



1120 N.W. Couch Street, Tenth Floor
Portland, OR 97209-4128
PHONE: 503.727.2000
FAX: 503.727.2222
www.perkinscoie.com

Lawrence H. Reichman
PHONE: (503) 727-2019
FAX: (503) 346-2019
EMAIL: LReichman@perkinscoie.com

October 11, 2011

VIA E-MAIL

Administrative Law Judge Sarah Wallace
Public Utility Commission of Oregon
550 Capitol Street N.E., Suite 215
Salem, Oregon 97301-2551

Re: UM 1437; In the Matter of TracFone Wireless, Inc. Application for Designation as an Eligible Telecommunications Carrier

Dear Judge Wallace:

Paragraph 14 of the Stipulation filed by all parties in the above-captioned matter on June 10, 2011 requires TracFone to submit additional documents to the Commission prior to its designation as an ETC. For your reference, Paragraph 14 provides in full:

14. Prior to designation as an ETC, TracFone will submit to the Commission statements from its underlying carriers indicating:
- a) the ability of such carriers to remain operational in the event of emergencies; and,
 - b) that such carriers treat 9-1-1 calls from TracFone customers in the same manner as those carriers treat 9-1-1 calls from their own retail customers.

Also prior to designation as an ETC, TracFone will work with Staff to submit to the Commission an accurate map identifying TracFone's ETC and ETP designated service area, which will be consistent with Exhibit A and comply with initial designation requirement 3.1.1 in Appendix A of Order No. 06-292.

60904-0002/LEGAL21913597.1

ANCHORAGE · BEIJING · BELLEVUE · BOISE · CHICAGO · DENVER · LOS ANGELES · MADISON
MENLO PARK · PHOENIX · PORTLAND · SAN FRANCISCO · SEATTLE · SHANGHAI · WASHINGTON, D.C.

Perkins Coie LLP and Affiliates

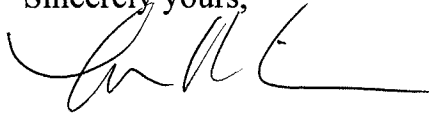
Administrative Law Judge Sarah Wallace
October 11, 2011
Page 2

In compliance with subsections (a) and (b) of Paragraph 14, TracFone hereby submits to the Commission the required statements from its three underlying carriers.

In addition, TracFone has provided Staff a map to comply with the final requirement of Paragraph 14, and will submit that to the Commission following Staff's review. Upon that submission, the Commission will have everything it needs to designate TracFone as an ETC and ETP. With that information provided, TracFone looks forward to prompt consideration of this matter by the Commission.

Thank you for your attention to this matter.

Sincerely yours,

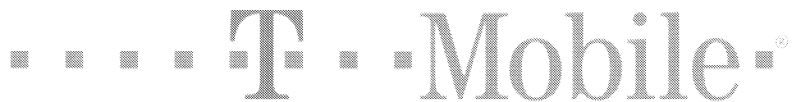
A handwritten signature in black ink, appearing to read 'L. Reichman', with a long horizontal flourish extending to the right.

Lawrence H. Reichman

LHR:dma

Enclosures

c: Service List



T-Mobile USA, Inc.
12920 SE 38th Street, Bellevue, WA 98006

Date: November 25, 2008
To: TracFone Wireless Inc.
From: T-Mobile USA, Inc.
Re: Routing of E911 Calls from Resold Wireless Services

T-Mobile USA, Inc. ("T-Mobile") provides licensed, facilities-based wireless services directly to customers and routes E9-1-1 calls from such customers to designated Public Safety Answering Points ("PSAP") in accordance with the law and pursuant to arrangements with PSAPs to receive such calls.

T-Mobile offers wholesale wireless services to TracFone Wireless, Inc. ("TracFone"), which resells such services to customers under its own brand on a prepaid basis.

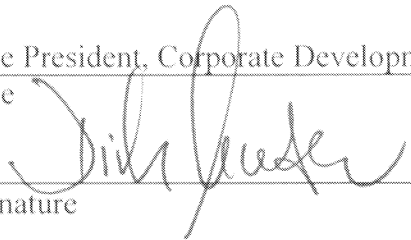
Any Tracfone customer whose service is activated on the T-Mobile network and who dials 9-1-1 will have the same access to E9-1-1 as a retail customer of T-Mobile.

Dirk Mosa

Name

Vice President, Corporate Development & Wholesale

Title



Signature



October 3, 2011

Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

Re: UM 1437 - TracFone Wireless, Inc. Application for Designation as an Eligible Telecommunications Carrier

To whom it may concern:

T-Mobile USA, Inc. ("T-Mobile") provides commercial mobile radio service to TracFone Wireless, Inc. ("TracFone"). We understand that TracFone has applied to the Public Utility Commission of Oregon for designation as an eligible telecommunications carrier for the limited purpose of providing Lifeline service to low-income Oregon households. We further understand that, if designated as an eligible telecommunications carrier, TracFone will provide Lifeline service, in part, by using services provided to it by T-Mobile. As part of a stipulation entered into by TracFone, Commission Staff, and several other parties, TracFone is required to provide to the Commission a statement from each of its underlying carriers indicating those carriers' ability to remain operational in the event of emergencies. This letter is intended to comply with that requirement.

