

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

VIRGIN MOBILE USA, L.P.,

Petition to Modify Eligible
Telecommunications Carrier Designated
Service Area

Docket No. UM 1522

**APPLICATION TO MODIFY ELIGIBLE TELECOMMUNICATIONS CARRIER
AND ELIGIBLE TELECOMMUNICATIONS PROVIDER SERVICE AREA**

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BACKGROUND

Virgin Mobile USA, L.P. (“Virgin Mobile” or the “Company”), a wholly-owned subsidiary of Sprint Communications (“Sprint”) submitted a Petition for Limited Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Oregon on February 1, 2011, pursuant to § 214(e)(2) of the Communications Act of 1934, as amended (“Act”), for purposes of offering prepaid wireless services supported by the Universal Service Fund’s (“USF”) Lifeline program. On April 8, 2011, Virgin Mobile submitted an Application to provide services as an Eligible Telecommunications Provider (“ETP”) pursuant to the Oregon Telephone Assistance Program (“OTAP”), as amended on December 14, 2011. The Oregon Public Utility Commission (“Commission” or “OPUC”) issued Order No. 12-015 on January 23, 2012, granting Virgin Mobile ETC and ETP status, finding that Virgin Mobile met all of the necessary requirements for ETC designation under § 214(e)(1) of the Communications Act of 1934, as amended (“Act”), 47 U.S.C. § 214(e)(1) to offer services supported by the Lifeline program and satisfied the Commission’s ETC requirements¹ and ETP requirements,² with five exceptions and subsequent waivers.

I. INTRODUCTION

Approximately four years later, on December 1, 2015, in Order No. 15-382, in Docket UM 1648, the Commission authorized ETC applicants to use alternative geographic units for the description of designated service areas, including the use of zip codes. The Commission explained that, “Previously, service areas were defined by ILEC wire centers, but changes in technology and FCC requirements have made this standard less relevant and unnecessarily burdensome to non-ILEC ETCs.”³ The Commission provided further guidance to ETC

¹ These are set forth in Appendix A to Order No. 06-292 in UM 1217 (“*ETC Checklist*”).

² OAR Chapter 860, Division 033; Residential Service Protection Fund (the “RSPF Rules”).

³ See Docket No. UM 1648, *In the Matter of Public Utility Commission of Oregon, Staff Investigation into Eligible Telecommunications Carriers’ Requirements*, Order No. 15-382 at 4 (December 1, 2015).

applicants by explaining that, "...under the proposed revisions to Appendix A of Order No. 06-292, other applicants may now use a variety of descriptive boundaries, such as a wire center, census block, or zip code while still maintaining FCC compliance, so long as they provide a rationale for their selection which may depend on the type of support received."⁴

In accordance with Order No. 06-292, Virgin Mobile hereby seeks to amend its previously approved service area by changing the geographic units of measurement used to describe the service area from wire center descriptions to zip code geographic descriptions, for the reasons set forth below.

II. REQUESTED RELIEF

In 2011, the Commission required ETC applicants to describe their requested service area using ILEC wire center descriptions. Changing the geographic unit of measurement to zip codes, used to describe Virgin Mobile's ETC service area, produces a more precise description of its service area. Additionally, other Oregon wireless ETCs who received their designations after Virgin Mobile, used zip codes rather than wire centers to describe their service areas included in their ETC petitions. If Virgin Mobile is permitted to modify its service area to a zip code description (Attached hereto as "Exhibit A"), it will make it easier for Lifeline and OTAP applicants as well as Commission staff to better understand and compare the service footprints of the Lifeline providers in Oregon.

The conversion from wire center to zip code geographic units results in minor adjustments to Virgin Mobile's service area. In Exhibit A, Virgin Mobile excluded zip codes that are assigned to post office boxes as well as zip codes where it has no existing customers and currently has geographic coverage of 35% or less of the zip code territory. The result of this conversion is a slight reduction in the overall service territory represented on the map attached hereto as "Exhibit B".

