

DOCKET NO. UM 1726

**Cover Sheet for Submission of
2015 Annual ETC Certification Reports**

Name of Eligible Telecommunications Carrier: **Virgin Mobile USA, L.P.**

Filing date: **June 24, 2015**

Is this: Original submission? **X**
OR
Revised submission? _____

Person to contact for questions:

Name **Kristin L. Jacobson**

Phone number **707-816-7593**

E-mail address **kristin.l.jacobson@sprint.com**

Documents included in this filing (please check applicable items):

- _____ CAF/ICC Support (47 CFR § 54.304)
_____ Rate Floor Data (47 CFR § 54.313(h))
X Form 481 (High-cost per 47 CFR § 54.313, Low-income per 54.422)¹
_____ Form 690 (Mobility Fund per 47 CFR § 54.1009)
_____ Affidavit for High-Cost Support

Filing deadlines: The deadlines for filing items required by 47 CFR § 54 are the same as the deadlines for filing with the FCC. The notarized affidavit for high-cost support must be filed no later than the due date for the FCC Form 481. Based on current information, it appears that all items other than CAF/ICC support data are due by **July 1, 2015**. The CAF/ICC support data are due the same day as the ETC's interstate access tariff filing.

If revisions to an original submission are filed with the FCC or USAC, a copy of the revisions must be filed with the Oregon Commission no later than five business days following submission to the FCC or USAC.

¹ Lifeline-only ETCs must provide all information specified in 47 CFR § 54.422(b) even if the ETC does not submit this information to the FCC.

DOCKET NO. UM 1726

FILING INSTRUCTIONS

Please file submissions in Docket No. UM 1726. You do not need to include a cover letter if you use the cover sheet. Please fill in all relevant information.

Filings must be electronically submitted to the PUC Filing Center. You may e-mail documents to puc.filingcenter@state.or.us. Please note that the upload process is no longer an option for filing. See the PUC website for further instructions. If selected portions of documents, e.g., network plans, are to receive confidential treatment, those portions should not be filed electronically. You may electronically file redacted versions of documents containing confidential information, but then follow-up by sending full versions including confidential information printed on yellow paper.

After filing electronically, please send two hard copies of the filing package (cover sheet and filed information) to the PUC Filing Center. Be sure to include the original affidavit with the raised seal or notary's mark evident. Hard copies of confidential material should be filed in accordance with confidential designation requirements described in OAR 860-011-0080.

Regular delivery methods may be used to send all hard copy documents; overnight or express delivery is not necessary. As the Commission will be moving to new offices at the end of June, please send hard copy documents to the Filing Center via US mail using the following post office box address:

Public Utility Commission of Oregon
Attn: Filing Center
PO Box 1088
Salem, OR 97308-1088

If you have any questions regarding the reporting requirements, please contact Kay Marinos at 503-378-6730 or send an e-mail to Kay.Marinos@state.or.us.

