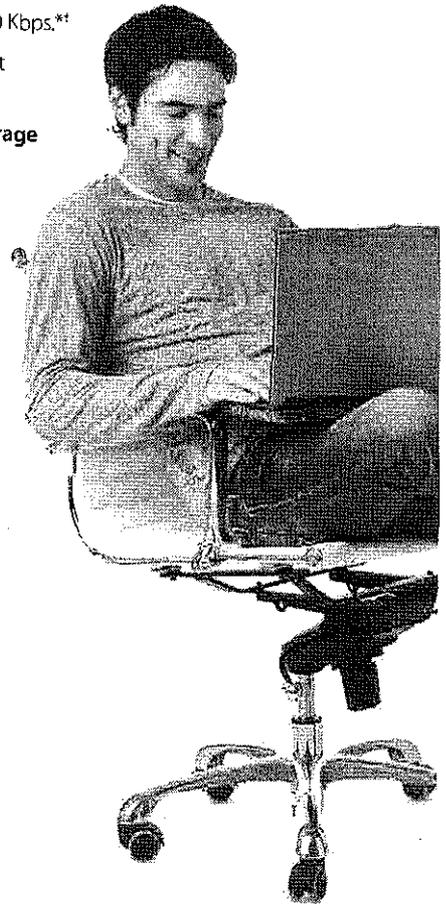
	Light Usage	Heavy Usage
Monthly Access	\$39 ⁹⁹	\$59 ⁹⁹
Monthly Allowance	250 MB	5 GB (5120 MB)
Per-MB Rate After Allowance	10¢	5¢

Approximate Data Usage¹

Activity Type	Approximate Size
Email (1 text page without attachments)	3 KB
Word Document (With 5 text pages)	70 KB
Typical Web Page Lookup	300 KB ²
Low Resolution Digital Photo	500 KB
PowerPoint Presentation (20 pages with text and light graphics)	3 MB
V CAST Music with Rhapsody® PC Download (3-minute song)	4 MB

Please note: 1024 KB = 1 MB; 1024 MB = 1 GB

¹The above examples are just estimates, based on approximate size assumptions. Actual file sizes and user experiences will vary.
²Graphically intense pages or pages with video can exceed 3 MB.



Not ready for a monthly commitment? No problem.

At Verizon Wireless, we know a lot can happen in a day. But you can stay on top of it all – without a monthly commitment – with DAYPASS.¹ For one low price, you get a 24-hour session² of high-speed Internet access. It's the same coverage and speed you expect from Verizon Wireless – minus the commitment. For pricing and additional details, visit verizonwireless.com/daypass

How can I check data usage for my Mobile Broadband device?

You can check your approximate unbilled monthly data usage for your Mobile Broadband device through the following options:³

- VZAccess[®] Manager "Usage" button⁴
- My Verizon or My Business Account
- Have your Mobile Broadband device wireless number available and call **1.800.922.0204**.

Data Roaming

- Data usage within the Canada Rate and Coverage Area will be billed at \$0.002/KB or \$2²⁸/MB.
- Data usage within the Mexico Rate and Coverage Area will be billed at \$0.005/KB or \$5¹⁴/MB.
- In the Aruba, Bermuda, Cayman Islands, China, Dominican Republic, Guam, India, Israel, Jamaica, Saipan and South Korea Enhanced Services Rate and Coverage Areas, usage will be billed at a rate of \$0.02/KB or \$20⁴/MB.
- You must add 1-Dial to your account to roam in many destinations. To add 1-Dial to your account, and for more information on Wireless Data Roaming in Aruba, Bermuda, Canada, the Cayman Islands, China, the Dominican Republic, Guam, India, Israel, Jamaica, Mexico, Saipan and South Korea, call 1.800.922.0204 or visit verizonwireless.com/narooming
- Only the Canada Broadband Rate and Coverage Area supports EV-DO.

Get connected – with ease.

- Take your laptop virtually anywhere with one of our modem devices. Choose from Mobile Broadband PC Cards, USB Modems, ExpressCards or notebooks/netbooks with Mobile Broadband Built-In.
- With the Verizon Wireless MiFi™ 2200 Intelligent Mobile Hotspot, you can connect up to five Wi-Fi-enabled devices through one convenient Mobile Broadband device.

Expanded broadband

GlobalAccess lets you take your laptop more places than ever with expanded Mobile Broadband service abroad. Get access to Internet, email, intranet and applications through global wireless networks in more than 180 destinations, over 50 with 3G speed. See verizonwireless.com/goglobal for pricing.

Included features

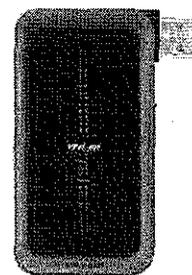
Mobile Broadband Plans include Text Messaging⁵ and New Every Two. Digital service and specific equipment may be required.

Additional Information

For more details about MiFi, see page 9. For Additional Plan Information, see page 44.



Verizon Wireless MiFi™ 2200 Intelligent Mobile Hotspot



AD 3700 USB Modem (GlobalAccess-capable)

²⁸ Speeds require an EV-DO Rev. A-capable device. When using an EV-DO device that is not Rev. A-capable or traveling in the Extended Broadband Services Rate and Coverage Area, you can expect download speeds of 400–700 Kbps and upload speeds of 60–80 Kbps.

¹⁴ Mobile Broadband speed claims based on our network tests with 5 MB FTP data files, without compression. VZAccess Manager will indicate when you're in an EV-DO Rev. A coverage area.

⁴ DAYPASS usage is not available on any PC Cards. Only available on ExpressCards, USB modems, Intelligent Mobile Hotspots and Mobile Broadband Built-In on select notebooks.

² 24 consecutive hours of Mobile Broadband service.

³ There will be a time lag between the end of a data session and the point at which the usage will appear on any of these tools.

⁵ Customers must download the most recent version of VZAccess Manager from vzam.net for this capability. For Windows, version 6.7 or higher. For Mac OS X, version 4.0 or higher. When

using Intelligent Mobile Hotspot, you must connect with the included USB cable to check your usage in VZAccess Manager.

⁵ Not available in some areas. Text Messaging is 20¢ per message sent (per recipient) or received (including messages to and from wireless customers in Canada, Mexico and Puerto Rico). International Text Messaging is 20¢ per message received and 25¢ per recipient per message sent. For PC Card, ExpressCard, USB Modem, Intelligent Mobile Hotspot and Mobile Broadband Built-In notebook/netbook devices, if you don't utilize VZAccess Manager (or an SMS-capable connection manager) you will be billed for text messages that are sent to you, but you will not be able to receive them. When using Intelligent Mobile Hotspot, you must be connected via the provided USB cable to receive text messages; if you are connected via Wi-Fi, you will be billed for text messages that are sent to you, but you will not receive them. Text Messaging Block is available upon request.