⁴ *Id.*

III. CONCLUSION

In light of Commission Order No. 15-382 permitting the use of zip codes as geographic units of measurement for ETC designations in Oregon, as well as Order Nos: 15-280 and 15-300 whereby other wireless lifeline providers used zip codes to describe their proposed service areas, Virgin Mobile respectfully requests Commission consent to modify its existing service area description from wire center units of geographic measurement to zip codes.

Dated this 6th day of October, 2017.

Respectfully submitted,

/s/ Kristin L. Jacobson

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Exhibit A

Proposed Final:

Virgin Mobile Service Area OREGON

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97002	Beaverton	Marion
97003	Aurora	Washington
97004	Beavercreek	Clackamas
97005	Beaverton	Washington
97006	Beaverton	Washington
97007	Beaverton	Washington
97008	Beaverton	Washington
97009	Boring	Clackamas
97010	Bridal Veil	Multnomah
97011	Brightwood	Clackamas
97013	Canby	Clackamas
97014	Cascade Locks	Hood River
97015	Clackamas	Clackamas
97016	Clatskanie	Columbia
97017	Colton	Clackamas
97018	Columbia City	Columbia
97019	Corbett	Multnomah
97020	Donald	Marion
97021	Dufur	Wasco
97022	Eagle Creek	Clackamas
97023	Estacada	Clackamas
97024	Fairview	Multnomah
97026	Gervais	Marion
97027	Gladstone	Clackamas
97028	Government Camp	Clackamas
97030	Gresham	Multnomah
97031	Hood River	Hood River
97032	Hubbard	Marion
97034	Lake Oswego	Clackamas
97035	Lake Oswego	Clackamas
97036	Marylhurst	Clackamas
97038	Molalla	Clackamas
97039	Moro	Sherman
97040	Mosier	Wasco
97041	Mount Hood Parkdale	Hood River
97042	Mulino	Clackamas
97044	Odell	Hood River
97045	Oregon City	Clackamas
97048	Rainier	Columbia
97049	Rhododendron	Clackamas
97050	Rufus	Sherman
97051	Saint Helens	Columbia
97053	Warren	Columbia

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97054	Deer Island	Columbia
97055	Sandy	Clackamas
97056	Scappoose	Columbia
97058	The Dalles	Wasco
97060	Troutdale	Multnomah
97062	Tualatin	Washington
97064	Vernonia	Columbia
97065	Wasco	Sherman
97067	Welches	Clackamas
97068	West Linn	Clackamas
97070	Wilsonville	Clackamas
97071	Woodburn	Marion
97075	Beaverton	Washington
97078	Beaverton	Washington
97080	Gresham	Multnomah
97086	Happy Valley	Clackamas
97089	Damascus	Clackamas
97101	Amity	Yamhill
97102	Arch Cape	Clatsop
97103	Astoria	Clatsop
97106	Banks	Washington
97107	Bay City	Tillamook
97108	Beaver	Tillamook
97109	Buxton	Washington
97110	Cannon Beach	Clatsop
97111	Carlton	Yamhill
97112	Cloverdale	Tillamook
97113	Cornelius	Washington
97114	Dayton	Yamhill
97115	Dundee	Yamhill
97116	Forest Grove	Washington
97117	Gales Creek	Washington
97118	Garibaldi	Tillamook
97119	Gaston	Washington
97121	Hammond	Clatsop
97122	Hebo	Tillamook
97123	Hillsboro	Washington
97124	Hillsboro	Washington
97125	Manning	Washington
97127	Lafayette	Yamhill
97128	McMinnville	Yamhill
97130	Manzanita	Tillamook
97131	Nehalem	Tillamook