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	539011
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Andrew M. Lancaster
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	andy.m.lancaster@sprint.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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			(check box when complete)	
<100>	Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>		
<200>	Outage Reporting (voice)	<i>(complete attached worksheet)</i>		✓
<210>	<input type="checkbox"/> <-- check box if no outages to report			
<300>	Unfulfilled Service Requests (voice)			
<310>	Detail on Attempts (voice)	<i>(attach descriptive document)</i>		
<320>	Unfulfilled Service Requests (broadband)			
<330>	Detail on Attempts (broadband)	<i>(attach descriptive document)</i>		
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	<input type="checkbox"/>		✓
<420>	Mobile	<input type="checkbox"/>		
<430>	Number of Complaints per 1,000 customers (broadband)			
<440>	Fixed	<input type="checkbox"/>		
<450>	Mobile	<input type="checkbox"/>		
<500>	Service Quality Standards & Consumer Protection Rules Compliance		<i>(check to indicate certification)</i>	✓
<510>	<input type="checkbox"/> 539011OR510 .pdf	<i>(attached descriptive document)</i>		✓
<600>	Functionality in Emergency Situations		<i>(check to indicate certification)</i>	✓
<610>	<input type="checkbox"/> 539011OR610 .pdf	<i>(attached descriptive document)</i>		✓
<700>	Company Price Offerings (voice)		<i>(complete attached worksheet)</i>	
<710>	Company Price Offerings (broadband)		<i>(complete attached worksheet)</i>	
<800>	Operating Companies and Affiliates		<i>(complete attached worksheet)</i>	✓
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input type="radio"/>		<i>(if yes, complete attached worksheet)</i>	
<1000>	Voice Services Rate Comparability Certification		<input type="checkbox"/>	
<1010>	<input type="checkbox"/>		<i>(attach descriptive document)</i>	
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input type="radio"/> <input type="radio"/>		<i>(if not, check to indicate certification)</i>	
<1110>			<i>(complete attached worksheet)</i>	
<1200>	Terms and Condition for Lifeline Customers		<i>(complete attached worksheet)</i>	✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet		
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		
<2000>		<i>(check to indicate certification)</i>
<2005>		<i>(complete attached worksheet)</i>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet		
<3000>		<i>(check to indicate certification)</i>
<3005>		<i>(complete attached worksheet)</i>

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	539011
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035> Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	
--	--

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	
<114> Report how much universal service (USF) support was received	
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	539011
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@print.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	539011
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035> Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	539011
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.assurancewireless.com/Public/TermsandConditions.aspx>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code _____
 <015> Study Area Name _____
 <020> Program Year _____
 <030> Contact Name - Person USAC should contact regarding this data _____
 <035> Contact Telephone Number - Number of person identified in data line <030> _____
 <039> Contact Email Address - Email Address of person identified in data line <030> _____

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband
- Connect America Phase II Reporting (47 CFR § 54.313(e))**
- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation FCC Form 481
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3090-0619
July 2013

<010> Study Area Code 539011
 <015> Study Area Name Virgin Mobile USA LP
 <020> Program Year 2013
 <030> Contact Name - Person USAC should contact regarding this data Andrew M. Lancaster
 <035> Contact Telephone Number - Number of person identified in data line <030> 3137526107 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> andy.m.lancaster@vprint.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
 Milestone Certification (47 CFR § 54.313(f)(1)(i)) Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) **Community Anchor Institutions** (47 CFR § 54.313(f)(1)(ii)) Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No) Yes No

(3014) If yes, does your company file the RUS annual report (Yes/No) Yes No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires.

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No) Yes No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued) FCC Form 481
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	539011
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107_ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

Financial Data Summary

(3027) Revenue	<input type="text"/>
(3028) Operating Expenses	<input type="text"/>
(3029) Net Income	<input type="text"/>
(3030) Telephone Plant In Service(TPIS)	<input type="text"/>
(3031) Total Assets	<input type="text"/>
(3032) Total Debt	<input type="text"/>
(3033) Total Equity	<input type="text"/>
(3034) Dividends	<input type="text"/>

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	539011
<015> Study Area Name	Virgin Mobile USA LP
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<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

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

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
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: Virgin Mobile USA LP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/16/2015
Printed name of Authorized Officer: Jay Franklin	
Title or position of Authorized Officer: Assistant Controller	
Telephone number of Authorized Officer: 9134997864 ext.	
Study Area Code of Reporting Carrier: 539011	Filing Due Date for this form: 07/01/2015
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.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	539011
<015>	Study Area Name	Virgin Mobile USA LP
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<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
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.	

Attachments

Meredith Attwell Baker
President/CEO

July 1, 2014

Mr. Dan Hesse
Chief Executive Officer
Sprint Nextel Corporation
6200 Sprint Parkway
Mailstop: KSOPHF0410-4A421
Overland Park, KS 66251

Dear Dan:

Congratulations! This letter is to notify you that Sprint Nextel Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2014 – December 31, 2014, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or maltschul@ctia.org.