Life made easy. With My Verizon.

It's your time and your money. Manage your account however and whenever you want.

Watching the clock – and your budget – isn't always easy. My Verizon can help you save time and money.

Save time.



Switch phones – instantly.

Lost your phone and can't make it to a Verizon Wireless store right now? Easily activate an old phone and don't miss a call. Lost, stolen or damaged phone? If you have Equipment Protection, place a claim online through *My Services > My Phone* and your device will be shipped via overnight delivery.



Transfer your contacts in no time.

Don't lose your contacts. When you register for My Verizon as the Account Owner, we'll waive the monthly charge for Backup Assistant* (a \$1.99 per month value, for each line on your account). See page 41 for more details.



New! Move your media.

When you switch to a new phone, there's no need to spend hours getting back your favorite Ringtones, applications and games. My Media Retrieval helps you do it all online, in minutes. Log on to My Verizon and select *My Services > My Media* to get started.¹



Set some boundaries.

Be sure your kids can access only what you want them to. With Verizon Safeguards available at My Verizon, it's a snap to set up content filters and usage controls, and block unwanted calls, messages and Internet spam.



Find reviews you can use.

Shopping for phones? Don't bother scouring the web for equipment reviews. See how customers like you rate our phones, and leave feedback of your own.



Join Verizon Community Forums.

It's the place where users help other users. Get answers to your questions, tell your stories, exchange tips and more. Start learning and sharing today.

Manage your account on the go – for free.

Can't get to a computer? Get account info right on your phone with My Verizon Handset. Key functions include:

- Check Balance and Usage (minutes, messaging and data)
- Make Payments and Review Last Five Payments
- View Current Plan
- Add or Delete Features
- Manage your Friends & Family numbers

To get My Verizon Handset,² go to: *Menu > Settings & Tools > My Verizon*. (Some handsets may display *My Account*.)

Directions may vary for BlackBerry, smartphones and other devices.



verizonwireless Realtime

My Verizon

Welcome, acctholder Account No. 123456789-00

My Bill

Recent Payments

Current Balance

Payment Due

Call Usage

Details for: 123-456-7890

Share d Usage: 700 Anytime minutes

Estimate

Monthly Allowance: 1400 minutes

Account Services

Auto Pay

Single Sign On

Register now at verizonwireless.com/myverizon

Save money.



Pick your Friends & Family.

Now's the perfect time to visit My Verizon. Manage Friends & Family online, set and change your numbers whenever you want, and get unlimited calling to the people you call most. Anywhere in America. Anytime. Please see page 10 for more details.



Manage your minutes.

My Verizon makes it easy to avoid overage fees. With **Minute Check**,¹ find out if you're using more minutes than your Plan includes. If you are, save money by changing to another plan, now or later. You can change your Plan without extending your contract, and you can even backdate the change to the beginning of your bill cycle.



Get a new phone for less.

With **Annual Upgrade**, sign up for a two-year agreement on a plan of at least \$49⁹⁹ and you can buy a new phone at its promotional price every year with a two-year renewal (upgrade fee may apply). Or log in, click on *My Services > My Phone* and see when you'll be eligible for the *New Every Two* discount. You only have to fulfill 20 months of your 24-month term to take advantage of *New Every Two*.



Pay bills your way.

View or print your bills anytime. Go green and set up **Paperless Billing**. Make one-time payments, or use **Auto Pay** and never worry again about missing a payment.



Track referral rewards.

Introduce us to your friends and you'll both get rewarded.

Get a \$25 Verizon Wireless Rewards Visa[®] Debit Card¹ just for referring new customers to America's Largest and Most Reliable Wireless Network. Visit verizonwireless.com/myverizon for details. Limit 5 per year.



*Subject to specific terms of use. Results may vary based on backup schedule and other factors.

¹ Available to consumer customers only with *Get It Now/Media Center*-capable devices who are enrolled in My Verizon. Standard content charges will apply for all downloads, unless you are retrieving eligible content to a certified like-new replacement device through My Media Retrieval. Airtime or megabyte charges, as applicable, apply for all downloads. Does not apply to business customers, federal/state government customers, national account customers, or PDA and smartphone users.

² There are no airtime or data charges for using these services from the National Financial Services Rate and Coverage Area.

³ See verizonwireless.com/myverizon for details. Minute Check is available for accounts with up to 10 lines that are enrolled in My Verizon.

⁴ Cards are issued by Citibank, N.A., pursuant to a license from Visa U.S.A., Inc., and managed by Citi Prepaid Services. Cards will not have cash access and can be used everywhere Visa Debit Cards are accepted.

Fall 2009

Go global.

Verizon Wireless keeps you connected around the corner and around the world.

Lots of locations

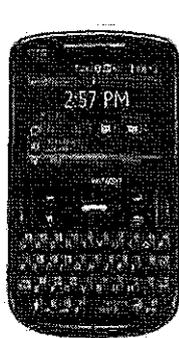
The world is calling. Answer it. With Verizon Wireless, you can call and text in more than 200 destinations. Plus, with more data coverage than ever before, you can email and browse the World Wide Web – around the whole wide world. So before you travel the globe, for business or pleasure, switch to Verizon Wireless, America's Largest Wireless Network. Visit verizonwireless.com/goglobal for details.

One phone

You'll love the convenience of one phone with voice and data services at home and abroad. Choose from a variety of Dual Band and Quad Band GSM and UMTS-capable phones, including BlackBerry devices.

Find your way

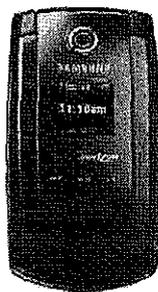
Don't get lost trying to find the must-see sights on your itinerary. The GPS technology of VZ Navigator™ Global* will guide you where you need to go in destinations around the world. See page 36 for more details.



