

DECLARATION OF JAVIER ROSADO

My name is Javier Rosado, and I declare as follows:

1. I am Senior Vice President - Lifeline Services, TracFone Wireless, Inc.

My business address is 9700 NW 112th Avenue, Miami, FL 33178.

2. In my capacity as Senior Vice President - Lifeline Services, I am responsible for the implementation of TracFone's Lifeline service program which it provides as an Eligible Telecommunications Carrier pursuant to Section 214(e) of the Communications Act of 1934, as amended. Those services are provided in approximately 30 States under the brand name, SafeLink Wireless®. It is TracFone's policy to comply with all applicable federal and state requirements governing the enrollment of customers in its Lifeline program, including requirements governing initial certification of eligibility and verification of continuing eligibility. Those include a requirement that TracFone obtain from each Lifeline customer verification that the customer receives Lifeline-supported service only from TracFone.

3. If TracFone were required to de-enroll from its Lifeline program customers who have demonstrated their eligibility for Lifeline in conformance with applicable rules and who have self-certified that they receive Lifeline-supported service only from TracFone, TracFone would suffer significant irreparable injury -- injury for which there would be no available remedy. Every TracFone Lifeline customer is provided with an E911-compliant wireless handset at no charge. Those handsets are shipped to customers upon enrollment via overnight delivery services. The costs of the handsets as well as the shipping costs are borne entirely by TracFone. No portion of those costs is covered by the Federal Universal Service Fund. In addition, TracFone

spends millions of dollars annually advertising its Lifeline services using media of general distribution in the states where it offers Lifeline service. TracFone recovers those advertising, marketing and consumer outreach costs, in part, through revenues which it derives from provision of service to its Lifeline customers.

4. If TracFone were required to de-enroll customers from its Lifeline program based upon the procedures set forth in the January 21, 2011 letter from Sharon Gillett, Chief, Wireline Competition Bureau, to the Universal Service Administrative Company, it would no longer be able to generate revenues from those customers, all of whom were enrolled in TracFone's Lifeline program, in full conformance with applicable FCC and state requirements, to cover those handset, handset shipping, and advertising, marketing and consumer outreach costs. Accordingly, those costs and the loss of revenue sources to recover those costs would constitute irreparable injury.

I make this Declaration under penalty of perjury.

A handwritten signature in black ink, appearing to read "Javier Rosado". The signature is written in a cursive style with a large initial "J" and "R".

Javier Rosado