

## SCOTT Annette

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**From:** Stephen Athanson <SATHANSON@tracfone.com>  
**Sent:** Thursday, July 14, 2016 12:08 PM  
**To:** PUC.FilingCenter  
**Subject:** RE: TracFone Form 481 Filing - Docket UM-1768  
**Attachments:** TracFone\_539013\_OR(2017\_Form481\_ADDM).pdf

On June 30th, 2016, TracFone Wireless Inc. filed with your office the required FCC Form 481 pursuant to 47 CFR 54.422. Acting under direction from the Universal Service Administrative Company (USAC), TracFone did not submit information in certain fields of the form for states in which Lifeline is subject to state regulation. These fields included information for Lines 420 (Complaints per 1000 customers for mobile voice), 510 (DESCRIPTION OF COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION), and 610 (FUNCTIONALITY IN EMERGENCY SITUATIONS). While USAC has stated that this information does not need to be provided as part of the federal filing, it is less clear whether the information should be included in the separate state filings. As a precautionary measure, and to ensure there is no question as to TracFone's adherence to the requirements of 47 CFR 54.422, TracFone is filing the attached supplement to the FCC Form 481 filings previously submitted, which includes the information for the three fields identified above.

If you have any questions on this matter, please contact me at [sathanson@tracfone.com](mailto:sathanson@tracfone.com) or (305) 715-3613.

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**From:** Stephen Athanson  
**Sent:** Thursday, June 30, 2016 1:27 PM  
**To:** 'PUC.FilingCenter@state.or.us'  
**Cc:** Janet Morejon; Claudia Ugaz Aponte; Amar Eldaher  
**Subject:** RE: TracFone Form 481 Filing

Attached for filing in Docket UM-1768 is a copy of the TracFone FCC Form 481 filing. An original and copy are also being submitted by regular mail. Please contact me if there are any questions.

**Stephen Athanson**  
**Regulatory Counsel**  
**TracFone Wireless Inc.**  
**9700 N.W. 112th Ave.**  
**Miami, FL 33178**  
**(305) 715-3613**  
**(786) 449-6807 (mobile)**



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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	539013
<015> Study Area Name	TracFone Wireless Inc.
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Janet Morejon
<035> Contact Telephone Number - Number of person identified in data line <030>	3057156522 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jmorejon@tracfone.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	TracFone Wireless Inc.
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/27/2016</span>
Printed name of Authorized Officer:	Javier Rosado
Title or position of Authorized Officer:	Sr. Officer Bus. Dvlpmt & Govmt Svcs
Telephone number of Authorized Officer:	3057156575 ext.
Study Area Code of Reporting Carrier:	539013 <span style="float: right;">Filing Due Date for this form: 07/01/2016</span>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TRACFONE WIRELESS INC**  
**2016 FCC FORM 481**  
**SPIN: 143030103**

**RESPONSE TO (420) COMPLAINTS PER 1000 CUSTOMERS FOR MOBILE VOICE**

(010) **Study Area Code: 539013**  
(015) **Study Area Name: Oregon**  
(020) **Program Year: 2017**  
(030) **Contact name: Janet Morejon**  
(035) **Contact Telephone Number: 305-715-6522**  
(039) **Contact Email Address: jmorejon@tracfone.com**

[Number of Complaints \(per 1,000 customers\) for the Period 01/01/2015 - 12/31/2015](#)

**5.21**

(420)

**TRACFONE WIRELESS INC**  
**2016 FCC FORM 481**  
**SPIN: 143030103**

**RESPONSE TO (510) DESCRIPTION OF COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION:**

- (010) **Study Area Code: 539013**
- (015) **Study Area Name: Oregon**
- (020) **Program Year: 2017**
- (030) **Contact name: Janet Morejon**
- (035) **Contact Telephone Number: 305-715-6522**
- (039) **Contact Email Address: jmorejon@tracfone.com**

**[Certification of compliance with CTIA Consumer Code for Wireless Service](#)**

- (510) **[TracFone certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA – The Wireless Association® Consumer Code for Wireless Service, as it is required to do pursuant to Section 54.202\(a\)\(3\) of the Federal Communications Commission’s rules \(47 C.F.R. § 54.202\(a\)\(3\)\).](#)**

**TRACFONE WIRELESS INC  
2016 FCC FORM 481  
SPIN: 143030103**

**RESPONSE TO (610) FUNCTIONALITY IN EMERGENCY SITUATIONS:**

- (010) **Study Area Code: 539013**
- (015) **Study Area Name: Oregon**
- (020) **Program Year: 2017**
- (030) **Contact name: Janet Morejon**
- (035) **Contact Telephone Number: 305-715-6522**
- (039) **Contact Email Address: jmorejon@tracfone.com**

**[Certification that the ETC is able to function in emergency situations](#)**

- (610) **TracFone certifies that it will be able to function in emergency situations to the extent that its underlying network providers are able to do so. TracFone provides service using the networks from the several of the leading wireless companies in the nation, including Verizon Wireless, AT&T Mobility, and T-Mobile. TracFone relies on those network's reliability in all situations, including emergency situations. Each of those companies complies with applicable requirements for emergency service, including available power supplies. Those network operators have implemented state-of-the-art network reliability standards and TracFone and its customers benefit from their high standards. Throughout is more than ten years of existence, TracFone's service reliability has compared favorably with that of any facilities-based operator in the wireless telecommunications industry.**