

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of Application of the Assurance Wireless USA, L.P.)
to Expand Its Eligible Telecommunications Carrier Designated) Docket No. 25-VMBZ-235-ETC
Service Area and to Receive Lifeline Support for Eligible Services)

**APPLICATION OF ASSURANCE WIRELESS USA, L.P.
TO EXPAND ITS ELIGIBLE TELECOMMUNICATIONS SERVICE AREA AND TO
RECEIVE LIFELINE SUPPORT FOR ELIGIBLE SERVICES**

I. INTRODUCTION

Assurance Wireless USA, L.P. (“Assurance Wireless” or “the Company”), a subsidiary of T-Mobile USA, Inc., by its undersigned counsel and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the Act),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (FCC),² and the rules and regulations of the State Corporation Commission of the State of Kansas (“the Commission”), including K.S.A. 66-2008(b), respectfully submits this Application to expand its Eligible Telecommunications Carrier (“ETC”) designated service area for Lifeline only services in the state of Kansas, and to receive subsidies from the Kansas Universal Service Fund for the provision of Lifeline services to eligible customers.

1. On November 2, 2011, in Docket No. 10-VMBZ-657-ETC, the Commission designated Assurance Wireless (formerly Virgin Mobile USA, L.P.)³ as a wireless ETC, pursuant

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ On April 21, 2020, Virgin Mobile USA, L.P. underwent a name change to become Assurance Wireless USA, L.P. Order dated April 21, 2020, in Docket No. 20-VMBZ-411-CCN.

to 47 U.S.C. § 214(e)(2), eligible to receive federal universal service Lifeline support in specified geographic areas.

2. By this Application, Assurance Wireless requests expansion of its designated ETC service area to statewide authority to provide Lifeline only service to additional qualifying Kansas households. Specifically, Assurance Wireless seeks to expand its ETC designated service area to include the wire centers listed in Exhibit 1, which will allow Assurance Wireless to provide Lifeline services to eligible low-income households anywhere it currently has wireless coverage in Kansas. Consistent with its current Lifeline only ETC designation, the Company is not seeking designation in the expanded area to receive high-cost support from the Universal Service Fund.

3. In addition, Assurance Wireless seeks eligibility to receive funding from the Kansas Universal Service Fund (the “KUSF”) for service to eligible low-income consumers throughout the Company’s designated service areas.

4. Assurance Wireless is a wholly owned subsidiary of T-Mobile USA, Inc. (“T-Mobile”). T-Mobile is the third largest wireless carrier in the United States, headquartered in Bellevue, Washington. T-Mobile acquired Assurance Wireless when it completed its acquisition of Sprint Corporation in 2020. The principal offices of Assurance Wireless are located in Bellevue, Washington. Assurance Wireless continues to possess the financial, managerial, and technical capability to provide Lifeline service in compliance with Section 54.201(h) of the FCC’s Rules.

5. Assurance Wireless has been designated as a wireless ETC in the states of Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Kansas, Kentucky, Louisiana, Idaho, Illinois, Indiana, Iowa, Maine,

Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Jersey, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

6. As demonstrated herein, and as certified in the attached Exhibit 2, Assurance Wireless meets all applicable statutory and regulatory requirements for designation as an ETC in the proposed expansion of its designated area. The Commission's grant of Assurance Wireless's Application would advance the public interest by enabling Assurance Wireless to expand the availability of its Lifeline service to substantially more low-income consumers in Kansas. Accordingly, Assurance Wireless respectfully requests that the Commission expeditiously approve this Application.

7. All correspondence, communications, pleadings, notices, orders, and decisions relating to this Application should be addressed to:

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II. DESIGNATED SERVICE AREA

8. In its November, 2011 Order in Docket No. 210-VMBZ-657-ETC, the Commission designated Assurance Wireless as an ETC to provide wireless Lifeline service in the wire centers listed in Exhibit 3. Today, Assurance Wireless, which became part of T-Mobile

in 2020, provides facilities-based wireless service to qualifying low-income subscribers in that area.⁴

9. The existing ETC designation area for Assurance Wireless is materially smaller than its current wireless coverage area in Kansas. Assurance Wireless seeks to expand its ETC service area to provide Lifeline service throughout its existing wireless coverage area, excluding federally-recognized Tribal lands.

