

CLAIM OF CONFIDENTIALITY
 NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
 FILED BY OPC

**FLORIDIAN
 PARTNERS,
 LLC**

FOR DN 07569-10, WHICH
 IS IN LOCKED STORAGE. YOU MUST BE
 AUTHORIZED TO VIEW THIS DN. - CLK

September 7, 2010

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100000-OT

BY HAND DELIVERY

Ms. Ann Cole, Director
 Commission Clerk and Administrative Services
 Room 110, Easley Building
 Florida Public Service Commission
 2540 Shumard Oak Blvd.
 Tallahassee, Florida 32399-0850

Dear Ms. Cole:

TracFone Wireless, Inc. d/b/a Safelink Wireless (Safelink) pursuant to Section 364.183(1), Florida Statutes and Rule 25-22.006(5), Florida Administrative Code, hereby claims that the enclosed Responses to Staff's August 2nd, 2010 2010 Lifeline Report Data Request, contain certain specific, confidential and proprietary customer and business information that should be held exempt from public disclosure.

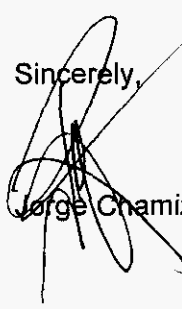
The following Responses contain the claimed confidential and proprietary customer and business information:

<u>Question</u>	<u>Description of Confidential Information Provided</u>
2.	Total Number of Safelink Customers Enrolled Per Month
4.	Total Number of Safelink Customers Added on a Monthly Basis
11.	Total number of Income-Based Safelink Customers Added Per Month
12.	Total number of Program-Based Safelink Customers Added Per Month
20	Attachments C & D: Proprietary Lifeline Program Enrollment & Verification Processes
21	Attachment E: Safelink Lifeline Training Guide

Please acknowledge receipt of this letter by stamping the extra copy "filed" and returning the same to me.

Thank you for your assistance with this filing.

COM _____
 APA _____
 ECR 2
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 ADM _____
 OPC _____
 CLK _____
 CORPORATE & PUBLIC AFFAIRS

Sincerely,

 Jorge Chamizo, Esq.

DOCUMENT NUMBER DATE
 07568 SEP-9 2
 FPSC-COMMISSION CLERK

REDACTED

TRACFONE WIRELESS, INC.

- 1. The Number of residential access lines in service each month.

TracFone is a reseller of networks and does have residential access lines.

- 2. The number of Lifeline customers participating each month? (Do not include customers receiving Lifeline through the Transitional Lifeline Provision or resold access lines)

FL Subscribers (2009-2010)			
Jul-09	[REDACTED]	Jan-10	[REDACTED]
Aug-09	[REDACTED]	Feb-10	[REDACTED]
Sep-09	[REDACTED]	Mar-10	[REDACTED]
Oct-09	[REDACTED]	Apr-10	[REDACTED]
Nov-09	[REDACTED]	May-10	[REDACTED]
Dec-09	[REDACTED]	Jun-10	[REDACTED]

- 3. The number of customers participating in Link-Up each month. Note: Do not include customers receiving Link-Up through resold access lines.

Not applicable; TracFone Wireless did not seek Link-Up support from the Florida Public Service Commission.

- 4. The number of customers denied Lifeline service. Identify the reasons(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed.)

Denial/Rejection Reason	Count of Enrollment Number	Percentage (%)
address invalid	[REDACTED]	0.45%
BO - altered application	[REDACTED]	0.31%
BO - application not clear	[REDACTED]	0.51%
BO - Application not legible	[REDACTED]	0.09%
BO - Application not received	[REDACTED]	0.29%
BO - Cancellation requested on form	[REDACTED]	0.04%
BO - Disclosure modified or not accepted	[REDACTED]	0.39%
BO - general reasons related to a note on form or unauthorized change	[REDACTED]	0.22%
BO - income proof related	[REDACTED]	0.11%
BO - invalid or missing income option on form	[REDACTED]	0.47%
BO - Invalid unit number on address	[REDACTED]	0.31%
BO - invalid, unclear or missing SSN/DOB	[REDACTED]	2.11%
BO - missing multiple fields	[REDACTED]	0.24%
BO - missing part of application form	[REDACTED]	0.82%
BO - missing program selection	[REDACTED]	0.89%
BO - missing proof of income level	[REDACTED]	0.20%