HTC Ozone™

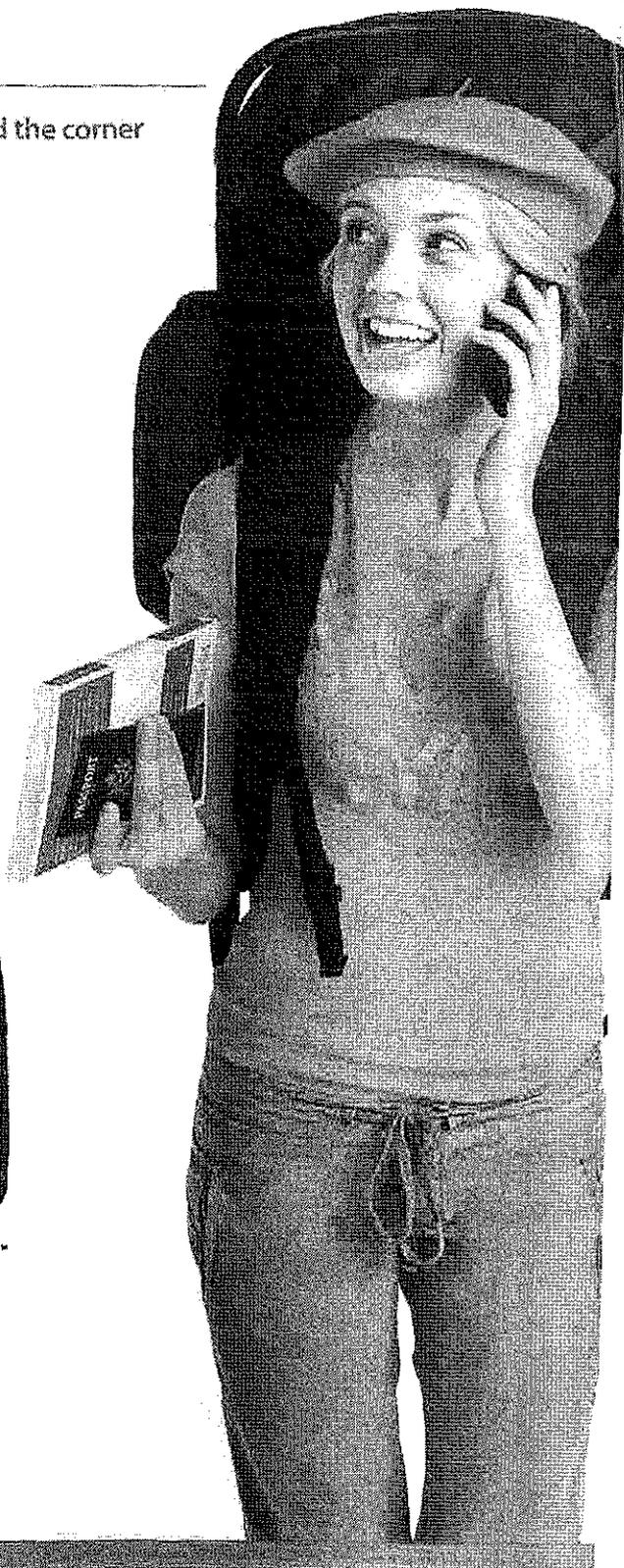


BlackBerry® Storm™



Samsung Renown™

For more information on phones, see pages 2–7.



Here's how it works:

From the U.S.:

It's easy to keep connected. You can use your own phone to call anywhere in the world. (You may need to activate international dialing capability.) International long-distance rates start at 49¢ per minute, plus airtime.

International Long-Distance Value Plan

If you've got friends in faraway places, stay in touch for less. For \$3⁹⁹ monthly access, you'll get rates as low as 6¢ per minute, plus airtime, for calls from your Home Rate and Coverage Area.

International Messaging

Send text messages to family and friends in more than 120 destinations for just 25¢ per recipient or receive a message for 20¢. Picture and video messaging to select destinations is 50¢ per message per recipient to send or 25¢ per message to receive. Visit verizonwireless.com/internationalmessaging



You get the best!

Global Traveler readers gave us the magazine's GT Tested Award, the most sought-after recognition of excellence in business travel.

Outside the U.S.:

Global Phone offers the convenience of reliable, consistent voice service at home and abroad, so you can stay in touch as you travel the globe.¹ Check out the benefits:

- One phone, with voice coverage in more than 220 destinations around the world.
- One number, no matter where you are.
- One bill, for both domestic and international calls.

Global Value Plan

Get discounted rates in more than 150 destinations for just \$4⁹⁹ per line per month.

Messaging around the world

No time to call? No worries. You can send text messages while traveling the world. Rates are 50¢ per message sent (per recipient) and 5¢ per message received. Picture and video messaging² is 50¢ per message per recipient to send and 25¢ per message to receive, plus global data roaming charges.

Start cruising

With our Cruise Ship Service, you can call loved ones from international waters while on 17 major cruise lines, including Carnival®, Disney and Royal Caribbean®, for \$2⁴⁹ per minute.

How to go global:

	With any Verizon Wireless Phone	With an Enhanced Global Phone	
		Occasional Global Traveler ³	Purchase a Global Capable Device ⁴
How It Works	Use your phone in more than 40 popular destinations worldwide, including Canada, China, India, Brazil, the Dominican Republic and the Bahamas, while roaming.	Use our Global Travel Program for occasional travel abroad in most overseas locations. Wireless voice- and data-capable devices are available.	Get a global phone, BlackBerry device or modem device for wireless service in the U.S. and in more than 220 destinations worldwide. ¹
Cost		Voice rates as low as 69¢ per minute For a complete list of destinations and rates, visit verizonwireless.com/goglobal	
Sign Up	1.800.922.0204	1.800.711.8300	1.800.2 JOIN IN

International Dialing should be added to account prior to calling or roaming internationally. Selection may vary. Phones subject to availability. In order for your global phone to work while traveling in GSM/UMTS destinations, you must have a SIM card and you must have global capabilities on your account.