T-Mobile has implemented in its wireless network such reasonable capabilities as it deems necessary to remain operational in emergencies. These include back-up power sources and other measures for the purpose of providing reliability, redundancy and diversity in order to remain operational in emergency situations.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Brad Duea', written over a horizontal line.

Brad Duea
Senior Vice President, Marketing
T-Mobile USA, Inc.

T-Mobile Legal Approval By:

A handwritten signature in blue ink, written over a horizontal blue line.



Verizon Wireless
1 Verizon Way
Basking Ridge, NJ 07920

Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

Re: **UM 1437 - TracFone Wireless, Inc. Application for Designation as an Eligible Telecommunications Carrier**

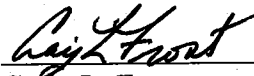
To whom it may concern:

Verizon Wireless provides wholesale commercial mobile radio service to TracFone Wireless, Inc. ("TracFone"), which resells such service to customers under its own brand on a prepaid basis.

We understand that TracFone has applied to the Public Utility Commission of Oregon for designation as an eligible telecommunications carrier for the limited purpose of providing Lifeline service to eligible Oregon households. We further understand that, if designated as an eligible telecommunications carrier, TracFone may provide Lifeline service, in part, by using cellular wireless services provided to it by Verizon Wireless.

Verizon Wireless takes significant precautions with the intent to minimize the possibility of disruption to our network locations, including redundancy designed into the equipment and circuitry, back-up batteries, permanent and portable generators, fire detection and suppression systems, and security systems for the buildings.

Very truly yours,

 10-11-2011
Craig L. Frost
Executive Director - Network
Verizon Wireless



Lane Mansell
Vice President
Partnership & Resale

AT&T Mobility
1025 Lenox Park Blvd
Atlanta, GA 30319

Date: April 14, 2009

To: All 911 Directors
Re: Routing of E911 Calls from Resold Wireless Services

Carrier provides licensed facilities-based wireless services directly to all of its customers and routes 911 calls from such customers to the Public Safety Answering Points (PSAPs) in accordance with applicable Federal Communications Commission ("FCC") enhanced 911 ("E911") legal requirements and pursuant to arrangements with PSAPs to receive such calls.¹

Carrier provides wholesale wireless service to TracFone Wireless, Inc. (TracFone), which resells such service to customers under its own brand on a prepaid basis.

As a wholesale customer of Carrier, TracFone has asked Carrier to certify that TracFone's Lifeline customers will have access to 911 and E911. In this regard, Carrier certifies that Carrier routes 911 calls according to applicable FCC E911 requirements and that it routes 911 calls from TracFone customers to PSAPs in the same manner as Carrier routes 911 calls from its own customers to PSAPs.

Carrier has engaged in 911 testing with PSAPs to confirm 911 and E911 access in accordance with applicable FCC requirements. Thus, as a resale customer of Carrier, TracFone customers have the same access to 911 and E911 as do Carrier's own customers.

Lane Mansell
NAME

Vice President – Partnership & Resale
TITLE


SIGNATURE

404-986-1035
PHONE

Lm1144@att.com
EMAIL

¹ "The basic 911 rules required covered carriers to deliver all 911 calls to the appropriate PSAP...they are designed to ensure the appropriate delivery of 911 calls.... [E]nhanced 911 rules require covered wireless carriers to be capable of delivering the calling party's call back number and the calling party's location information to the requesting PSAPs. *In the Matter of IP-Enabled Services: E911 Requirements for IP-Enabled Service Providers*, FCC 05-116 at p. 8, note 18, (June 3, 2005) describing the difference between basic 911 and E911 service.

September 29, 2011

Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

Re: UM 1437 - TracFone Wireless, Inc. Application for Designation as an Eligible Telecommunications Carrier

To whom it may concern:

AT&T Mobility LLC ("AT&T") provides commercial mobile radio service to TracFone Wireless, Inc. ("TracFone"). We understand that TracFone has applied to the Public Utility Commission of Oregon for designation as an eligible telecommunications carrier for the limited purpose of providing Lifeline service to low-income Oregon households. We further understand that, if designated as an eligible telecommunications carrier, TracFone will provide Lifeline service, in part, by using services provided to it by AT&T. We have been informed that as part of a stipulation entered into by TracFone, Commission Staff, and several other parties, TracFone is required to provide to the Commission a statement from each of its underlying carriers indicating those carriers' ability to remain operational in the event of emergencies. This letter is intended to comply with that requirement.

AT&T has implemented in its wireless network reasonable recovery capabilities to remain operational in emergencies. These include back-up power sources and other measures for the purpose of providing reliability, redundancy and diversity in order to remain operational and to minimize outages in emergency situations.

Very truly yours,



Stacy DeCesaro
Director – Sales Operations
AT&T Mobility LLC