III. ASSURANCE WIRELESS MEETS APPLICABLE REQUIREMENTS

10. The FCC's rules and relevant provisions of the Kansas statutes set forth the information that must be contained in an Application for ETC designation. In its original ETC Application, incorporated herein by reference, Assurance Wireless provided all the information required by the FCC's rules in effect at the time, including those set forth in the 2012 Lifeline Reform Order. The Commission found in its Order concerning the original ETC Application that Assurance Wireless met the requirements for designation as an ETC. Assurance Wireless has complied with the conditions in the Order designating it as an ETC and with all subsequent orders relating to ETC status and will continue to do so. Assurance Wireless also complies with the service requirements applicable to the Lifeline support that it receives. Assurance Wireless provides the following additional information to address FCC rules governing the Lifeline program that were amended after the Company's original ETC designation order was issued.

⁴ The FCC has long recognized that entities within a corporate family that enjoy the "beneficial use" of property may consider that property their own for purposes of ETC designation. See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 97-157 at ¶ 158 ("First Report and Order"). The FCC and other states have recognized that Assurance Wireless (f/k/a Virgin Mobile) is a "facilities-based carrier for ETC purposes." See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P., Petitions for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, New Hampshire, and Washington D.C.*, WC Docket No. 09-197, *Order*, DA 10-2433 (rel. Dec. 29, 2010). See, e.g., *In the Matter of the Petition of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier*, Docket No. P-6863/M-11-314, *Order Granting Limited ETC Designation* (rel. Dec. 7, 2012) at 3 ("Virgin Mobile has not requested forbearance from the facilities ownership requirement because it was acquired by Sprint Nextel and therefore has the benefit of Sprint's wireless facilities.").

A. Assurance Wireless Will Provide All Required Services in The Expanded Designated Service Area

11. Assurance Wireless will provide all services required by Section 54.101(a) of the FCC's Rules throughout its expanded designated service area in the State of Kansas, including voice and broadband Internet access services. Assurance Wireless commits that its Lifeline services will meet or exceed the required minimum service standards, including any future changes. The Company's current Lifeline offering, which is also offered in its existing ETC designated service area, is attached as Exhibit 4; the Terms and Conditions are available on its website.

B. Assurance Wireless's Processes Comply with the Lifeline Verification and Enrollment Requirements, and the Company Remains Committed to Preventing Waste, Fraud and Abuse of the Lifeline Program

12. Section 54.410 of the FCC's rules and the Commission's rules require ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Assurance Wireless has processes in place to facilitate compliance with federal customer enrollment requirements. Specifically, the Company relies on the National Verifier and the National Lifeline Accountability Database (NLAD), each of which is administered by the Universal Service Administrative Company (USAC), to determine an applicant's eligibility for Lifeline service. Every applicant is required to complete the standardized Lifeline application in the National Verifier environment, which covers the necessary information collection, disclosures, and certifications required by Section 54.410(d) of the Lifeline rules. For applicants verified as being eligible by USAC's National Verifier and NLAD, Assurance Wireless completes enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. Assurance Wireless also: (1) informs customers of the need to use the service at least once every thirty (30) days as required by Section 54.407(c)(2); (2) provides notice to

customers after thirty (30) days of non-usage that they must use the service within fifteen (15) days or their service will be terminated as required by Section 54.405(e)(3); and (3) requires customers to activate their Lifeline service as required by Section 54.407(c)(1).