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97132	Newberg	Yamhill
97133	North Plains	Washington
97134	Oceanside	Tillamook
97135	Pacific City	Tillamook
97136	Rockaway Beach	Tillamook
97137	Saint Paul	Marion
97138	Seaside	Clatsop
97140	Sherwood	Washington
97141	Tillamook	Tillamook
97143	Netarts	Tillamook
97145	Tolovana Park	Clatsop
97146	Warrenton	Clatsop
97147	Wheeler	Tillamook
97148	Yamhill	Yamhill
97149	Neskowin	Tillamook
97201	Portland	Multnomah
97202	Portland	Multnomah
97203	Portland	Multnomah
97204	Portland	Multnomah
97205	Portland	Multnomah
97206	Portland	Multnomah
97208	Portland	Multnomah
97209	Portland	Multnomah
97210	Portland	Multnomah
97211	Portland	Multnomah
97212	Portland	Multnomah
97213	Portland	Multnomah
97214	Portland	Multnomah
97215	Portland	Multnomah
97216	Portland	Multnomah
97217	Portland	Multnomah
97218	Portland	Multnomah
97219	Portland	Multnomah
97220	Portland	Multnomah
97221	Portland	Multnomah
97222	Portland	Clackamas
97223	Portland	Washington
97224	Portland	Washington
97225	Portland	Washington
97227	Portland	Multnomah
97228	Portland	Multnomah
97229	Portland	Washington
97230	Portland	Multnomah

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97231	Portland	Multnomah
97232	Portland	Multnomah
97233	Portland	Multnomah
97236	Portland	Multnomah
97238	Portland	Multnomah
97239	Portland	Multnomah
97240	Portland	Multnomah
97266	Portland	Multnomah
97267	Portland	Clackamas
97301	Salem	Marion
97302	Salem	Marion
97303	Salem	Marion
97304	Salem	Polk
97305	Salem	Marion
97306	Salem	Marion
97310	Salem	Marion
97317	Salem	Marion
97321	Albany	Linn
97322	Albany	Linn
97324	Alsea	Benton
97325	Aumsville	Marion
97327	Brownsville	Linn
97329	Cascadia	Linn
97330	Corvallis	Benton
97331	Corvallis	Benton
97333	Corvallis	Benton
97335	Crabtree	Linn
97336	Crawfordsville	Linn
97338	Dallas	Polk
97341	Depoe Bay	Lincoln
97344	Falls City	Polk
97345	Foster	Linn
97346	Gates	Linn
97347	Grand Ronde	Polk
97348	Halsey	Linn
97350	Idanha	Marion
97351	Independence	Polk
97352	Jefferson	Marion
97355	Lebanon	Linn
97357	Logsdan	Lincoln
97358	Lyons	Linn
97360	Mill City	Marion
97361	Monmouth	Polk

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97362	Mount Angel	Marion
97364	Neotsu	Lincoln
97365	Newport	Lincoln
97366	South Beach	Lincoln
97367	Lincoln City	Lincoln
97368	Otis	Lincoln
97369	Otter Rock	Lincoln
97370	Philomath	Benton
97371	Rickreall	Polk
97373	Saint Benedict	Marion
97374	Scio	Linn
97375	Scotts Mills	Marion
97376	Seal Rock	Lincoln
97377	Shedd	Linn
97378	Sheridan	Yamhill
97380	Siletz	Lincoln
97381	Silverton	Marion
97383	Stayton	Marion
97384	Mehama	Marion
97385	Sublimity	Marion
97386	Sweet Home	Linn
97388	Gleneden Beach	Lincoln
97389	Tangent	Linn
97390	Tidewater	Lincoln
97391	Toledo	Lincoln
97392	Turner	Marion
97394	Waldport	Lincoln
97396	Willamina	Yamhill
97401	Eugene	Lane
97402	Eugene	Lane
97403	Eugene	Lane
97404	Eugene	Lane
97405	Eugene	Lane
97406	Agness	Curry
97408	Eugene	Lane
97409	Alvadore	Lane
97410	Azalea	Douglas
97411	Bandon	Coos
97412	Blachly	Lane
97413	Blue River	Lane
97414	Broadbent	Coos County
97415	Brookings	Curry County
97416	Camas Valley	Douglas County

