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VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

Re: Docket No. 2009-144-C
Application of TracFone Wireless, Inc.
For Designation as an Eligible Telecommunications
Carrier in the State of South Carolina for the Limited
Purpose of Offering Lifeline Service to Qualified Households

Dear Mr. Terreni:

Transmitted herewith on behalf of TracFone Wireless, Inc. (TracFone) and SafeLink Wireless, Inc. (SafeLink Wireless) is the verified testimony of F. J. Pollak, President and Chief Executive Officer of TracFone and President of SafeLink Wireless. By this letter and accompanying testimony, it is requested that the Commission approve the assignment of TracFone's above-captioned application for designation as an eligible telecommunications carrier ("ETC") to SafeLink Wireless, and that it approve the application of SafeLink Wireless for designation as an ETC for the limited purpose of providing Lifeline service to low-income South Carolina households.

As described in Mr. Pollak's testimony, TracFone has worked with the Office of Regulatory Staff ("ORS") to resolve the contested issue of whether TracFone, if designated an ETC, must contribute to the South Carolina Universal Service Fund ("State USF"). SafeLink Wireless is a wholly-owned subsidiary of TracFone. It is incorporated under the laws of the State of Delaware and has registered with the South Carolina Secretary of State to transact business in South Carolina as a foreign corporation. Unlike TracFone, SafeLink Wireless will not provide wireless telecommunications service to the general population of South Carolina. It will operate only as an ETC and will provide Lifeline service to qualified low-income South Carolina households. As a wireless carrier and an ETC, SafeLink Wireless will be required to contribute to the State USF on revenues which it earns from South Carolina customers. TracFone, which is not an ETC, will not be required to contribute to the State USF. In South Carolina, wireless carriers are not required to contribute to the State USF unless they are ETCs or Carriers of Last Resort.

SafeLink Wireless will provide qualified low-income South Carolina households with SafeLink Wireless® service as initially described in the TracFone ETC application. However, there will be several modifications to its service offering as a result of discussions between TracFone and ORS. First, in addition to receiving free wireless handsets and 65 minutes per month of wireless airtime, SafeLink Wireless customers will be able to purchase additional airtime at a rate of $0.10 per minute, rather than the $0.20 rate initially proposed by TracFone. Second, SafeLink Wireless will provide a quarterly report to the Commission and to ORS. The information to be contained in those quarterly reports is described in Mr. Pollak's testimony. Third, one year following the approval of SafeLink Wireless's ETC application, representatives of the company and ORS will meet to review the Lifeline program.

In all other respects, the Lifeline offering of SafeLink Wireless will be identical to that proposed by TracFone. Further, since TracFone's proposal and its qualifications for designation as an ETC already have been subject to a hearing in this proceeding, it is respectfully requested that the Commission approve the assignment of the pending ETC application to SafeLink Wireless, and that the Commission approve the ETC application without conducting another hearing.

If there are questions regarding the proposal set forth in this letter or regarding Mr. Pollak's verified testimony, please communicate directly with undersigned counsel for TracFone and for SafeLink Wireless.

Sincerely,

Mitchell F. Brecher

Cc: Mr. Dukes Scott
Ms. Nanette Edwards

Enclosure