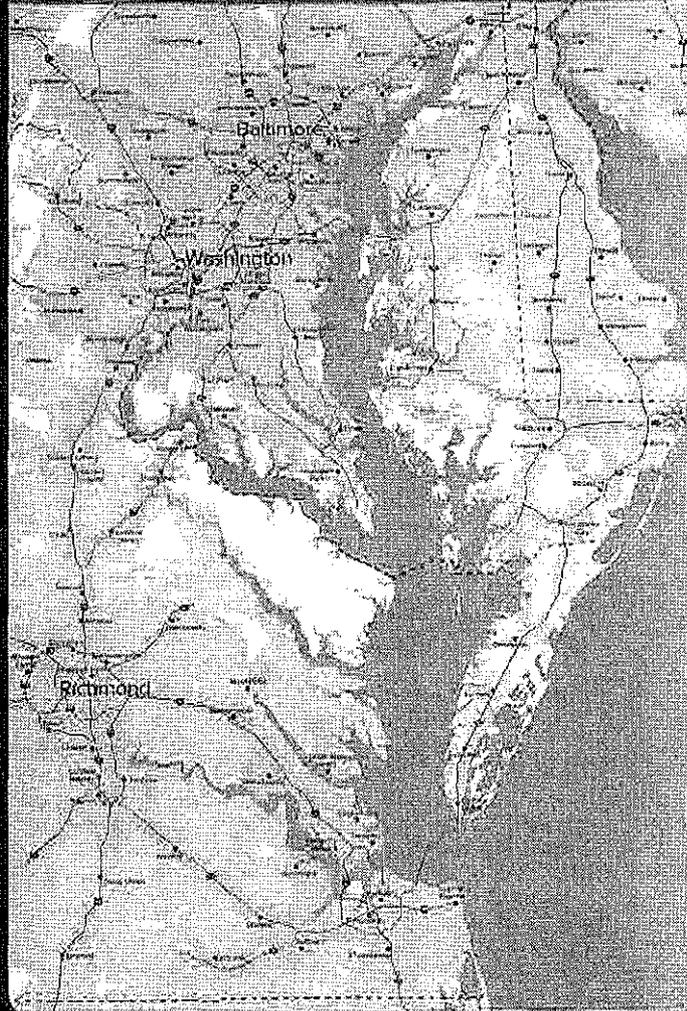
Global Services require credit approval.
^{*} Available on select global-capable devices.
[†] Service may be restricted without notice. Coverage limitations and maps available at verizonwireless.com/goglobal
² In addition to the pay-per-message rates, global data roaming rates also apply: Canada -- \$0.002/KB or \$2⁹⁹/MB; Mexico -- \$0.005/KB or \$5⁹⁹/MB; all other destinations -- \$0.02/KB or \$20⁴⁹/MB. See the Business brochure for more details on global data roaming charges.
³ Certain restrictions apply.
⁴ Data availability in more than 180 international destinations with a GSM Quad Band/UMTS device.

**Attachment A -
Materials Available at Cricket**

cricket coverage

cricket te cubre

LOCAL



-  excellent unlimited coverage area
excelente área de cobertura ilimitada
-  good unlimited coverage area
buena área de cobertura ilimitada
-  premium extended coverage area
área de cobertura extendida premium
-  nationwide roaming
roaming nacional
-  no coverage
sin cobertura

cricket
wireless

The coverage map shows the scope of the calling areas. Maps depict an approximation of service coverage. Actual coverage area may differ substantially from map graphics and may be affected by such things as terrain, weather, foliage, buildings, signal strength, customer equipment and other factors. Coverage indoors may also vary. Cricket does not guarantee coverage. Los mapas muestran el alcance de las áreas de cobertura. Los mapas representan una aproximación de la cobertura del servicio. El área de cobertura real puede diferir sustancialmente de las gráficas del mapa y la cobertura puede ser afectada por factores tales como el terreno, clima, vegetación, edificios, potencia de señal, equipo del cliente y otros. La cobertura en interiores puede variar. Cricket no garantiza la cobertura. © 2009 Cricket Communications, Inc. 2542BS 6/09

cricket has you covered

cricket te cubre

UNLIMITED CALLING FROM OUR EXPANDING NETWORK
LLAMADAS ILIMITADAS DESDE NUESTRA RED EN EXPANSIÓN



unlimited coverage area

Some restrictions apply.



premium extended coverage area

Some restrictions apply.



nationwide roaming

Some restrictions apply.



no coverage

Some coverage areas require a landline phone.
Ask a sales representative for more details.

©2008 Cricket Wireless. All rights reserved. Cricket Wireless is a registered trademark of Cricket Wireless. Cricket Wireless is not responsible for any damage to your phone or other equipment.

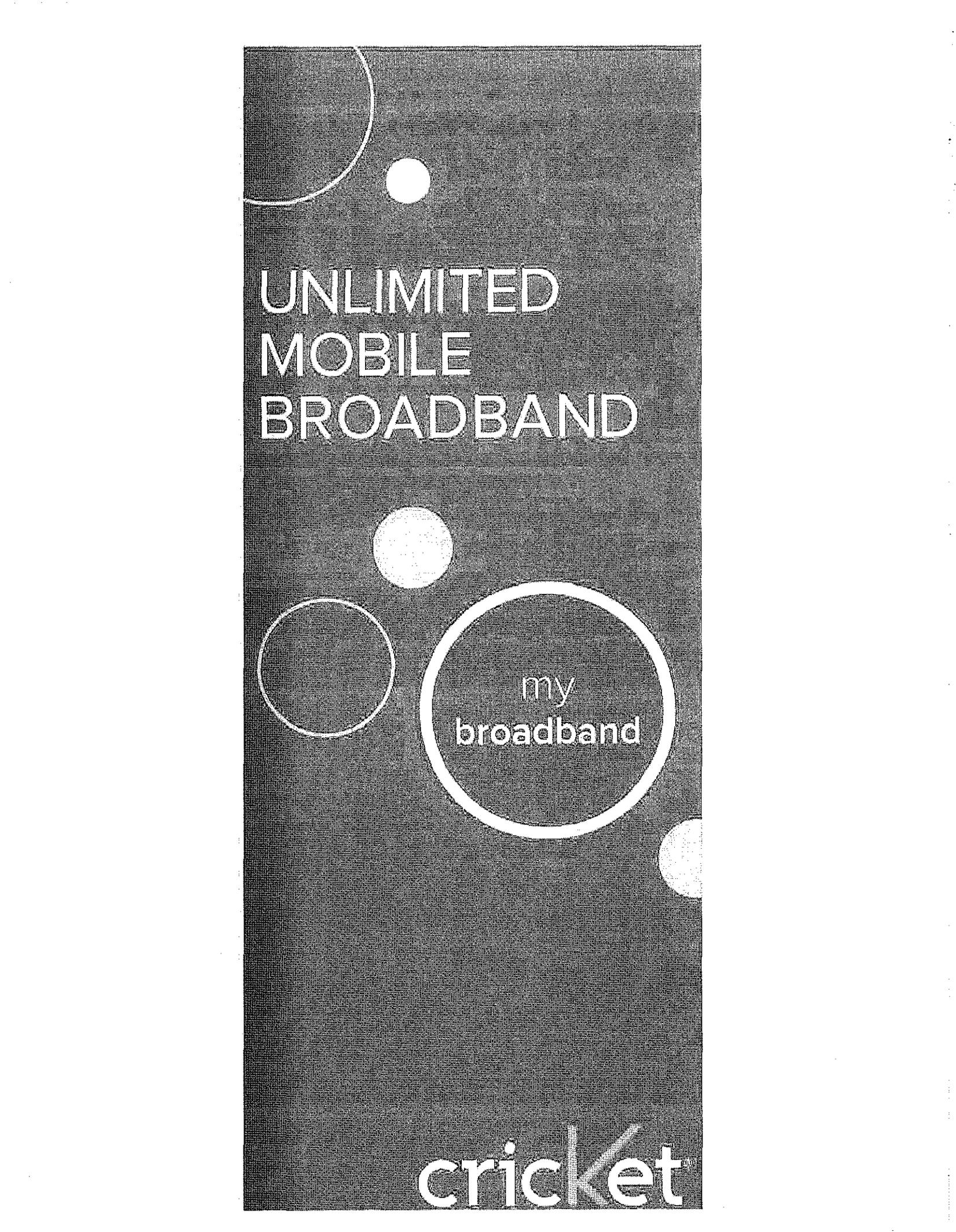
FAQS

what is premium extended coverage? This feature expands your Cricket unlimited coverage to more than 40 additional cities throughout the country. Even though you are outside of a Cricket coverage area, you will still have unlimited service as if you were in your home calling area. Premium extended coverage is included in all new rate plans \$50 and higher or can be added for just \$5/mo to other rate plans.

