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March 26, 2014

VIA ELECTRONIC FILING

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

Re: WC Docket No. 11-42 –Lifeline and Link Up Reform and Modernization

Dear Ms. Dortch:

On March 20, 2014, Mark Rubin, Senior Executive – Government Relations, TracFone Wireless, Inc., Nicholas Bonfiglio, Jose Garcia-Tunon, and Elizabeth Simonhoff, each of TracFone Wireless, Inc., and undersigned counsel for TracFone, participated in two meetings with members of the Commission staff. Attendees at the first meeting included Matt Quinn of the Office of Strategic Planning and Policy Analysis, and Garnet Hanly, Christianna Barnhart, and Arti Sotedar, all of the Wireline Competition Bureau, Telecommunications Access Policy Division. During the second meeting, the same group from TracFone met with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn. During the meetings, we discussed TracFone's provision of mobile health care telecommunications service – a service offered as part of TracFone's SafeLink Wireless® Lifeline program. This program is offered in cooperation with several partners, including Voxiva and many health maintenance organizations, to provide mobile access, including unlimited SMS text messaging between Medicaid patients and health care providers. Details of the program are described in a written presentation which was provided to all attendees. A copy of that presentation is enclosed herewith.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,

Mitchell F. Brecher

cc: Ms. Rebekah Goodheart
Mr. Matt Quinn
Ms. Garnet Hanly
Ms. Christianna Barnhart
Ms. Arti Sotedar

Enclosure

Enclosure

TRACFONE WIRELESS

HEALTHCARE

JANUARY 2014

TRACFONE wireless, inc.

PROJECT OVERVIEW

In 2008, TracFone Wireless, the largest prepaid wireless provider in the United States was authorized by the Federal Communications Commission **(FCC)** to participate in the Lifeline program. SafeLink Wireless, is the trade name of TracFone's Lifeline assistance program.SafeLink is currently authorized to do business in 39 states including the District of Columbia and Puerto Rico and is the nation's largest wireless Lifeline provider with over 4 million subscribers.

In 2012, SafeLink began partnering with health care organization all over the country to offer phones, service and mobile health technology to the Medicaid population.This has resulted in over 13 Health Maintenance Organization **(HMO)** partnerships.

SafeLink WIRELESS + voxiva better health in your hands = SafeLink HealthSolutions

CURRENT MARKET NEED

- The global healthcare system inefficiency wastes US $2 trillion each year.

- Medicaid represents 1/6 of all healthcare spending and 41% of long term healthcare expenditures. Spending is projected to grow at an average rate of 5.8% from 2012-2022.

- 70% of healthcare costs in the US goes to managing chronic conditions because of the inability to collect, share and use data from a variety of sources to support diagnosis and treatment decisions.

- Medicaid Health plan cost have been increasing by 11.3% per member, per month (PMPM)

10,000 EVERY DAY	PEOPLE TURNING 65
45 MILLION	HOSPITAL VISITS
$31 BILLION	READMISSIONS
$300 BILLION	MED ADHERENCE
$2 TRILLION	CHRONIC DISEASE
140 MILLION	SMARTPHONE USERS
1	SOLUTION

These factors present an opportunity for TracFone to work with Managed Care Entities to help them reduce cost of care and increase efficiencies by providing a wireless M-Health solution.

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OUR ADDED VALUE

• Nearly **1/3** of individuals do not have an active home telephone and **12%** do not have a mobile phone. **80%** of cell phone owners say then send and receive text messages (Columbia University Study)