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,



Meredith Baker

cc: Charles McKee, VP Government Affairs

Attachment

SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

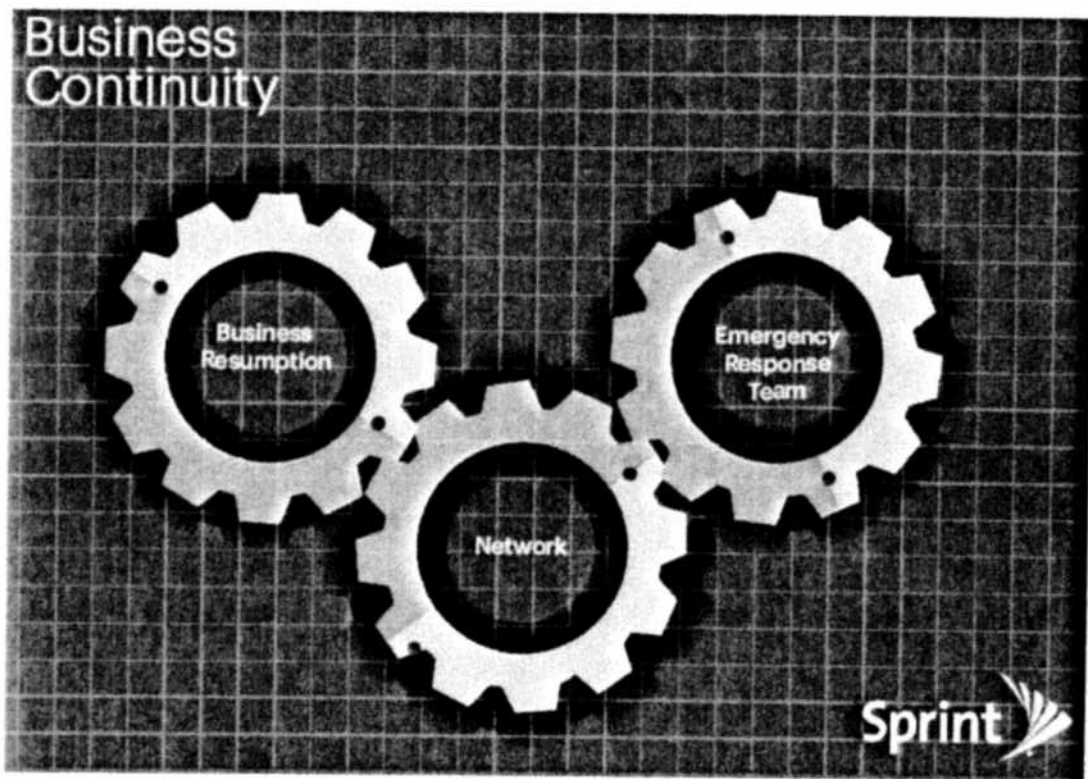
Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

Sprint Business Continuity Program Overview



Document Information and Revision History

File Name	Sprint Business Continuity Program 2015
Current Revision Author(s)	Customer Sharing subcommittee 2015
Overall Plan Owner	Director of Business Continuity at Sprint

Change Control

Listing of current year's changes, previous changes are available by contacting the Business Continuity Office.

Change Description	Name	Date
Removed reference to full functional exercises	Shah Daneshkhah	May 18, 2015
Added document owner information-NSA compliance	BCO	May 19, 2015
Corrected NCS to NCC	Chuck Brownawell	May 21, 2015
National Security and Compliance Team functions	Chuck Brownawell	May 22, 2015

Business Continuity Office On-Call Contact

Title	Phone	Email
Business Continuity Office Point of Contact	1-877-747-2124	bco@sprint.com

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Executive Summary

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of business continuity has never been more important. Sprint takes business continuity to the next level by ensuring that it is part of the corporation's business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees in their daily business operations to assure the continuation of Sprint's mission critical business operations and services. The goal of Sprint's Business Continuity (BC) Program is to minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Industry accepted principles are the basis for Sprint's Business Continuity (BC) Program. Sprint has adapted key principles from the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, and several Military Specifications (Mil-Spec) standards, into three BC Program Elements: Program Governance, Incident Management, and Continuity Analysis & Planning.

