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Rutledge | Ecenia

August 20, 2020

Mr. Adam Teitzman
Director, Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

REDACTED

Re: Assurance Wireless USA, LP f/k/a Virgin Mobile USA, LP's Response to Florida Lifeline Data Request 2020

Dear Mr. Teitzman:

Although wireless Eligible Telecommunications Carriers no longer fall under the jurisdiction of the Florida Public Service Commission, as a courtesy Assurance Wireless USA, LP f/k/a Virgin Mobile USA, LP ("Assurance Wireless") provides the enclosed responses to Staff's Lifeline Data Request.

Enclosed for filing are:

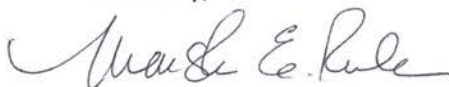
1. Public Attachment A: Assurance Wireless's redacted response to Staff's data request, as required by Rule 25-22.006(5), Florida Administrative Code, and
2. Confidential Attachment B: a sealed envelope marked "CONFIDENTIAL," containing confidential portions of Assurance Wireless's response.

Pursuant to §364.183(1), Florida Statutes, Assurance Wireless claims that the highlighted portions of the documents provided in Confidential Attachment B are confidential and proprietary business information of Assurance Wireless that should be kept confidential and exempt from public disclosure.

Thank you for your assistance in this matter. Please feel free to call me at 850.445.1166 if you have any questions regarding this matter.

RECEIVED-FPSC
2020 AUG 20 PM 4:10
COMMISSION CLERK

Sincerely,



Marsha E. Rule

CC: Bill Atkinson, Esq.

CLEC AND WIRELESS LIFELINE DATA REQUEST 2020

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **please provide responses to the following questions by August 15, 2020. Your response should include your company name, contact person, and email address.**

Please answer the following questions as they relate to your company's Florida Lifeline customer, providing data for the fiscal year July 1, 2019, through June 30, 2020.

For those items requesting the data be reported monthly, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

RESPONSE: As a wireless-only provider, Assurance Wireless does not have any "residential access lines."

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision.

RESPONSE: Please see Schedule 1.

3. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision.

RESPONSE: Please see Schedule 1.

4. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

RESPONSE: Please see Schedule 1.

5. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

RESPONSE: Yes, please see Schedule 1. The 10c a minute plan is disclosed in our terms of service. In addition, we also provide notification to individual customers who are placed on the transition service because they are no longer eligible for Lifeline service. .

6. The number of customers participating in Lifeline under the Tribal Lands provision each month.

RESPONSE: Please see Schedule 1.

7. Description of your company's procedures for Lifeline. Include the following in your response:

- a. Internal procedures for promoting Lifeline.

RESPONSE: Assurance Wireless has multiple toll-free numbers as contact points for Lifeline inquiries with the ability to be transferred for Spanish language

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information. Specialized call center advisors have information regarding Lifeline service available.

- b. Outreach and educational efforts involving participation in community events.

RESPONSE: From time to time, Assurance Wireless promotes its Assurance Wireless-branded Lifeline service at community events that are targeted to potential Lifeline eligible customers.

- c. Outreach and educational efforts involving mass media (newspaper, radio, television).

RESPONSE: In addition to the Assurance Wireless website, Assurance engages in digital advertising through tactics like search engine marketing, social media, and partnerships.

- d. Copies of Lifeline outreach materials of your company.

RESPONSE: In addition to our website, please see Attachment 2 for copies of outreach materials.

- e. Any links on your company Web site that provides Lifeline information.

RESPONSE: Please refer to our website www.assurancewireless.com.

- f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

RESPONSE: Currently, Assurance Wireless is partnering with Medicaid providers in select states. We also have partnerships with other companies that service the low-income population, such as Propel which targets customers who use SNAP.

8. Did your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If yes, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

RESPONSE: No Lifeline service was provided through resale agreements.

9. Please identify how your company is satisfying the FCC's minimum service standards requirement.

RESPONSE: Assurance Wireless offers 350 voice minutes and 3 GB of data to all new customers in Florida, along with an Android phone.

10. To the extent you have experienced a decline in Lifeline customers since last year, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting Lifeline participation in Florida are welcome.

RESPONSE: In compliance with the federal Lifeline de-enrollment requirements, within the last year Assurance Wireless experienced a decline in Lifeline customers in the State of Florida.

11. Please identify any issues you have experienced utilizing the National Verifier.

RESPONSE: Assurance Wireless sometimes runs into issues with addresses when trying to enroll customers in the National Lifeline Accountability Database (NLAD), even though the customer was approved by the National Verifier. These are usually cases where the consumer fails because of a Duplicate Address and was not prompted by the National Verifier to complete the Independent Economic Household (IEH) worksheet.

12. Are you assisting customers with their Lifeline program applications through the National Verifier portal? If yes, please describe any issues you have experienced. If no, please describe your process for directing customers to apply with the National Verifier.

RESPONSE: Assurance Wireless continues to use field agents who assist consumers with the Lifeline application process. We have implemented the National Verifier API, which allows us to provide a more streamlined application process. This allows for a better customer experience through the National Verifier.

13. Are the majority of your new Lifeline customers already enrolled in the National Verifier before requesting Lifeline service from your company?

RESPONSE: No.

14. Since the hard launch of the National Verifier in Florida, how has your company used the customer information received from Florida's Coordinated Enrollment Process?