13. Assurance Wireless has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with FCC rules designed to achieve that objective, including customer usage, cure period, and de-enrollment requirements set forth in Sections 54.407(c)(2) and 54.405(e)(3), general notice and de-enrollment requirements set forth in Section 54.405(e)(1), transmission of information to NLAD and recordkeeping requirements set forth in Sections 54.404(b)(6) and 54.417, annual certification and reporting requirements set forth in Sections 54.416 and 54.420, and reimbursement claims processes established by USAC consistent with Sections 54.403 and 54.407(a).

14. Assurance Wireless also complies with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and coordinates with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.⁵ If Assurance Wireless receives a request for de-enrollment from a subscriber, it processes the request within two (2) business days in accordance with Section 54.405(e)(5).

15. Assurance Wireless has direct contact with all applicants for its Lifeline service, either in person through its employees, agents, or representatives, or via SMS messaging, the telephone, mail, or online. In addition, in accordance with Section 54.406 of the FCC's rules, Assurance Wireless's enrollment representatives are required to register in USAC's Representative Accountability Database.

⁵ 47 C.F.R. §§ 54.405(e), 54.410(f).

16. Finally, Assurance Wireless provides or requires Lifeline-specific training for all personnel, whether employees, direct contractors, or representatives, who interact with new or prospective customers regarding the FCC's Lifeline eligibility and certification rules and the Company's practices and policies designed to implement those rules. Assurance Wireless has a zero-tolerance policy for waste, fraud, and abuse, and personnel are instructed to notify the Company's compliance team if they suspect that anyone might be providing false information or attempting to obtain a duplicate Lifeline benefit.

IV. EXPANSION OF ASSURANCE WIRELESS'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

17. In its Order designating Assurance Wireless as an ETC, the Commission found that designation of Assurance Wireless as an ETC would serve the public interest. Similarly, expansion of Assurance Wireless's ETC service area to include all additional areas where it has wireless coverage will serve the public interest by providing a variety of benefits to more Lifeline-eligible consumers including increased consumer choice, high-quality service offerings, and mobility. The designated ETC area expansion will increase the number of low-income households that can benefit from Assurance Wireless's high quality mobile voice, text, and data services. Indeed, its presence in the expanded designated area will increase communications within the Lifeline market, which this Commission and the FCC have previously indicated is in the public interest. For the foregoing reasons, grant of this Application is in the public interest.

V. A DECLARATION THAT ASSURANCE WIRELESS IS ELIGIBLE TO RECEIVE LIFELINE SERVICE SUBSIDIES IS IN THE PUBLIC INTEREST

18. As noted above, Assurance Wireless is also applying to receive KUSF subsidies for its provision of Lifeline-supported services to its customers in the areas in which it has, and will be, declared to be an ETC. Under K.S.A. 66-2009(b), wireless carriers that have been

declared by the Commission to be ETCs are eligible for Lifeline benefits from the KUSF. Several wireless carriers have been so designated by the Commission, so Assurance Wireless is not seeking a benefit that has been denied to all other similarly-situated carriers.

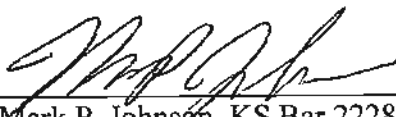
19. Assurance Wireless commits to continue the provision of all services required for participation in the Kansas Lifeline Service Program. The scope of the services to which Assurance Wireless commits to continue provide is set forth in attached Exhibit 4.

20. All low-income customers in the Assurance Wireless ETC service area will benefit from the presence of an additional KLSP-participating carrier, even if they personally do not subscribe to Assurance Wireless service. Additional competition in the KLSP market benefits all potential customers for that service.

V. CONCLUSION

21. Based on the foregoing, Assurance Wireless respectfully requests that the Commission promptly grant this Application and expand its Lifeline-only ETC service area to include the additional wire centers described in this Application and grant Assurance Wireless access to KUSF subsidies, as authorized by Kansas statutes.

Respectfully submitted this 6th day of December 2024.



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ATTORNEYS FOR ASSURANCE WIRELESS USA, L.P.

