



June 30, 2018

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. 18-GIMT-394-GIT.

Dear Sir or Madam:

Please find a copy of TracFone Wireless, Inc.'s Annual Certification of Requirements Imposed by the Commission in Docket No. 06-GIMT-446-GIT.

We understand the Commission no longer requires a copy of the FCC Form 481 to be filed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Athanson", written over a horizontal line.

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

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

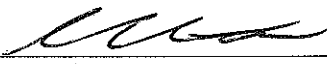
5. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

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 June 30, 2018 (date).



Signature

Stephen Athanson

Printed/Typed Name

6. 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 June 30, 2018 (date).



Signature

Stephen Athanson

Printed/Typed Name

7. 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	1/1/2017 and throughout the year

Further, additional marketing material is attached as Attachment 1.

8. 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.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

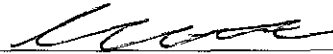
KCC Docket Reference: 06-GIMT-446-GIT

(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 June 30, 2018 (date).



Signature

Stephen Athanson

Printed/Typed Name

Attachment 1

SafeLink[®] WIRELESS



Call 1-800-SafeLink
or visit SafeLinkWireless.com

SafeLink Wireless is a Lifeline supported service, a government benefit program. Only eligible consumers may enroll in Lifeline. Lifeline service is non-transferable and limited to one per household. Documentation of income or program participation may be required for enrollment. SafeLink is provided by TracFone Wireless Inc. SafeLink Keep Your Own Smartphone plan requires a compatible GSM phone. Most Smartphones are compatible. To enable your current phone to work with the SafeLink service we will send you a new SIM Card. Offers may vary by state and may not be available in all service areas. SafeLink Keep Your Own Smartphone and services are subject to the terms and conditions of service found at SafeLink.com. In the event of a conflict, the terms and conditions of service available at SafeLink.com shall apply.

We are

What we offer Free Cellphone Service



Love Your Phone? Keep It!*

Free Every Month:

- 350 Monthly Minutes & Unlimited Texts
- 1.5GB/month of Free Data for the first 3 Months of Service, 1GB/month thereafter**

OR



Receive a Free Phone

Free Every Month:

- 350 Monthly Minutes & Unlimited Texts
- 1GB/month of Free Data**

*You must have a compatible GSM phone. Most Smartphones are compatible.
**Unused data will not Carryover from month-to-month. A month equals 30 days.

Your Link to



Employment



Family



Emergency Services

Who we are

SafeLink Wireless is a LifeLine-supported service for income eligible households. It is more than a free smartphone and more than free wireless service. We believe that cellphone ownership and connectivity are important tools important tools for individual progression and self-sufficiency.



25 million
customers served
since 2008



TracFone is the **#1**
prepaid wireless
provider in the U.S.



Federal
benefits
program

Who is eligible

Applicants who participate in programs such as Medicaid, or Supplemental Nutrition Assistance Program (Food Stamps/SNAP) or whose income levels fall below their state of residency's poverty guidelines are eligible for SafeLink service.



Medicaid



Supplemental
Nutrition
Assistance
Program

On the nation's largest
and most dependable
4G LTE[†] (high speed) networks



☐ States where
SafeLink is available

Please visit SafeLinkWireless.com
to see when new states are added

[†]To get 4G LTE speed, you must have a 4G LTE capable device and 4G LTE SIM.
Actual availability, coverage and speed may vary. LTE is a trademark of ETSI.