PREGUNTAS FRECUENTES

¿qué es la cobertura extendida premium? Esta función extiende tu cobertura ilimitada de Cricket a todo el país. Aunque te encuentres fuera de un área de cobertura de Cricket, aún así tendrás servicio ilimitado como si estuvieras en casa. La cobertura extendida premium se incluye en todos los planes de tarifa de \$50 y superiores o puede agregarse por tan solo \$5/mes.

cricket
wireless



UNLIMITED
MOBILE
BROADBAND

my
broadband

cricket[™]

3

WILL CRICKET BROADBAND WORK ON MY COMPUTER?

CRICKET BROADBAND WORKS WITH DESKTOP AND LAPTOP COMPUTERS. If you have a computer with a standard USB port, then it'll work. Cricket Broadband's advanced modems work with both PC & Mac computers and are compatible with Windows 2000®, Windows XP®, Windows Vista® (32 and 64 bit) and Mac OS® 10.3.9 or higher.* So you can use Cricket Broadband to surf the Internet whenever you want, wherever you go.

*Device: Features and compatibility will vary by device.

IS CRICKET BROADBAND REALLY ONLY \$40/MONTH?

YES — ONLY \$40/MONTH. You get unlimited Internet access 24/7. And unlike some of our competitors, Cricket Broadband has no overage fees and no signed contracts. So you can shop, surf, get news, sports scores, check email and more without ever having to worry about your bill. **IT'S ALWAYS THE SAME ONE LOW, FLAT, MONTHLY RATE.**

4

HOW DO I PAY FOR MY CRICKET BROADBAND INTERNET SERVICE?

Not only is Cricket Broadband affordable, we even make it easy to pay your monthly bill, giving you many options.

Credit or debit card

Automatic bill pay

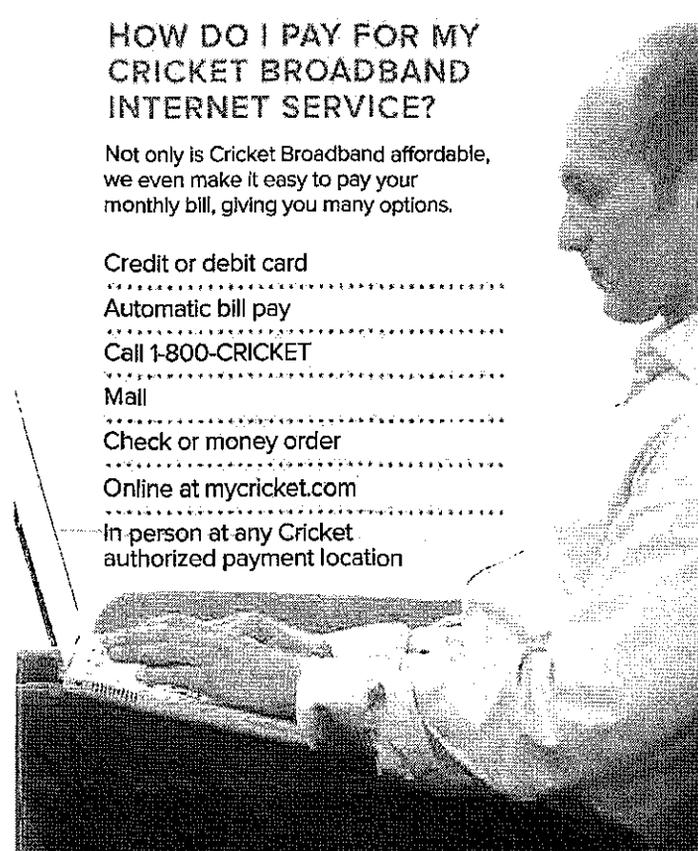
Call 1-800-CRICKET

Mail

Check or money order

Online at mycricket.com

In-person at any Cricket authorized payment location



BUNDLE WITH A CRICKET VOICE PLAN & SAVE

Make a great deal even better. Save \$5 every month when you bundle your Cricket Broadband with a Cricket Wireless plan. With Cricket Wireless, you get the same unlimited 24/7 coverage for one low monthly rate with no overages, no surprises, and no contracts to sign. How can you beat a deal like that?

Throughput speed may be limited if usage adversely impacts our network, service levels or exceeds 5 GB per month.
Limited time offer, subject to change. Terms, conditions & other restrictions apply. 3G and unlimited coverage not available everywhere, coverage maps at mycricket.com. Phone service: Requires 215.

CRICKET MONTHLY RATE PLANS

cricket
wireless

CRICKET PLANS NO SIGNED CONTRACTS |



\$30

\$35

\$40

\$45

UNLIMITED
talk

UNLIMITED
talk
text
long distance

UNLIMITED
talk
text
long distance
pix
mexico text

UNLIMITED
talk
text
long distance
pix
mexico text
mobile web
411
premium extended
coverage

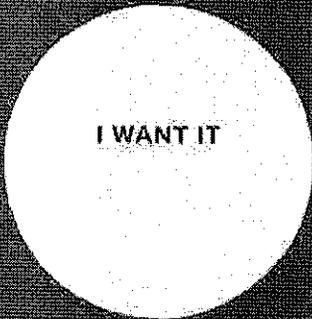
WITH
caller ID

WITH
caller ID

WITH
caller ID
call waiting
3-way calling
voicemail

WITH
caller ID
call waiting
3-way calling
voicemail

NO CREDIT CHECKS



I WANT IT

\$50

\$60

UNLIMITED

- talk
- text
- long distance
- pix
- mexico text
- global text
- mobile web
- 411
- premium extended coverage
- mobile email
- mybackup

WITH

- caller ID
- call waiting
- 3-way calling
- voicemail
- call forwarding
- 30 min roaming

UNLIMITED

- talk
- text
- long distance
- pix
- mexico text
- global text
- mobile web
- 411
- premium extended coverage
- mobile email
- mybackup

WITH

- caller ID
- call waiting
- 3-way calling
- voicemail
- call forwarding
- 200 min roaming

Add features to your plan starting at \$2 per month.