EXHIBIT 1

<u>Locality</u>	<u>Wire center</u>
SRPUBLCNCY	RPCYNEXG
JETMORE	JTMRKSXA
LEOTI	LEOTKSXA
SHARON SPG	SHSPKSXA
TRIBUNE	TRBNKSXA
COUNCILGRV	CNGVKSXA
CONCORDIA	GLELKSXA
ELKHART	EKHTKSXA
STAFFORD	MCVLKSXA
LEWIS	RSCTKSXA
ST JOHN	STJHKSXA
MAYETTA	WTMRKSXA
ALBERT	ALBRKSXA
GARFIELD	GRFDKSXA
ROZEL	ROZLKSXA
GORHAM	GRHMKSXA
BUSHTON	BSTNKSXA
DORRANCE	DRNCKSXA
HOLYROOD	HLYRKSXA
LA HARPE	LHRPKSXA
LITTLE RIV	LTRVKSXA
HOISINGTON	VCTAKSXA
ULYSSES	ULYSKSXA
GALATIA	GALAKSXA
OLMITZ	OLMTKSXA
KANORADO	BRWSKSAB
LEVANT	BRWSKSXA
DIGHTON	DGTNKSXA
HAZELTON	MDLDKSAJ
ALMENA	ALMEKSMA
ANTHONY	ANTHKSWS
HERNDON	ATWDKSST
BUCKLIN	BCKLKSSM
BELOIT	BELTKS02
BIRD CITY	BRCYKSRE
CANEY	CANYKS05
CEDAR VALE	CDVAKSPL
COLDWATER	CDWRKSLU
COFFEYVL	CFVLKS10
DEARING	CFVLKSDE
CHASE	CHASKSWE

CHERRYVALE	CHVAKSEM
COLBY	CLBYKS05
CLAYCENTER	CLCTKS06
DODGE CITY	DDCYKS01
ELLSWORTH	ELWOKSNO
FLORENCE	FLRNKSTR
FRANKFORT	FRFTKSLO
FOWLER	FWLRKSMI
GOODLAND	GDLDKSAB
GARDENCITY	GRCYKS07
GREAT BEND	GRTBKSST
HAYS	HAYSKS11
HOLCOMB	HLCMK SMA
HAMILTON	HMTNKS01
HERINGTON	HNTNKSNA
HANOVRRHNBG	HNVRKSED
HOXIE	HOXIKSTR
HARPER	HRPRK SMA
HOWARD	HWRDKSWA
INDEPNDNCE	INDPK SMA
JEWELL	JEWLKSHA
LA CROSSE	LACRKSEL
LIBERAL	LBRLKS04
LINCOLN	LNCLKSLI
LARNED	LRNDK SBR
LYONS	LYNSKSEA
MARION	MARNKSLA
MCDONALD	MCDDKSKE
MEDICNLODG	MDLDKS01
MEADE	MEADKSSL
MANKATO	MNKTKSCO
MINNEOLA	MNNLKSTU
MOLINE	MOLNKSMI
MARYSVILLE	MYVIKSEL
NEODESHA	NDSHKS04
NORCATUR	NRTNKSLI
OBERLIN	OBRLKSHA
OAKLEY	OKLYKS03
PEABODY	PBDYKSWA
PHILLIPSBG	PHBGKS04
PLAINS	PLNSKSLO
PLAINVILLE	PLVLKSMI
PROTECTION	PRTCK SMA
PAWNEEROCK	PWRKKS YU
SUBLETTE	SBLTKSOR