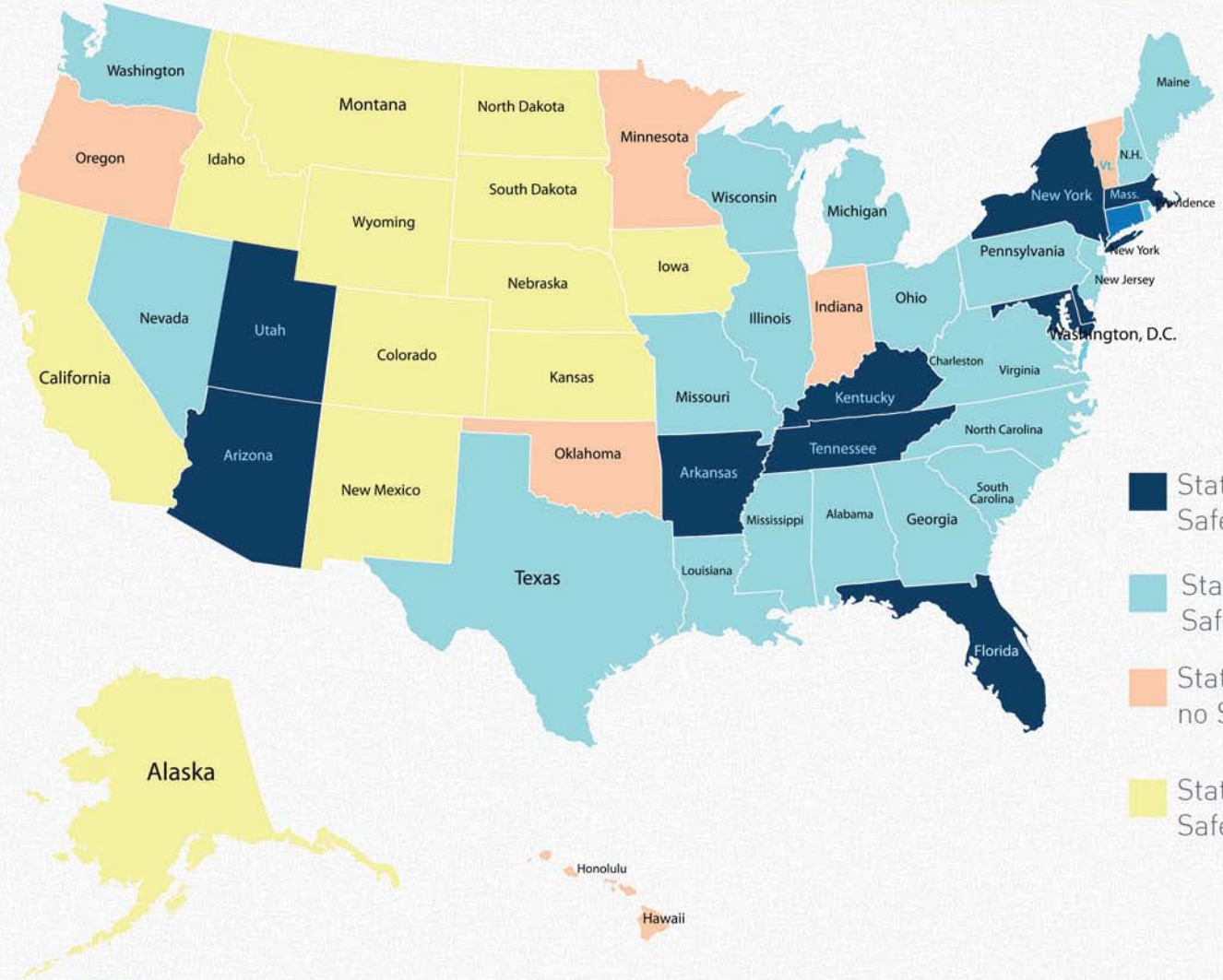
• Surveys show over **80%** of Medicaid patients text/email regularly and preliminary studies suggest simple personal text/email messaging reminders increases high-risk patient compliance in taking their medication and keeping medical appointments by significant levels.

• When Medicaid health plans to have real-time, accurate information on their members it helps enable them to efficiently manage the care of their members, increase engagement and reduce cost.

• Medicaid health plans often have trouble contacting their members which impedes their ability to administer and enroll them in their benefits. Having reliable contact information enables health plans to enroll members in care management programs which improve patient outcomes.

• A pre-programmed number makes it possible for the Medicaid member to call their health plan which is vital to the access of health care services and for the member's health overall.

MEDICAID TRENDS-OPPORTUNITY SIZE



States with Mandated Managed Care and SafeLink Service

States with Some Managed Care and SafeLink Service

States with Mandated Managed Care and no SafeLink Service

States with Some Managed Care and no SafeLink Service

Medicaid provides health and long-term care coverage to more than **62 million low-income Americans.**
By 2022, Medicaid enrollment is expected to increase by 21.3 million

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THE TRACFONE OFFER

A COMPLETE PATIENT ENGAGEMENT SOLUTION.

TracFone has partnered with Voxiva to create **SafeLink Health Solutions**. A mobile health solution that connects HMOs to better care for their customers and value for their organization.

The partnership uses Voxiva's proven technology to deploy SafeLink Health Solutions across healthcare networks throughout the United States. Eligible SafeLink customers simply enroll in Lifeline.

THE MOBILE HEALTH PACKAGE ASSISTS HMOS:

Engaging and supporting members with improving their health

Improving key quality measures (e.g. HEDIS/EPSDT)

Differentiate themselves in the marketplace

Improving member satisfaction

Increasing re-enrollment rates

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A PROVEN PARTNER

Founded in 2001, Voxiva is a pioneer in delivering interactive mobile health services that deliver better health and lower costs.Voxiva develops interactive patient education and engagement services that rely on evidence-based content and follow national guidelines.