Program Governance

Program Governance Structure– Program structure, mandate and executive sponsorship is required to ensure a comprehensive Business Continuity Program.

Program Management & Continuous Improvement - Overall program management and continuous improvement includes all of the documentation and efforts designed to ensure a well-defined BC program that seeks to continually mature performance and processes.

Incident Management

Incident Management & Crisis Communications – Enterprise Incident Management Team (EIMT) and Incident Management Team (IMT) documentation, training, exercises and continuous improvement are required for those teams that have roles and responsibilities before, during or after an incident that significantly affects Sprint's employees, customers and/or shareholders.

Criticality Analysis & Risk Mitigation Strategies

Criticality Analysis & Risk Management – Criticality Rating is necessary for prioritizing tasks and recovery. Risks that threaten the company's critical functions, vendors, sites, systems and network elements, require due diligence that result in decisions to mitigate or accept the risks.

Mitigation Strategies & Plan Development - After determining criticality and risks, the next steps include devising the appropriate mitigation strategies and recovery capabilities. BC plan development is formalized using on-line tools.

Sprint's Business Continuity Program Has C-Level Sponsorship

A comprehensive business continuity program requires executive sponsorship, a structure for decision-making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint. The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

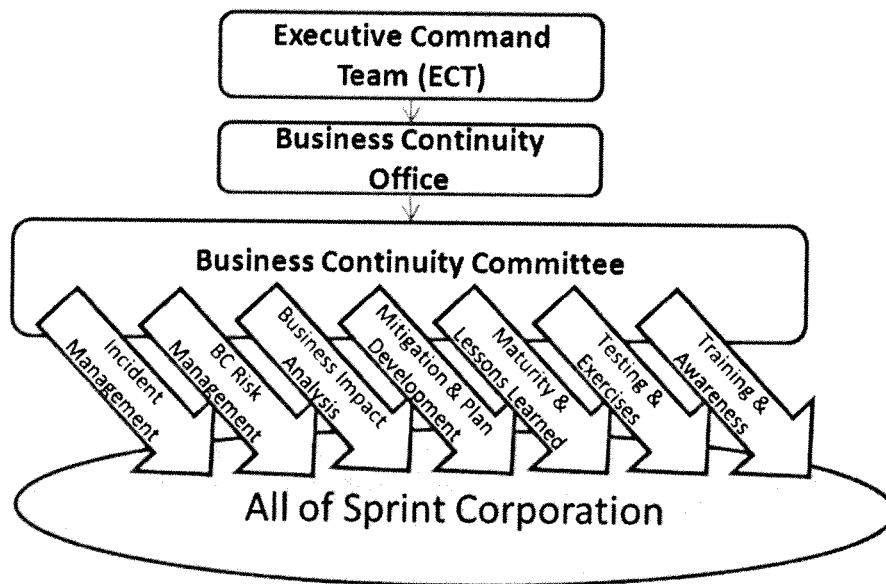
Executive Command Team (ECT) - The ECT consists of Sprint's highest-level executives, representing all critical Sprint functions. The ECT receives briefings on issues and status of projects that require

senior executive attention and provide executive sponsorship to the overall Business Continuity Program.

Business Continuity Office (BCO) - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery Plans. During an incident, the BCO is responsible for coordinating cross-functional incident management activities of the Enterprise Incident Management Team (EIMT).