SABETHA	SBTHKSVI
SCOTT CITY	SCCYKSMA
SEDAN	SEDNKSCH
SENECA	SENCKSDE
STOCKTON	SKTNKSAS
SMITH CTR	SMCTKSMA
ST FRANCIS	STFNKSWA
STAFFORD	STFRKSBO
SEVERY	SVRYKSRE
WASHINGTON	WASHKS03
BLRP-WTVL	WTVLKSST
YATES CTR	YTCTKSST
SALINA	TPKAKSJA
LIBERTY	LBRTKSXA
TYRO	TYROKSXA
DUNLAP	LNVLKSXA
HAVILAND	DDCYKSAT
ABBYVLPLVN	ABVLKSXA
ALDEN	ALDNKSXA
ALTOONA	ALNAKSXA
BELPRE	BLPRKSXA
BENEDICT	BNDCKSXA
CLAFLIN	CLFLKSXA
COYVILLE	CYVLKSXA
DURHAM	DRHMKSXA
EFFINGHAM	EFHMKSXA
FALL RIVER	FLRVKSXA
GRIDLEY	GRDLKSXA
GREELEY	GRELKSXA
HUDSON	HDSNKSXA
HOISINGTON	HSTNKSXB
LEROY	LERYKSXA
LAFONTAINE	LFNTKSXA
LEHIGH	LHGHKSXA
LANGDON	LNGDKSXA
PARKER	PRKRKSXA
PARTRIDGE	PRRGKSXA
QUINCY	QNCYKSXA
STERLING	STNGKSXA
SYLVIA	SYLVKSXA
TORONTO	TOROKSXA
BURLINGTON	BURLKSXA
ELLINWOOD	ELLNKSXA
FREDONIA	FRDNKSXA
GARNETT	GRNTKSXA

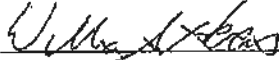
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HILLSBORO	HLBOKSXA
HORTON	HRTNKSXA
HIAWATHA	HWTHKSXA
POWHATTAN	PWHTKSXA
WESTPHALIA	WPHLKSXA
CASSODAY	CSSDKS04
UDALL	UDLLKS03

EXHIBIT 2

VERIFICATION

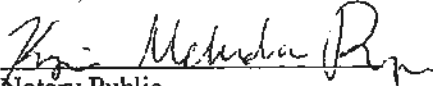
I, William A. Haas, state that I am the Managing Corporate Counsel Government Affairs – State Regulatory, T-Mobile, and that I am authorized to make this Verification on behalf of Assurance Wireless USA, L.P. I have reviewed the facts set forth in the foregoing Application and verify that facts relating to Assurance Wireless USA, L.P. are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at any hearing held in this matter. I further certify that Assurance Wireless USA, L.P. will comply with the service requirements applicable to the low-income universal service support it receives.

Dated: December 16, 2024



William A. Haas
Managing Corporate Counsel
Government Affairs – State Regulatory
T-Mobile
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630-290-7615

Signed before me this 16 day of December, 2024.



Notary Public

My commission expires:



EXHIBIT 3

WIRE CENTERS SERVED

HOMEKSXA
AMRCKSXA
EVRSKSXA
HTSNKS02
MNHTKSFA
CLNYKSXA
ARMAKSXA
GRRDKSXA
GLBGKSXA
CLMBKSXB
PLTNKSXA
UNTWKSXA
GLELKSXA
BXSPKSXA
GALNKSXA
RVTNKSXA
SCMNKSXA
HVLDKSXA
LEWSKSXA
CNSPKSXA
ASSRKSXA
GALVKSXA
AGNDKSXA
CUBAKSXA
HNVLKSXA
SLDRKSXA
CLWLKSXA
LHRPKSXA
MDSNKSXA
HLDLKSXA
LSBGKSXA
RNTLKSXA
GSSLKSXA
MNRGKSXA
LACYKSXA
ALLNKSXA
SCTNKSXA
CLWRKSXA
BRDNKSXA
ABLNKSCD
ENTRKST
ANDLKSHI
ARCYKSSO
ATSNKSSF
BLDWKSXA
BHLRKSXA
BRLNKSXA
BRRTKSXA
ESRGKSXA