TRUST HEALTH CONTENT + **INTERACTIVE ENGAGEMENT** = **BETTER HEALTH LOWER COST**

text4baby
text4kids
txt4health
text2quit
care4life

NDEP National Diabetes Education Program
CDC
BRIGHT FUTURES
THE GEORGE WASHINGTON UNIVERSITY
American Diabetes Association.

voxiva™
better health in your hands

FAST COMPANY
50 MOST INNOVATIVE COMPANIES

A GLOBAL LEADER IN MOBILE HEALTH SINCE 2001- EXCLUSIVE TO TRACFONE

TRACFONE® wireless, inc.

voxiva™
better health in your hands

INNOVATIVE SOLUTIONS

INTERACTIVE SMS

MOBILE WEB

PERSONAL PORTAL

MANAGEMENT DASHBOARD

PERSONALIZED

EVIDENCE-BASED CONTENT

MULTI-CHANNEL

MULTI-LINGUAL (ENGLISH & SPANISH)

SECURE HOSTED, MANAGED SERVICES

HIPAA COMPLIANT

REAL-TIME DATA ACCESS

API INTEGRATION WITH CLIENT SYSTEMS

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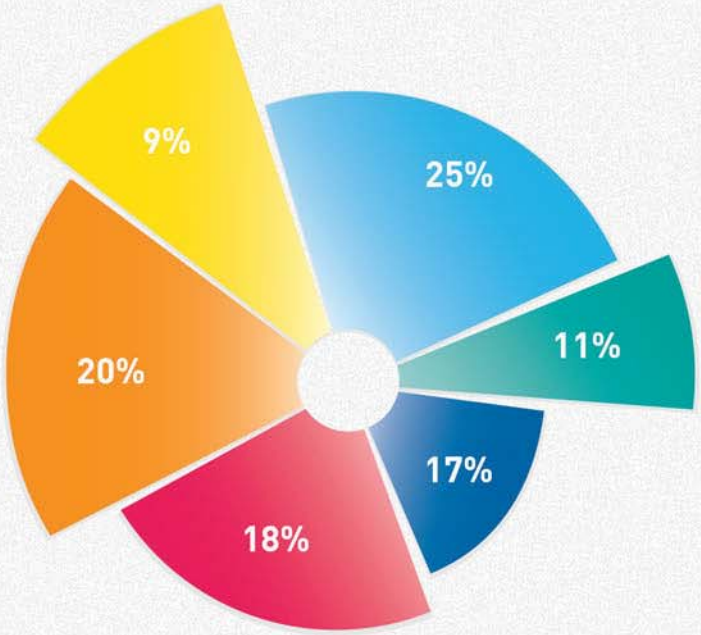
SAFELINK MARKET SUCCESS



- Amerigroup
- Centene
- WellPoint
- Molina
- Aetna
- Humana

SafeLink HealthSolutions

Partnerships with HMOs make up over 65% of the Managed Medicaid market.

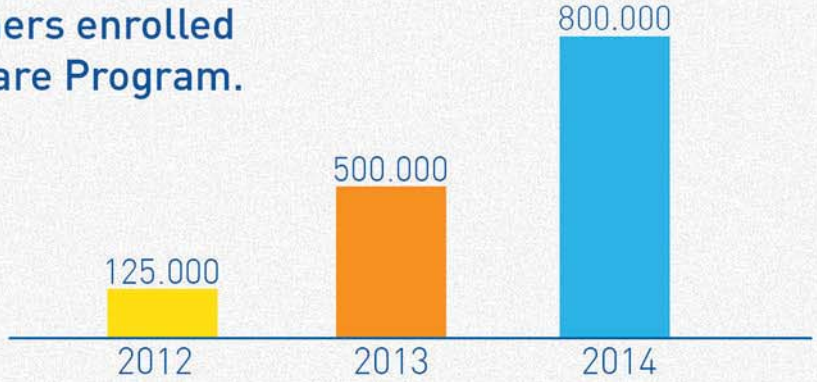
13 million+ lives

20% growth in client base over 3 years

Early Results

- June 2012 launch
- Over 100k in Year 1
- 500% increase in Year 2
- 800k projection in 2014

Lifeline customers enrolled in the Health Care Program.



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ACCENTURE WHITE PAPER- CLINICAL RESULTS

The aggregate value unlocked is display in Table 1: Primary Impact of Current and Potential SafeLink Services below for a hypothetical 1 million life Medical health plan as well for all Medical members enrolled in Medical managed health plans, which in 2011 had 4204 million members:

Service	Primary Impact of Services on:	
	One Million Life Medicaaid Health Plan	Medicaid Health Plan Market
Phone	~$100M in higher revenue	**~$1.7-2.2B in higher revenue**
Administrative and Clinical Massaging	~$400M in cost rereduction	**~$1.8B in cost reduction**
Remote Monitoring	~$170M in medical cost rereduction	~7.3B in cost reduction

Table 1: Primary Impact of Current and Potential SafeLink Services

If every Medicaid recipient used SafeLink Health Solutions the managed care industry in America would generate or save
$4 BILLION ANNUALLY

