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April 16, 2012

VIA EMAIL AND U.S. MAIL

Allan J. Arlow
Administrative Law Judge
Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

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

Dear Judge Arlow:

As you know, on June 10, 2011, all parties to this proceeding filed a Stipulation resolving all issues in the proceeding and requesting the Commission to issue an order approving the Stipulation and TracFone's Application, subject to the terms and conditions stated in the Stipulation. The parties filed Joint Testimony in support of the Stipulation on June 17, 2011. The Commission then stayed further proceedings in this docket because it decided that permanent amendments to the Commission's rules were required in order to grant some of the waivers requested in the Stipulation. The Commission concluded that rulemaking proceeding (Docket AR 554) in September 2011 – more than seven months ago. Subsequently, TracFone made all of the compliance filings required by the Stipulation.

In February 2012, the FCC issued Order 12-11 (the "Lifeline Reform Order"). Among other things, the Lifeline Reform Order made certain revisions to Lifeline funding levels. The Joint Testimony had referenced the sources of financial support for Lifeline service as they existed as of the date of the Stipulation, which have changed to some extent. Accordingly, the parties have prepared and executed a Supplemental Stipulation, filed on this date, in which TracFone reaffirms its commitments to offer specific service plans and to provide support for Lifeline customers from its own funds. TracFone also agrees to comply with all future applicable rules and regulations and to work with Staff to implement the requirements

60904-0002/LEGAL23376503.1

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of the Lifeline Reform Order. In addition, the Supplemental Stipulation confirms that TracFone has made all of the required compliance filings and requests that the Commission approve the Stipulation and TracFone's Application as soon as possible.

Commission approval of the Stipulation before it and designation of TracFone as an ETC pursuant to the terms of that Stipulation will bring to low-income Oregon households choices of Lifeline service in general and wireless Lifeline service in particular never before available in Oregon. Currently, TracFone is providing its SafeLink Wireless® Lifeline service as a designated ETC in more than 35 other states. More than 3.8 million customers are enrolled in the program and are enjoying the security and convenience of mobile telecommunications service which they could not otherwise afford. Consumers use TracFone's Lifeline service to stay connected with family and friends, employers and potential employers, government agencies and, perhaps most important, emergency services and health care providers.

Among other thing, the Lifeline Reform Order implements measures to preserve the availability of Lifeline support to those who need it while preventing waste, fraud, and abuse of Universal Service Fund resources. The terms of the Stipulation submitted in this proceeding are fully consistent with the FCC's requirements. Indeed, certain of the FCC's most important reforms were proposals made in that proceeding by TracFone. First among the goals articulated by the FCC in the Lifeline reform proceeding is "ensuring the availability of voice service for low-income Americans." Prompt approval of the Stipulation which has been before the Commission since June 2011 and designation of TracFone as an ETC for the purpose of providing Lifeline will help make that goal a reality to thousands of low-income Oregon households.

For these reasons, and with submission of this Supplemental Stipulation, we respectfully ask that the Commission promptly approve the proposed Stipulation and designate TracFone as an ETC in accordance with the terms of that Stipulation at the earliest possible time.

Thank you for your attention to this matter.

Sincerely yours,



Lawrence H. Reichman

CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of April, 2012, served the foregoing **LETTER TO ADMINISTRATIVE LAW JUDGE ALLAN J. ARLOW** upon all parties of record in this proceeding by causing a copy to be sent by electronic mail:

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