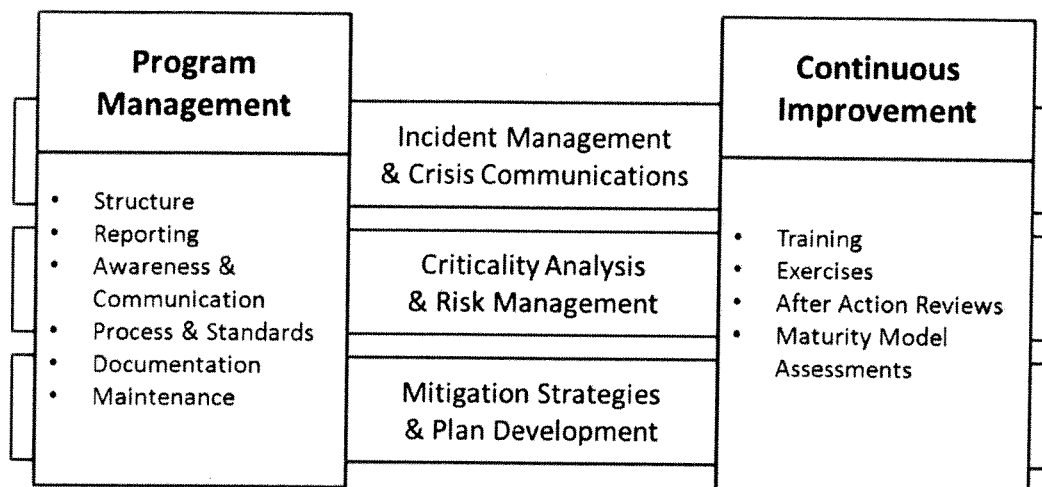
Business Continuity Committee (BCC) – The BCC is comprised of Business Continuity Teams (BCTs). Consistency across the company for assuring business continuity policies, guidelines, standards and tools are the responsibility of the BCC. BCTs have overall responsibility for the implementation of business continuity initiatives within their individual business units and act as business unit Incident Management Teams (IMT) for their business units when disasters occur. The BCC has various sub-committees that focus on proactive planning, incident management, tools and training, awareness, pandemic planning and other issues that require attention.

Program Governance Structure



Program Management & Continuous Improvement Is Essential

The concepts of program management and continuous improvement are the overarching control elements that bookend all other aspects of the BC Program. For each of the other Program Elements, Program Management efforts will provide definition of what the Program Element should accomplish and the methods used to achieve objectives. The continuous improvement efforts provide a means to keep the program elements evergreen, current, and striving for maturity.



Program Management:

- Awareness & Communications – Employees and management are informed of current business continuity efforts or awareness campaigns through internal communication methods that often target all employees in the company.
- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All key stakeholders are responsible for reviewing programs documents at least annually.
- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.

Continuous Improvement:

- Training – To ensure familiarity with systems, processes and peer organizations use annual training cycles in addition to ad-hoc, training has new team members are added or procedure changes.
 - Exercises – Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are tabletop, walk-through, and functional drills.

Tabletop Exercises - In a round-table setting, members of the response team meet to discuss their responsibilities and describe how they would react as a team to an emergency scenario. They identify areas of overlap and confusion in a cost-effective and efficient manner.

Sprint

Walk-Through Drills - Both management and the response team perform their emergency functions within the emergency response location.

Functional Drills - Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should be tested separately to help identify improvement areas and to eliminate confusion. Observers are often used to evaluate these exercises.

- After Action Reviews (AARs) – Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity – Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Sprint's Incident Management & Crisis Communications Teams Are Continually Trained

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to all major disasters impacting the United States in the last 13 years.

Executive Command Team (ECT) – During a disaster, the ECT is kept apprised of all activities and status. If the incident requires chief executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions. The Chief Executive Officer (CEO) is the Chairperson of the ECT.

Enterprise Incident Management Team (EIMT) – The Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and built on the premise of an all-hazards response approach.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. Examples of IMTs include IT, Network, Human Resources, Customer Care, Corporate Security and others. In all, there are 16 IMTs, each of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT have a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

National Security & Compliance (NSC)

The NS&C team works to improve the physical and cybersecurity of Sprint's critical infrastructure networks and facilitates information sharing within and across the communication industry as well as with the government. Today's threat environment reminds us of our imperative to protect our Nation's critical functions that support national and economic security and public safety. A partnership leveraging public and private sector capabilities is essential for providing a realistic approach for protection and response.

The NS&C team is the primary point of contact to the Department of Homeland Security during times of increased threat and attack and during significant all hazards events. Members of the NS&C team serve as Sprint's onsite representatives at the Department of Homeland Security's National Coordinating Center (NCC) for Communications to provide a line of communication between corporate leadership, other telecommunication providers and government officials. This public / private partnership supports the mission of the NCC who leads emergency communications response and recovery efforts under Emergency Support Function #2 of the National Response Framework.