RESPONSE: No, Assurance Wireless does not participate in the Coordinated Enrollment Process.

15. In the last year, has your company filed for any form of bankruptcy? If yes, please identify the chapter and the date filed.

RESPONSE: No.

16. Within the last two years, has your company been involved in any FCC enforcement actions? If yes, please provide the FCC docket number.

RESPONSE: Within the last two years, the company has not been the subject of any FCC enforcement actions. After the company notified the FCC of the usage issue, the FCC released a public notice <https://docs.fcc.gov/public/attachments/DOC-359820A1.pdf> concerning the usage issue. The company has been cooperating with the FCC's inquiries regarding this issue.

17. Did you observe an increase in new Lifeline customers related to COVID-19 unemployment? Additionally, please provide or describe any form of promotion your company conducted to customers newly eligible for Lifeline due to COVID-19. Any additional general comments or information on how COVID-19 has affected your Lifeline customers in Florida are welcome.

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RESPONSE: Assurance Wireless has an increase in website visits and submitted applications during the March through April 2020 timeframe which has since dropped down to earlier levels.

In response to the National Coronavirus emergency, we provided new and existing Lifeline customers extra service from March 21, 2020 to July 6, 2020, as follows:

- All Lifeline customers received unlimited domestic calling, unlimited texting and an extra 20GB of data (extra 6GB from March 21 – April 8 and then the data was increased to 20GB from April 9 – July 6)
- Customers with smartphone devices had the option to switch to a hotspot plan starting April 9

18. With the merger of Sprint and T-Mobile, will Assurance Wireless continue to operate as a separate ETC providing Lifeline service? If no, please explain your business plan for the eventual dissolution or merger of Assurance Wireless into the T-Mobile business structure. Additionally, please provide an approximate timeline of when this would take place.

RESPONSE: Assurance Wireless will continue to operate as a separate ETC providing Lifeline service for the foreseeable future.

CONTACT PERSON FOR THIS FILING:

Bill Atkinson
Bill.Atkinson@t-mobile.com
(404) 493-0589

REDACTED
Schedule 1

**2020 Florida Lifeline Data Request
Assurance Wireless USA, L.P.**

REDACTED

SCHEDULE 1

	2. # of customers participating in Lifeline each month	# of customers participating in Link-Up each month ¹	4. # of customers denied Lifeline service	5. # of Lifeline customers added each month	# of Link-Up customers added each month ¹	6. # of Lifeline customers removed from Lifeline each month	7. # of customers participating in Transitional Lifeline each month	8. # of customers participating in Lifeline under Tribal Lands provision each month
Jul-2019	402,102	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Aug-2019	243,117	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Sep-2019	157,870	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Oct-2019	198,322	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Nov-2019	205,890	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Dec-2019	201,338	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Jan-2020	200,117	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Feb-2020	199,085	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Mar-2020	205,875	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Apr-2020	210,272	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
May-2020	221,051	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0
Jun-2020	222,128	N/A	REDACTED	REDACTED	N/A	REDACTED	REDACTED	0

1. Assurance Wireless USA, L.P. does not charge its Lifeline customers an activation fee, therefore, it does not participate in Link-Up.

ATTACHMENT 2



View our coverage maps for more information on your service.

To Purchase Data, [click here](#)

After signing into My Account click **Add on Data** under I Want To...

Get our Best Rates ever on Unlimited Talk & Text Plans with Data

For Smartphones				
	\$15 Plan	\$20 Plan	\$30 Plan	\$40 Plan
Minutes	Unlimited	Unlimited	Unlimited	Unlimited
Texts	Unlimited	Unlimited	Unlimited	Unlimited
Total Data	3.5GB	4GB	7GB	13GB
Plan Data	500MB	1GB	4GB	10GB
FREE Data	3GB	3GB	3GB	3GB

For Feature Phones:

- **\$30 Unlimited Talk, Text & Web** – Includes Unlimited Voice Minutes, Unlimited Texts and Unlimited Data at up to 3G high-speed data* each month. (*data may speeds vary)

To Purchase Unlimited Talk & Text Plans with Data [click here](#)

After signing into My Account click on **Add Minutes and Data Bundle** under I Want To...

Get FREE phone service. You may qualify if you are on certain public assistance programs, like Medicaid or Supplemental Nutrition Assistance Program (SNAP). You can also qualify based on your household income.



www.assurance-wireless.com

See if you qualify.

Like Comment Share

Medicaid, Food Stamps/SNAP or SSI? You may qualify for a FREE PHONE PROGRAM



www.assurance-wireless.com

See if you qualify.

Like Comment Share

Get FREE phone service. You may qualify if you are on certain public assistance programs, like Medicaid or Supplemental Nutrition Assistance Program (SNAP). You can also qualify based on your household income.



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See if you qualify.

Like Comment Share

Having trouble with your Assurance Wireless application?

Learn more about program eligibility and the documents you need to get approved for free cell service.



Tired of paying too much for cell service?

- Get free data and voice minutes, unlimited free texts, and a free smartphone from Assurance Wireless Lifeline service.
- Must qualify and use regularly.

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APPLY NOW

Is your cell phone bill too expensive?

Apply for Lifeline cell service from Assurance Wireless. If you qualify

- Get 2 GB data, unlimited texts, and 350 minutes every month for free, plus a free smartphone
- Use it every month

assurance-wireless.com

LEARN MORE