KSCYKSNB
BLVLKSMS
WCHTKSBE
KSCYKSBS
BRNSKSPA
CNTNKSSM
CHNTKSSS
CPMNKS04
CHNYKSKI
CHTPKSBE
CNCRKSBR
CTFLKSBR
DESTKSLU
DGLSKSPI
FTSCKS01
PSBGKSLO
ELDOKSST
EMPRKS08
ERIEKSCI
EUDRKSKI
EURKKSEL
GRDPKSLE
WCHTKSGM
GNBGKSFL
GYPSKSOW
HLSTKSTE
HRFRKSA
HMBLKSBR
IOLAKSSY
KSCYKS10
KSCYKSCB
KSCYKSJO
KSCYKSLE
KSCYKSNA
KSCYKSPA
KSCYKSSH
KSCYKSST
KGMNKSMA
KNSLKSNI
LWRNKSVE
LVWOKSLN
LVWOKSSH
TPKAKSLE
LEONKSPI
LNBGKSLI
MRQTKSKI
MCSNKSAS
MPTNKSXA
MYTTKSXA

MPLSKS02
MTHPKS04
NWTNKS05
NCSNKSHA
TPKAKSNO
KSCYKSOL
OTWAKSMA
PAOLKSPE
PRSSKSWA
PRTTKSNI
SALNKSTA
SCNDKSFE
WCHTKSCZ
SLMNKSOL
TPKAKSCA
STPLKSHI
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TWNDKSJE
WGTNKSNF
TPKAKSFA
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WCHTKSAG
WCHTKSAH
WCHTKSAM
WCHTKSAN
WCHTKSCB
WCHTKSCE
WCHTKSDE
WCHTKSKE
WCHTKSML
WCHTKSNW
WCHTKSOL
WCHTKSRH
WCHTKSTE
WCHTKSVC
WLBGKSMA
WNFDKSMI
ELGNKSXA
BGTNKSXA
TSCTKSXA
MLVAKSXA
RILYKSXA
HOPEKSXA
ALMAKSXA
ALMTKSXA

HVENKSXA
HLTNKSXA
JNCYKSXA
JNCYKSXB
KNCDKSXA
LYNDKSXA
MLVRKSXA
MORNKSXA
MORLKSXA
MNVYKSXA
OSWTKSXA
OSKLSXA
OSWGKSXA
POMNKSXA
QUNMKSXA
TROYKSXA
VLFLKSXA
WTHNKSXA
WVRLKSXA
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EGTNKSXA
EMMTKSXA
FNTAKSXA
GRNRKSXA
HVVLKSXA
HETNKSXA
HOYTKSXA
INMNKSXA
LNCSKSXA
LANEKSXA
LEBOKSXA
LNWDKSXA

MCLTKSXA
MRDNKSXA
MCVYKSXA
MDCYKSXA
MRDCKSXA
NSFLKSXA
NRVLKSXA
OSCYKSXA
OVBKKSXA
OXFRKSXA
OZWKKSXA
PRRYKSXA
PIQUKSXA
PSTNKSXA
PRPRKSXA
PRTNKSXA
RCMDKSXA
ROVLKSXA
SLLKKSXA
SPHLKSXA
STMYKSXA
THYRKSXA
WLTNKSXA
WLVLSXA
WNCHKSA
WNDMKSXA
PAXCKSA
STGRKSXA
WAMGKSXA
CSSDKSA
MTGRKSXA
OLPEKSA
PTWNKSA
ROCKKSA
UDLLKSA
WLSNKSA
ZENDKSA

EXHIBIT 4

Basic Lifeline: unlimited text messaging, 3,000 domestic voice minutes and 4.5 gigabytes of data provided at no charge to the subscriber.

Data Peace of Mind Annual: unlimited texts, 3,000 domestic voice minutes, and 7 gigabytes of data for \$10/annually.

Data Peace of Mind Monthly: unlimited texts, 3,000 domestic voice minutes, and 7 gigabytes of high-speed data per month for \$0.83/month.