Sprint Conducts Criticality Analysis & Develops Risk Mitigation Strategies for All Aspects of the Business

Sprint formally analyzes risks and criticality of all parts of the business that could cause impacts or disruptions, if not properly mitigated and planned. These elements of the program ensure the proper priority and attention is applied to mitigation and plan development efforts.

Criticality Analysis:

Through various forms of analysis, such as Business Impact Analysis (BIA), criticality of business processes, applications, vendors, sites, network elements and other business aspects are determined. The criticality defines the appropriate level of mitigation and planning that is necessary. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies.

Risk Management:

Sprint considers resiliency and business continuity risks to be a matter that requires tight management and controls. Determining appropriate mitigation and business continuity planning efforts based on evaluating potential risks using an internal algorithm.

Mitigation Strategies & Plan Development:

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. In most cases, the risks are marginalized or eliminated due to mitigation efforts. In some cases, the risks are highly improbable, but still require alternative planning, in the event that it should occur.

Sprint's New Network Is Built for Survivability and Speed

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team

Network Services' implementation of the Incident Command System (ICS), stays true to the principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures, to communicate efficiently internally and with customers such as Public Safety agencies as many of these agencies utilize ICS as well. Teams train on and deploy in standard ICS sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as ruggedized GPS-enabled phones, wireless modems custom applications, M2M solutions, and smart phones to aid in response communication, situation assessment and resource tracking. The teams also maintain a pool of Satellite phones as a contingency for use in restoration. Teams continue to create innovative response tools, such as the unique backhaul Satellite Cell on Light Trucks (SatCOLTs) that enable restoration of service when a traditional backhaul is not available.

The Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation). A virtual Emergency Operations Center (EOC) is established and performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

Cell Site Disaster Planning

Sprint's priority site restoration plan focuses resources and expedites recovery partly by making sure that existing infrastructure is operating properly under normal circumstances and by having a response plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. Sprint maintains a fleet of mobile generators deployable to Sprint service areas. Formal cell site classification designates all sites as critical, coverage and capacity sites. These prioritizations aid in properly allocating response personnel, generators and other resources.

Cellular Network Disaster Planning

Communications from Sprint cell sites are backhauled with various combinations of ethernet, copper, fiber, and microwave systems. Most Sprint hub locations are placed on bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures, or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site. Also in an effort to minimize service impact when a site is down, Sprint maintains a fleet of Cell Sites on Wheels (COWs) which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Switch locations have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes that readily connect the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts

The performance of Sprint's networks is monitored 24 hours a day, 7 days per week, and 365 days a year by the Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained.

Network Restoration Prioritization

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established cell site classification and service restoration process.

Special Event Planning

Special events have the potential for adversely affecting the customer experience due to greatly increased wireless traffic demands. Sprint has a formal mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events for future planning, and proactively search for one-time special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has leveraged its experience in managing very large temporary users at NASCAR events in managing special events. As a specialized type of special event, Sprint also interfaces with the NCC (National Coordinating Center for Communications) in managing capacity needs at National Special Security Event, NSSE.

Sprint's Information Technology Is Resilient and Redundant

Information Technology Incident Management Team

The IT Incident Management Team (IT IMT) proactively integrates business continuity methodology into every phase of IT Operations business processes in order to facilitate rapid response and resolution to any critical Business disruption. The IT IMT process is developed to minimize the incident duration, expedite and control the recovery efforts. The IT IMT provides a structured approach for responding to unplanned incidents that threaten an IT infrastructure, which includes hardware, software, networks, processes and people.

During day-to-day operations, IT IMT is managed by and reports up through the IT line of business. The IT IMT is responsible for business continuity planning for all IT assets located in Data Centers, Sprint owned Call Centers, Retail Stores and general office facilities.

