

**REDACTED**  
**AVAILABLE FOR PUBLIC INSPECTION**

August 26, 2011

**VIA ELECTRONIC FILING**

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

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization  
CC Docket No. 96-45 - Federal-State Joint Board on Universal Service  
WC Docket No. 03-109 - Lifeline and Link Up  
**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

This ex parte letter is submitted on behalf of TracFone Wireless, Inc. (“TracFone”) in response to a request for information from Commission Staff. TracFone offers three SafeLink Wireless<sup>®</sup> Lifeline plans, each of which offer different features and provide a different amount of free airtime minutes per month: (1) 68 minutes; (2) 125 minutes; and (3) 250 minutes. Any qualified Lifeline customer may enroll in any of the three plans. Commission Staff requested information regarding the features of the three plans and the number and percentage of SafeLink Wireless<sup>®</sup> customers that choose each plan.

**REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 0.459 of the Commission’s rules, TracFone, by its undersigned counsel, requests that certain information contained in this letter be accorded confidential treatment and that such information not be routinely available for public inspection. In particular, TracFone requests that data regarding the number and percentage of SafeLink Wireless<sup>®</sup> Lifeline customers that choose each Lifeline plan receives confidential treatment. The requested data includes highly confidential competitively sensitive information which would cause TracFone harm if that data became available to existing or potential competitors. In addition, the requested data is not available to the public. Public disclosure of data regarding the number and percentage of SafeLink Wireless<sup>®</sup> customers that choose each of the three Lifeline plans and access by TracFone’s competitors to the requested information would be competitively harmful to TracFone because it would provide competitors with important information regarding which Lifeline plans are preferred by customers and whether TracFone’s Lifeline plans are meeting the needs of its customers. Accordingly, pursuant to Section 0.459 of the Commission’s

**REDACTED**  
**AVAILABLE FOR PUBLIC INSPECTION**

Ms. Marlene H. Dortch  
August 26, 2011  
Page 2

rules, TracFone respectfully requests that the information provided in this letter not be routinely available for public inspection.

**RESPONSE TO REQUEST FOR INFORMATION**

TracFone's SafeLink Wireless<sup>®</sup> Lifeline offering includes three options. Qualified customers may choose any of the three options and can switch to a different option at any time. The minutes of airtime for each option may be used for local calling, long distance calling (intrastate and interstate), roaming, texting, and, with respect to the 68 minutes option, international calling to more than 60 destinations. Texting is available with each plan, but the rate for each text in terms of airtime deducted differs for each plan. Under the 68 minutes option, 0.3 minutes are deducted for each text sent or opened. Under the 125 minutes and 250 minutes options, 1 minute is deducted for each text sent or opened. Each of the three options also includes voicemail, caller ID, and call waiting at no additional charge. The three options are distinguished by the following features:

68 minutes plan - Allows for carry over of unused minutes and international calling; texting rate is 3 texts per 1 minute.

125 minutes plan - Allows for carry over of unused minutes; texting rate is 1 text per 1 minute.

250 minutes plan - Does not allow for carry over of unused minutes unless additional minutes are purchased; texting rate is 1 text per 1 minute.

When TracFone commenced offering Lifeline service in 2008, it only offered one plan with 68 minutes. (In accordance with relevant requirements in certain states, TracFone offered a higher or lower number of free monthly airtime minutes in those states.) TracFone introduced the 125 minutes plan and the 250 minutes plan nationwide in August 2010 following several months of market testing and analysis. TracFone decided to substantially increase the Lifeline benefit in terms of minutes of airtime in response to perceived consumer need for additional minutes of service and in response to competitive marketplace developments. TracFone's SafeLink Wireless<sup>®</sup> customers choose the option that best meets their needs. For example, Lifeline customers who want to use their airtime minutes for international calling may choose the 68 minutes plan while Lifeline customers who value the carry over benefit, but who do not want to use their airtime minutes for international calling may choose the 125 minutes plan. Customers desiring the maximum number of minutes per month may choose the 250 minutes plan.

**REDACTED**  
**AVAILABLE FOR PUBLIC INSPECTION**

Ms. Marlene H. Dortch  
August 26, 2011  
Page 3

**REDACTED**

TracFone is providing the confidential version of this letter to the members of the Commission staff who are responsible for Lifeline issues. A redacted version of this letter is being filed electronically in accordance with Sections 0.459(a)(1) and 1.1206 of the Commission's rules. If there are questions, please communicate directly with undersigned counsel for TracFone.

Respectfully submitted,



Mitchell F. Brecher

cc: Mr. Robert Finley  
Mr. Jonathan Lechter  
Ms. Kimberly Scardino  
Ms. Divya Shenoy  
Ms. Jamie Susskind  
Ms. Cindy Spiers