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FPSC-COMMISSION OF PUBLIC UTILITIES

BO - OPC income question not answered	129	0.43%
BO - Printed Name not provided	115	0.38%
BO - proof under a different name	3	0.01%
BO - Signature related issues (missing or invalid)	647	2.15%
BO - Underage Applicant	57	0.19%
customer request	52	0.17%
Customer request - to reapply online	33	0.11%
DCF - online verification rejection	4,344	14.41%
Duplicated attempt	866	2.87%
invalid address	1,157	3.84%
Lexis Nexis Rejection	5,632	18.69%
One per Household	12,870	42.70%
OPC - customer request	5	0.02%
OPC rejection	1,912	6.34%
POBOX	76	0.25%
Grand Total	30,139	100.00%

5. The number of Lifeline customers added each month? (Do not included customers receiving Lifeline through the Transitional Lifeline provision or resold access lines

Jul-09	26,431	Jan-10	15,670
Aug-09	27,953	Feb-10	11,931
Sep-09	23,672	Mar-10	11,242
Oct-09	23,251	Apr-10	11,805
Nov-09	20,174	May-10	9,357
Dec-09	18,221	Jun-10	13,088

6. The number of Link-Up customers added each month. Note: Do not include customers receiving Link-Up through resold access lines.

Not applicable; TracFone Wireless did not seek Link-Up support from the Florida Public Service Commission.

7. The number of Lifeline customers removed each month? (Exclude LL customers removed from resold access lines)

Jul-09	58,719	Jan-10	26,816
Aug-09	71,039	Feb-10	21,648
Sep-09	70,701	Mar-10	22,007
Oct-09	26,186	Apr-10	24,687
Nov-09	24,730	May-10	21,920

Dec-09	29,661	Jun-10	20,876
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8. The number of Lifeline customer subscribing to bundled service packages each month. Please list each bundled package separately including the ancillary services contained in each.

Not applicable

9. The number of customer participating in Transitional Lifeline each month.

FL Subscribers in transitional lines (2009-2010)			
Jul-09	18,384	Jan-10	65,513
Aug-09	23,438	Feb-10	72,729
Sep-09	15,635	Mar-10	68,053
Oct-09	32,465	Apr-10	66,918
Nov-09	50,598	May-10	66,986
Dec-09	59,891	Jun-10	47,845

10. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Not Applicable; TracFone Wireless does not participate in Lifeline under the Tribal Lands provision.

11. The number of Lifeline customers added each month through the income-based enrollment process?

FL Subscribers Added Income-Based (2009-2010)			
Jul-09	████	Jan-10	████
Aug-09	████	Feb-10	████
Sep-09	████	Mar-10	████
Oct-09	████	Apr-10	████
Nov-09	████	May-10	████
Dec-09	████	Jun-10	████

12. The number of Lifeline customers added each month through the program-based enrollment process?

FL Subscribers Added Program-Based (2009-2010)			
Jul-09	████	Jan-10	████
Aug-09	████	Feb-10	████
Sep-09	████	Mar-10	████
Oct-09	████	Apr-10	████
Nov-09	████	May-10	████
Dec-09	████	Jun-10	████

13. The number of Lifeline customers added each month through the FL PSC's online enrollment process?

FL Subscribers Added PSC Enrollment (2009-2010)			
Jul-09	173	Jan-10	195
Aug-09	272	Feb-10	125
Sep-09	129	Mar-10	120
Oct-09	105	Apr-10	130
Nov-09	244	May-10	89
Dec-09	158	Jun-10	99

14. The number of Lifeline customers added each month through the Dept of Children and Families (DCF) automatic enrollment process?

FL Subscribers Added through DCF (2009-2010)			
Jul-09	-	Jan-10	-
Aug-09	-	Feb-10	-
Sep-09	-	Mar-10	-
Oct-09	-	Apr-10	2,404
Nov-09	-	May-10	5,614
Dec-09	-	Jun-10	7,954

15. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

Not Applicable.

