



August 8, 2019

**VIA ELECTRONIC FILING**

Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Re: In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support, Docket No. 19-GIMT-399-GIT.

Dear Sir or Madam:

Please find a copy of TracFone Wireless, Inc.'s revised Annual Certification of Requirements Imposed by the Commission in Docket No. 06-GIMT-446-GIT. This revision includes updated Lifeline plan details.

Please contact me if you have any questions about this submission. I can be reached at (305) 715-3613, or [sathanson@tracfone.com](mailto:sathanson@tracfone.com)

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Athanson", written in a cursive style.

Stephen Athanson  
Regulatory Counsel

Annual Certification of Requirements Imposed by the  
Commission in Docket Number 06-GIMT-446-GIT  
and by the FCC as Codified in 47 C.F.R. §54.313

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 CFR 4.5(e).

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected
	N/A				

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how you attempted to provide service to those potential customers.

0

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year. 1.17

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION**

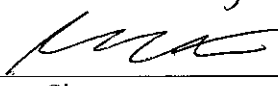
**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is Regulatory Counsel of TracFone Wireless Inc. (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding TracFone Wireless Inc. to the statements made in this certification.

2. By this affidavit, I certify that TracFone Wireless Inc. is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on Aug 8, 2019 (date).

  
\_\_\_\_\_  
Signature

Stephen Athanson  
\_\_\_\_\_  
Printed/Typed Name

5. An ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is Regulatory Counsel of TracFone Wireless Inc. (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding TracFone Wireless Inc. to the statements made in this certification.

2. By this affidavit, I certify that TracFone Wireless Inc. is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on Aug 9, 2019 (date).



Signature

Stephen Athanson

Printed/Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires an ETC to advertise its services throughout the service area for which it has been designated “using media of general distribution.”

Please complete the following:

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
National Cable	Television	Statewide	1/1/2018 and throughout the year

Further, additional marketing material is attached as Attachment 1.

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

**TracFone certifies that it offers a local usage plan “comparable” to those of the incumbent LECs serving relevant service areas. However, TracFone notes that “comparable” does not mean “identical.” There are significant differences between wireline and wireless service offerings. Unlike traditional wireline offerings, TracFone does not offer unlimited local service at flat rates. Instead, its service may be used by customers for all manner of calls – local, long distance, intrastate, and interstate, as well as international calls to more than 60 destinations. There are no separate toll charges and no roaming charges. In addition, TracFone customers receive at no additional charge such vertical service features as call waiting and caller ID. Typically, incumbent wireline LECs charge additional fees for such service features. Given these intrinsic differences between wireline and wireless services, TracFone’s TracFone Wireless service is comparable with that provided by wireline incumbent LECs.**

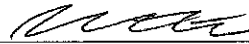
TracFone’s current SafeLink plan includes a choice of 350 minutes of nationwide calling, plus 2GB of mobile data and unlimited text messaging, or 1000 minutes of calling plus 1GB of data and unlimited text messaging. The SafeLink service package is free. In addition TracFone permits eligible Walmart Family Mobile customers to apply their Lifeline support of \$9.25 as a discount on any eligible monthly service plan. A complete list of plans is available at <http://www.myfamilymobile.com>.

**COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is Regulatory Counsel of TracFone Wireless Inc. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding TracFone Wireless Inc. to the statements made in this certification.

2. By this affidavit, I certify that TracFone Wireless Inc. offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on Aug 8, 2019 (date).



Signature

Stephen Athanson

Printed/Typed Name