- ringback tones.....\$5
- unlimited video downloads.....\$5

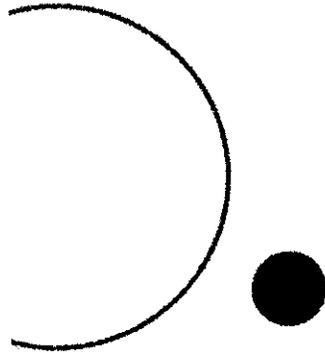
- mybackup.....\$2
- phone protection.....\$5

- unlimited global text.....\$5
- north america long distance.....\$5, \$15, \$25
- mexico mobile long distance.....\$10, \$30, \$35

- premium extended coverage.....\$5
- nationwide roaming.....\$5, \$10, \$15

- unlimited 411.....\$2
- unlimited mobile web.....\$5
- call forwarding.....\$5

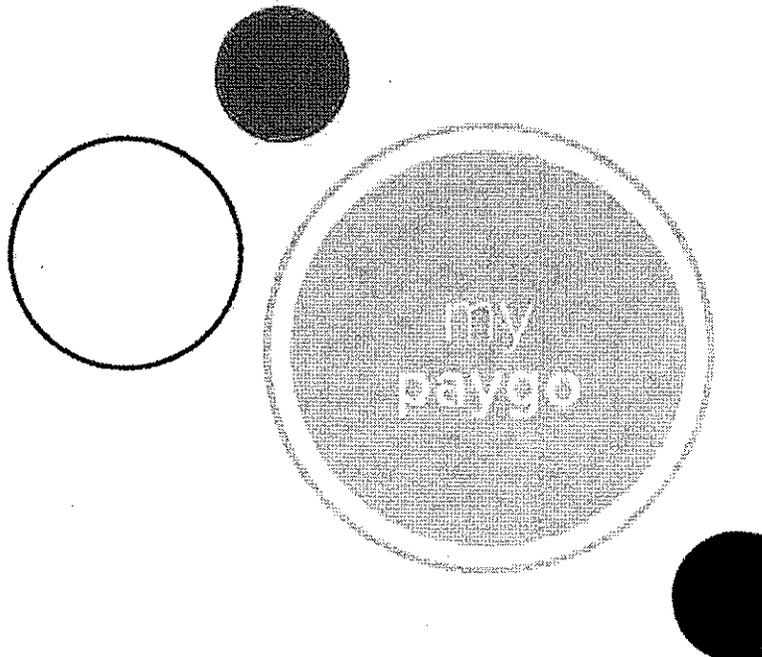
cricket®
paygo



UNLIMITED PAY AS YOU GO

only pay for the days
you use your phone

STARTING AT \$1/DAY



SIMPLE & AFFORDABLE FOR EVERYONE

When Cricket PAYGo says unlimited, we mean it. We don't limit your "unlimited" calling to nights and weekends or people on the same network. With us, you're UNLIMITED 24/7! And the best part, it's all for a low, flat daily price. So stop worrying about minutes and start actually using your phone.

DAILY RATE PLANS

When you activate your phone you will choose between the \$1, \$2, and \$3 daily rate plans. You are free to switch your rate plan at any time.



VOICE CALLS

(local calls)	UNLIMITED	UNLIMITED	UNLIMITED
US long distance	10¢/min	UNLIMITED	UNLIMITED
to mobile	39¢/min	39¢/min	39¢/min
premium extended coverage	N/A	UNLIMITED	UNLIMITED

MESSAGING

US text messaging	N/A	UNLIMITED	UNLIMITED
US picture messaging	N/A	UNLIMITED	UNLIMITED
global text messaging	N/A	UNLIMITED	UNLIMITED

MORE FEATURES

mobile web	\$1/day	\$1/day	UNLIMITED
411 directory assistance	\$1/use	\$1/use	UNLIMITED

ALL OUR PLANS INCLUDE
voicemail • call waiting • caller id • 3-way calling

HOW IT WORKS

- Enjoy UNLIMITED 24/7 local calling to anyone on any network for only \$1/day
- Step up to get other UNLIMITED 24/7 services, including US long distance, text and picture messaging, mobile web access, and more
- Only pay for your Cricket PAYGo service on the days you decide to use your phone
- Change your Cricket PAYGo daily rate plan whenever you want to

mycricket.com

TOPPING UP YOUR ACCOUNT

There are plenty of ways to top-up. Use the one that's right for you.

Dial *PAY (*729) from your Cricket PAYGo phone to redeem pre-purchased PINs/cards or conveniently pay with your credit or debit card

Purchase Cricket PAYGo top-up cards at thousands of retail partner locations

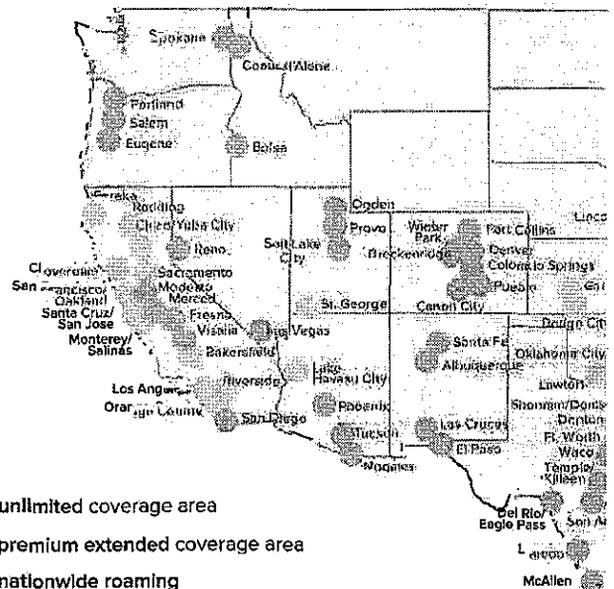
Visit any Cricket Authorized Dealer or payment location

And if your account starts to run low, we'll remind you to top-up so your UNLIMITED 24/7 service isn't interrupted.

WE'VE GOT YOU COVERED

Use your UNLIMITED 24/7 Cricket PAYGo service in over 60 Cricket coverage areas across the US. Expand your unlimited coverage to more than 4600 cities and towns by choosing one of our plans with premium extended coverage.

If you travel outside of your unlimited coverage area, roaming is available in all Cricket PAYGo plans for a low per minute charge.