16. Company's procedures for enrolling customers in the Lifeline program. Please include the following in your response:

- A Procedures used to process applications received from the OPC
Same as 2009
- B Procedures used to process applications received directly from customers
Same as 2009
- C Procedures used to process applications received through the PSC online process
Same as 2009
- D Procedures used to process applications received through the DCF automatic enrollment process.

TracFone Wireless does not currently have an automatic enrollment process with the DCF (Department of Children and Family). Instead TracFone Wireless has implemented a process to validate applicant's eligibility when an applicant selects a DCF program (Medicaid, Food Stamps, and Temporary Assistance for Needy Families (TANF)), the applicant's eligibility is verified by validating the applicant's participation in the specified program through DCF's data base.

- E The amount of time required to process applications. (include time period between receipt of customer application and the billing date of the first bill providing the credit)
Same as 2009

17. Company's procedures for performing continued verification of subscriber eligibility after initial certification. Please include the following in your response:

- A Time period between initial certification and verification
Same as 2009
- B If allowed, the statistical sampling method(s) used to verify customer eligibility
Same as 2009
- C Frequency of periodic verification
Same as 2009

18. Description of each bundled service offering available to Link-Up and Lifeline customers (if same as 2009 response, just note "Same as 2009"). Include the following in your response:

- a. Applicable recurring and nonrecurring charges
Same as 2009
- b. Any policy for allowing payment of local usage component of bundled service offering by Lifeline customers to avoid disconnection
Same as 2009
- c. Any terms and conditions applicable to Lifeline customers that would not apply to general service offering customers
Please see Attachment A for copy of TracFone Wireless' Lifeline Terms & Conditions.

19. Company's procedures for promoting Lifeline. Please include the following in your response:

- a. Internal procedures for promoting Lifeline
Same as 2009
- b. Outreach and educational efforts involving participation in community events
Same as 2009
- c. Outreach and educational efforts involving mass media (newspaper, radio, TV)
Same as 2009
- d. Copies of Lifeline outreach materials of our company
In 2009, TracFone Wireless introduced social services. Please see Attachment B.
- e. Organizations TracFone is currently partnering with, have partnered with and organizations TracFone plans to partner with to educate and inform customers about Lifeline?
TracFone is currently partnering with the following organizations; Community Action Partnership, United Way of Miami-Dade, Goodwill Industries, and Feeding America.

20. Description of procedures associated with enrollment of Link-Up and Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:

- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.
Not Applicable

b. Certification and verification procedures and requirements.

Please see **Attachment C** and **Attachment D**

c. Any other terms and conditions applicable to resellers offering Link-Up and Lifeline that are not imposed on resellers who do not offer Link-Up and Lifeline.

Not Applicable

21. Please describe the training you provide to your customer service representatives regarding Link-Up and Lifeline and provide the script used by your company's representatives.

Please see **Attachment E** for enclosed customer service representative Lifeline program training document.

22. Please describe the circumstances in which customer service representatives advise customers that Lifeline and Link-Up is available.

Not applicable; TracFone Wireless advertises in various channels

23. Please provide any link on your Web site that provides Lifeline information.

www.safelink.com

24. Does your company provide Lifeline services using its own facilities? If so, describe the facilities in detail and provide the number of customers provided Lifeline service through these facilities each month.

Not Applicable; TracFone Wireless does not own, manage or operate any facilities.

25. Does your company provide Lifeline services using unbundled network elements leased from an ILEC? If so, identify the ILECs, and the number of UNE lines leased each month from each.

Not Applicable

26. Does your company provide Lifeline services using resale Lifeline/Link-Up lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

Not Applicable

27. Does your company receive reimbursement for Toll-Limitation Services (TLS)? If so from who? List a breakdown of incremental costs claimed for providing TLS.

Not Applicable

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

Jorge Chamizo
108 S. Monroe Street
Suite 200
Tallahassee FL 32301

Re: Acknowledgement of Confidential Filing in Docket No. 100000-OT

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on September 9, 2010, in the above-referenced docket.

Document Number 07569-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.