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97417	Canyonville	Douglas
97419	Cheshire	Lane County
97420	Coos Bay	Coos County
97423	Coquille	Coos
97424	Cottage Grove	Lane
97426	Creswell	Lane
97429	Days Creek	Douglas County
97430	Deadwood	Lane
97431	Dexter	Lane
97432	Dillard	Douglas
97434	Dorena	Lane County
97435	Drain	Douglas County
97437	Elmira	Lane
97438	Fall Creek	Lane
97439	Florence	Lane
97440	Eugene	Lane
97441	Gardiner	Douglas
97442	Glendale	Douglas County
97443	Glide	Douglas County
97444	Gold Beach	Curry
97446	Harrisburg	Linn
97448	Junction City	Lane
97449	Lakeside	Coos
97450	Langlois	Curry
97451	Lorane	Lane
97452	Lowell	Lane
97453	Mapleton	Lane
97454	Marcola	Lane
97455	Pleasant Hill	Lane
97456	Monroe	Benton
97457	Myrtle Creek	Douglas
97458	Myrtle Point	Coos
97459	North Bend	Coos
97461	Noti	Lane
97462	Oakland	Douglas
97464	Ophir	Curry
97465	Port Orford	Curry
97466	Powers	Coos
97467	Reedsport	Douglas
97469	Riddle	Douglas
97470	Roseburg	Douglas
97471	Roseburg	Douglas
97473	Scottsburg	Douglas

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97477	Springfield	Lane
97478	Springfield	Lane
97479	Sutherlin	Douglas
97481	Tenmile	Douglas
97484	Tiller	Douglas
97486	Umpqua	Douglas
97487	Veneta	Lane
97488	Vida	Lane
97490	Walton	Lane
97491	Wedderburn	Curry
97494	Wilbur	Douglas
97495	Winchester	Douglas
97496	Winston	Douglas
97497	Wolf Creek	Josephine
97498	Yachats	Lincoln
97499	Yoncalla	Douglas
97501	Medford	Jackson
97502	Central Point	Jackson
97503	White City	Jackson
97504	Medford	Jackson
97520	Ashland	Jackson
97522	Butte Falls	Jackson
97524	Eagle Point	Jackson
97525	Gold Hill	Jackson
97526	Grants Pass	Josephine
97527	Grants Pass	Josephine
97530	Jacksonville	Jackson
97532	Merlin	Josephine
97533	Murphy	Josephine
97535	Phoenix	Jackson
97536	Prospect	Jackson
97537	Rogue River	Jackson
97538	Selma	Josephine
97539	Shady Cove	Jackson
97540	Talent	Jackson
97541	Trail	Jackson
97543	Wilderville	Josephine
97544	Williams	Josephine
97601	Klamath Falls	Klamath
97603	Klamath Falls	Klamath
97624	Chiloquin	Klamath
97625	Dairy	Klamath
97626	Fort Klamath	Klamath

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97627	Keno	Klamath
97633	Merrill	Klamath
97634	Midland	Klamath
97701	Bend	Deschutes
97702	Bend	Deschutes
97703	Bend	Deschutes
97707	Bend	Deschutes
97730	Camp Sherman	Jefferson
97731	Chemult	Klamath
97733	Crescent	Klamath
97734	Culver	Jefferson
97737	Gilchrist	Klamath
97739	La Pine	Deschutes
97741	Madras	Jefferson
97753	Powell Butte	Crook
97754	Prineville	Crook
97756	Redmond	Deschutes
97759	Sisters	Deschutes
97760	Terrebonne	Jefferson
97801	Pendleton	Umatilla
97810	Adams	Umatilla
97812	Arlington	Gilliam
97813	Athena	Umatilla
97818	Boardman	Morrow
97823	Condon	Gilliam
97824	Cove	Union
97826	Echo	Umatilla
97835	Helix	Umatilla
97836	Heppner	Morrow
97838	Hermiston	Umatilla
97841	Imbler	Union
97844	Irrigon	Morrow
97850	La Grande	Union
97859	Meacham	Umatilla
97861	Mikkalo	Gilliam
97862	Milton Freewater	Umatilla
97868	Pilot Rock	Umatilla
97875	Stanfield	Umatilla
97882	Umatilla	Umatilla
97883	Union	Union
97886	Weston	Umatilla
97903	Brogan	Malheur
97907	Huntington	Baker

PROPOSED FINAL: Virgin Mobile Service Area OREGON

Zip Code	City	County
97913	Nyssa	Malheur
97914	Ontario	Malheur
97918	Vale	Malheur

Exhibit B

Requested Zip Code Service Territory Map