Some coverage areas require a tri-band phone. Ask a sales representative for more details.

GET EVEN MORE
FROM YOUR PHONE

Use funds from your account to purchase these and other extras:

- Access today's hottest ringtones, wallpapers, and more through the mobile web
- Download the latest games and play on the go
- Call beyond borders with great international calling rates

Check the Cricket PAYGo phone packaging to make sure that your new phone supports the extras you want to use.

MORE QUESTIONS?

Cricket PAYGo Customer Care is available to help you at 1-800-CRICKET.

IT'S EASY TO
GET STARTED

- 1 CHOOSE your Cricket PAYGo amount
- 2 SELECT your PIN MEMBERSHIP ID
- 3 PICK your top-up

TO ACTIVATE
DIAL 1-800-CRICKET OR
VISIT MYCRICKET.COM



ATTACHMENT B

U.S. Wireless Carrier Consumer Practices

	ETF policies	Trial period	Point of sale information/documentation	Online, street-level coverage maps	Ability to change plan w/o contract extension	Ability to purchase service w/o a contract (prepaid)	Ability to bring your own phone	Ability to pay full price for a handset and take service w/o a contract	Military Personnel Benefits	
									Suspension	Termination
AT&T	Prorates new and renewed 1 & 2 year consumer contracts. Fees decline by \$5 each completed month of the contract ¹	30-day ²	Follows CTIA Consumer Code ³	Yes ⁴	Yes ⁵	Yes ⁶	Yes ⁷	Yes ⁸	Yes ⁹	No ETF ¹⁰
Sprint Nextel	Prorates new and renewed 1 & 2 year consumer contracts. Fees decline by \$10 per month, beginning with the 5th month of the contract until reaching \$50 for the remaining 5 months of the contract. ¹¹	30-day ¹²	Follows CTIA Consumer Code ¹³	Yes ¹⁴	Yes ¹⁵	Yes ¹⁶	Yes ¹⁷	Yes ¹⁸	Yes ¹⁹	No ETF ²⁰
T-Mobile USA	Prorates new and renewed 1 and 2 year consumer contracts. \$100 with < 180 days left, \$50 with < 90 days left, and the lesser of \$50 or the customers' standard monthly charge with < 30 days left ²¹	14-day (30 days in CA) ²²	Follows CTIA Consumer Code ²³	Yes ²⁴	Yes ²⁵	Yes ²⁶	Yes ²⁷	Yes ²⁸	Yes ²⁹	No ETF ³⁰
U.S. Cellular	Starting in the 5 th month, the ETF will be reduced by \$7.50/month (24 month contract) or \$18.50/month (12 month contract) ³¹	30-day ³²	Follows CTIA Consumer Code ³³	No, State-level only ³⁴	Yes ³⁵	Yes ³⁶	Yes ³⁷	Yes ³⁸	Yes ³⁹	No ETF
Verizon Wireless	Prorates new and renewed contracts Fees decline by \$5 per month ⁴⁰	30-day ⁴¹	Follows CTIA Consumer Code ⁴²	Yes ⁴³	Yes ⁴⁴	Yes ⁴⁵	Yes ⁴⁶	Yes ⁴⁷	Yes ⁴⁸	No ETF ⁴⁹

¹ Press Release, AT&T Implements New Approach to Early-Termination Fees, (May 23, 2008) *available at* <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=25892>; See “Hanging Up on Early Exit Fees” (June 5, 2008), *available at* http://www.businessweek.com/technology/content/jun2008/tc2008063_586218.htm (Last accessed May 29, 2009)

² AT&T Return Policy, *available at* <http://www.wireless.att.com/cell-phone-service/legal/return-policy.jsp> (Last accessed May 29, 2009).

³ CTIA Consumer Code for Wireless Service, *available at* <http://www.wireless.att.com/learn/articles-resources/consumer-code.jsp>. See “Wireless Carriers Adopt Guidelines”, *available at* <http://www.cbsnews.com/stories/2003/08/04/tech/main566584.shtml> (Last accessed May 29, 2009)

⁴ See <http://www.wireless.att.com/coverageviewer/> (Last accessed May 29, 2009)

⁵ See <http://www.wireless.att.com/answer-center/main.jsp?t=solutionTab&solutionId=KB61945>. See “AT&T Eases Penalties on Mobile Plans”, *available at* <http://www.marketwatch.com/story/att-eases-penalties-on-mobile-plans?dist=SecMostMailed> (Last accessed May 29, 2009)

⁶ <http://www.wireless.att.com/cell-phone-service/go-phones/index.jsp> (Last accessed May 29, 2009)

⁷ <http://www.wireless.att.com/cell-phone-service/legal/plan-terms.jsp> (Last accessed May 29, 2009)

⁸ <http://www.wireless.att.com/learn/basics/shopping-faqs.jsp#106> (Last accessed May 29, 2009)

⁹ http://www.wireless.att.com/answer-center/main.jsp?t=solutionTab&ft=searchTab&ps=solutionPanels&locale=en_US&_dyncharset=UTF-8&solutionId=60168&isSrch=Yes (Last accessed May 29, 2009)

¹⁰ See <http://www.wireless.att.com/businesscenter/business-programs/government/federal-programs.jsp> (last accessed June 1, 2009)

¹¹ http://nextelonline.nextel.com/en/services/termination_fee/early_termination_fee.shtml?id9=vanity:etf (last accessed June 3, 2009).

¹² <http://www.sprint.com/landings/returns/> (last accessed June 3, 2009).

¹³ See http://www2.sprint.com/mr/gp_dtl.do?article=840 (Last accessed May 29, 2009)

¹⁴ See <http://coverage.sprintpcs.com/IMPACT.jsp?PCode=vanity:coverage> (Last accessed May 29, 2009)

¹⁵ See http://support.sprint.com/doc/sp3215.xml?user.status=prospect&user.site=sprint&id12=HispanicHP_SupportTab_Link_ComoPuedoCambiarMiPlanDeServicioPorInternet (Last accessed May 29, 2009)

¹⁶ See http://support.sprint.com/doc/sp10549.xml?id16=prepaid_plans; <http://www.sprint.com/en/boostlanding/> (Last accessed May 29, 2009)

¹⁷ See http://nextelonline.nextel.com/en/legal/legal_terms_privacy_popup.shtml (Last accessed May 29, 2009)

¹⁸ See http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions (Last accessed May 29, 2009)

¹⁹ See <http://support.sprint.com/doc/sp10702.xml?id16=military> (Last accessed May 29, 2009)

²⁰ See http://support.sprint.com/doc/sp11408.xml?id16=military_deployment (last accessed June 3, 2009) (deployment must exceed 90 days).