For the hypothetical 1 million life Medicaid health plan the above values translate in the following per member per month (PMPM) margin improvements due to revenue gains, administrative cost and medical cost reduction as show in Table 2: PMPM improvement in Margin by Current/Potential Service blow:

	PMPM Improvement in Margin Due To:			
SafeLink Current/ Potential Service	Revenue Gain	Administrative Cost Reduction	Medical Cost Reduction	**Total**
Phone	$0.46	$0.01	$4.71	$5.18
Administrative and Clinical Massaging	$0.54	$0.23	$3.31	$4.08
Remote Monitoring	--	$1.88	$14.09	$15.97
Full/Potential Value	$1.00	$2.12	$22.12	$25.23

Table 2: PMPM Improvement in Margin by Current/Potential Service

PMPM impact from the phone and admin/clinical messaging is
$9.26

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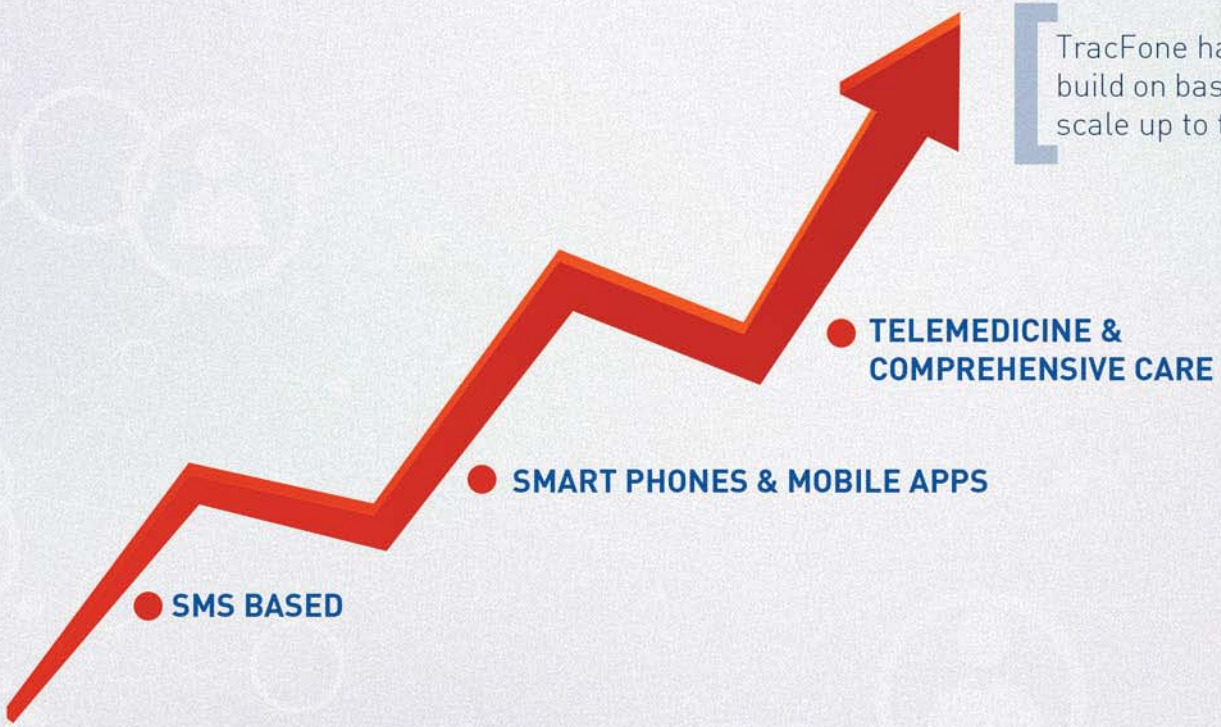
THE FUTURE OF MOBILE HEALTH AND TRACFONE

[TracFone has strategically set out a winning strategy to build on basic SMS mHealth functionality and ultimately scale up to telemedicine]



Once Health Care organizations experience the real results generated at the low-income spectrum for mHealth services, more funds will be allocate for larger scale deployment.

This natural cost progression means more smart phone applications pre-loaded on sophisticated handsets. Qualcomm 2net

By positioning itself within the managed care marketplace, through the Medicaid mhealth offering, TracFone will greatly benefit from these existing relationships and operational integration for all future evolutions in mhealth services.

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TELEMEDICINE & BIOMETRIC DATATRACKING

BEST OF CLASS, IT JUST WORKS

Bundling strong brand name, best of class brands with private label differentiation in one seamless, connected experience

- **WEBMD**
- **AMERICAN HEART ASSOCIATION**
- **HEALTHYCIRCLES PAYER PRIVATE LABEL**
- **CVS**
- **WALGREENS**
- **PAYER APP**

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