Information Technology Application Recovery Strategy

IT IMT identifies and prioritizes the recovery of IT applications by using the Design for Criticality' (D4C) process which follows the business strategy of "Serve, Sell, Bill, Report". This criterion allows IT to assess and align each application based on the business function and impact to Sprint to a Design Class. An Application Alignment process will be used to determine the priority of the application in the recovery timeline. These priorities relate to the tolerance level of the applications and systems to the length of downtime after a disaster.

Data Center Resiliency Planning

Sprint data centers containing IT assets are managed by IT resources are in scope for IT IMT planning and testing initiatives. The Sprint Data Centers are held to exceptionally high and stringent industry, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and serve as alternate site failovers for each other. Strategic IT vendors critical to Sprint operations are in scope for IT CPR planning solutions.

Sprint Owned Call Center IT Resiliency Planning

Call Centers have proven failover processes. ITCPR is responsible for providing the centers with recovery planning for IT assets such as:

- Network
- Desktop
- Server
- Voice Technologies

Sprint Retail Store IT Resiliency Planning

ITCPR provides support to Retail facilities by leveraging existing Sprint strategies to ensure functionality and communications between stores and the Sprint Enterprise

Sprint's Workforce Has Remote Work and Alternate Site Capabilities

Employee Continuity Overview

Sprint has implemented a strategic employee continuity plan that anticipates and prepares in the event there is a significant and sustained absenteeism. Examples include a pandemic, or infectious disease that poses life-threatening risks to employees and their families or an unplanned school closing due to a natural disaster or a man-made incident requiring parents to be absent from the work place.

Sprint's plan allows for flexibility and scalability to adjust to changing events. The plan also incorporates a wide range of strategies that are available for the business units while ensuring communication and information sharing on status and success.

Alternate Site and Remote Access Overview

Sprint utilizes information obtained through business impact analysis and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event.

Sprint's Emergency Response Team (ERT) Is Ready to Serve

Who is the ERT?

The Sprint Emergency Response Team (ERT) is the first of its kind and was created in 2002. It has conducted more than 6,100 deployments, participated in over 300 training exercises, and provided emergency wireless support for close to 2,500 events.

Sprint's ERT is an experienced cross functional group, which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country. The ERT provides wireless telecommunications equipment, infrastructure and personnel operations support to federal, state and local public safety, law enforcement, military agencies and private sector organizations during declared emergencies, field training exercises, agency specific short term communication needs and National Special Security Events.

Support for Urgent Crisis Needs

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint's products and services. The ERT fully supports high volume, short notice voice and data communication needs of emergency, disaster personnel and communication liaisons with its SatCOLTs (Satellite Cell on Light Truck), Satellite IP VSAT Equipment, satellite earth stations, and inventory of over ten thousand handsets, aircards and mobile hotspots, which can be rapidly deployed to support short-term communications.

ERT in the EOCs

During a number of recent disasters, ERT reservists staffed State and Local Emergency Operations Centers (EOC) to relay first-hand information back to agencies that rely on critical communications. Having reservist representation at EOC's is valuable for a number of reasons: Reservists provide real time information and status updates to the EOC's on the progress of our network recovery efforts ; Allows State EOC's to provide direction on priority areas for Network restoration; Coordinate information from other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of



FEMA and other emergency responder command posts using Sprint handsets to help plan for influx of capacity needs. The EOC initiative is an example of Sprint's proactive approach during an incident, through partnership, involvement and communications support. Partnering with Emergency Management agencies in cities and counties throughout the United States provides better coordination of Sprint and ERT support resources for Disaster Preparation and Response. Trained ERT Reservists are more actively involved in providing their communities with critical volunteer support. Agencies are able to have a direct channel into Sprint approved support organizations with more expedited response times and capabilities, providing critical communications support when needed the most.

Contact The ERT:

For more information on Sprint's Emergency Response Team, please visit us at www.sprint.com/ert, become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam email us at ERTRequests@sprint.com or for emergency communications support, contact our 24x7x365 ERT Hotline at 1-888-639-0020 or for GETS users 254-295-2220.