²¹ See http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true&WT.srch=2&Result_Inq=answer&InqSource=TMO. See http://www.consumeraffairs.com/news04/2007/11/sprint_tmobile.html. (Last accessed May 29, 2009)

²² See http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true&WT.srch=2&Result_Inq=answer&InqSource=TMO (Last accessed May 29, 2009)

²³ http://www.t-mobile.com/Company/Community.aspx?tp=Abt_Tab_ConsumerCode (Last accessed May 29, 2009)

²⁴ <http://www.t-mobile.com/coverage/pcc.aspx> (Last accessed May 29, 2009)

²⁵ http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true&WT.srch=2&Result_Inq=answer&InqSource=TMO (Last accessed May 29, 2009) (although some promotional plans require customer to sign another service contract)

²⁶ <http://www.t-mobile.com/shop/plans/Prepaid-Plans.aspx> (Last accessed May 29, 2009)

²⁷ http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true&WT.srch=2&Result_Inq=answer&InqSource=TMO (Last accessed May 29, 2009)

²⁸ Id.

²⁹ See “Military Suspension Can Protect Accounts”, *available at* <http://www.washingtonpost.com/wp-dyn/content/article/2008/04/11/AR2008041102819.html> (Last accessed May 29, 2009)

³⁰ Id.

³¹ See http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=legal_csa (last accessed June 1, 2009)

³² http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=a_30day (last accessed June 1, 2009)

³³ See http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=a_code (last accessed June 1, 2009)

³⁴ http://www.uscc.com/uscellular/SilverStream/Pages/x_page.html?p=map_home (last accessed June 1, 2009)

³⁵ See http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=a_excellence (last accessed June 1, 2009)

³⁶ http://www.uscellular.com/uscellular/SilverStream/Pages/x_page.html?p=b_prepaid (last accessed June 1, 2009)

³⁷ See http://www.uscc.com/uscellular/SilverStream/Pages/x_page.html?p=legal_csa (last accessed June 1, 2009)

³⁸ See id.

³⁹ See http://www.uscc.com/uscellular/SilverStream/Pages/x_page.html?p=military_dc

⁴⁰ <http://news.vzw.com/news/2006/11/pr2006-11-16e.html>; see also <http://www.techdirt.com/articles/20061117/115842.shtml> (Last accessed May 29, 2009)

⁴¹ http://www.verizonwireless.com/b2c/globalText?textName=RETURN_POLICY&jspName=footer/returnPolicy.jsp (Last accessed May 29, 2009)

⁴² <https://www.openwebdevsummit.com/node/41351> (Last accessed May 29, 2009)

⁴³ <http://www.verizonwireless.com/b2c/CoverageLocatorController?requesttype=NEWREQUEST&market=All>; see also “Where Does Your Cell Phone Work?” (Dec 16, 2002), *available at* <http://www.computerworld.com/printthis/2002/0,4814,76664,00.html> (Last accessed May 29, 2009)

⁴⁴ <http://news.vzw.com/news/2007/10/pr2007-10-01a.html> (Last accessed May 29, 2009)

⁴⁵ http://www.verizonwireless.com/pdfs/user_guides/PrepaidPOSBro_English_Internet.pdf (Last accessed May 29, 2009)

⁴⁶ http://www.verizonwireless.com/b2c/globalText?textName=CUSTOMER_AGREEMENT&jspName=footer/customerAgreement.jsp (Last accessed May 29, 2009)

⁴⁷ Press Release, No Contract Required — New Month-To-Month Agreement Gives Verizon Wireless Customers Even More Freedom (Sept 22, 2008) *available at* <http://news.vzw.com/news/2008/09/pr2008-09-22b> (last accessed May 29, 2009); See http://news.cnet.com/8301-1035_3-10048123-94.html (Last accessed May 29, 2009)

⁴⁸ Press Release, Verizon Wireless Adjusts Contract Policy to Accommodate Customers on Extended Military Duty (Sept 13, 2007), *available at* <http://news.vzw.com/news/2007/09/pr2007-09-13.html> (last accessed May 29, 2009).

⁴⁹ Id.

ATTACHMENT C

CTIA

Consumer Code *for* Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, to help ensure that consumers understand their wireless service and rate plans, and to continue to provide wireless service that meets consumers' needs, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each rate plan offered to new consumers, wireless carriers will make available to consumers in collateral or other disclosures at point of sale and on their web sites, at least the following information, as applicable: (a) the calling area for the plan; (b) the monthly access fee or base charge; (c) the number of airtime minutes included in the plan; (d) any nights and weekend minutes included in the plan or other differing charges for different time periods and the time periods when nights and weekend minutes or other charges apply; (e) the charges for excess or additional minutes; (f) per-minute long distance charges or whether long distance is included in other rates; (g) per-minute roaming or off-network charges; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) whether a fixed-term contract is required and its duration; (k) any activation or initiation fee; and (l) any early termination fee that applies and the trial period during which no early termination fee will apply.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate voice service coverage applicable to each of their rate plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain an appropriate legend concerning limitations and/or variations in wireless coverage and map

usage, including any geographic limitations on the availability of any services included in the rate plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

T H R E E

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates service with a wireless carrier or agrees to a change in service whereby the customer is bound to a contract extension, the carrier will provide or confirm the material terms and conditions of service with the subscriber.

F O U R

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including airtime usage, may still apply.

F I V E

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service or devices, wireless carriers will disclose material charges and conditions related to the advertised prices, including if applicable and to the extent the advertising medium reasonably allows: (a) activation or initiation fees; (b) monthly access fees or base charges; (c) any required contract term; (d) early termination fees; (e) the terms and conditions related to receiving a product or service for "free;" (f) the times of any peak and off-peak calling periods; (g) whether different or additional charges apply for calls outside of the carrier's network or outside of designated calling areas; (h) for any rate plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; (i) whether prices or benefits apply only for a limited time or promotional period and, if so, any different fees or charges to be paid for the remainder of the contract term; (j) whether any additional taxes, fees or surcharges apply; and (k) the amount or range of any such fees or surcharges collected and retained by the carrier.

S I X

SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

S E V E N

**PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE
FOR CHANGES TO CONTRACT TERMS**

Carriers will not modify the material terms of their subscribers' contracts in a manner that is materially adverse to subscribers without providing a reasonable advance notice of a proposed modification and allowing subscribers a time period of not less than 14 days to cancel their contracts with no early termination fee.

E I G H T

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

N I N E

**PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS
RECEIVED FROM GOVERNMENT AGENCIES**

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

T E N

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online.