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IDAHO PUBLIC
UTILITIES COMMISSION

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February 26, 2010

VIA OVERNIGHT DELIVERY

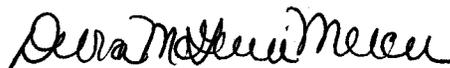
Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, Idaho 83702

Re: In the Matter of the Application of TracFone Wireless Inc. for Designation as an Eligible Telecommunications Carrier, Case No. TFW-T-09-01

Dear Ms. Jewell:

Enclosed please find an original and seven (7) copies of a Petition for Reconsideration and a First Amended Application of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier. An additional copy of each document is included to be date-stamped and returned in the enclosed envelope. Please contact me if you have any questions about this submission.

Sincerely,



Debra McGuire Mercer

Counsel for TracFone Wireless, Inc.

Enclosures

cc: Grace Seaman

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF TRACFONE WIRELESS, INC. FOR) CASE NO. TFW-T-09-01
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER) PETITION FOR RECONSIDERATION OF
) APPLICANT TRACFONE WIRELESS,
) INC.

TracFone Wireless, Inc. (“TracFone”), pursuant to Idaho Code, § 61-626 and IDAPA 31.01.01.331, files this Petition for Reconsideration in which it respectfully asks the Idaho Public Utilities Commission (“Commission”) to reconsider Order No. 30996 dated February 5, 2010 (“Order”). In the Order, the Commission denied the Application of TracFone for designation as an Eligible Telecommunications Carrier (“ETC”) without prejudice. The Order concludes that TracFone does not meet the legal standard for designation as an ETC and that TracFone was required to obtain a certificate of authority from the Idaho Office of the Secretary of State (“Secretary of State”). The Order also relies on factual errors regarding the Lifeline service being provided in Idaho by wireless ETCs. As will be explained in this petition, TracFone disagrees with certain legal conclusions set forth in the Order. It also provides herein information which contradicts the Order’s conclusion regarding other ETCs’ services.

Accordingly, TracFone asks the Commission to grant reconsideration and issue an order on reconsideration granting TracFone's ETC Application.¹ In accordance with IDAPA 31.01.01.331.03, TracFone requests reconsideration by an evidentiary hearing.

INTRODUCTION

On October 29, 2009, TracFone applied to the Commission for designation as an ETC solely for the purpose of providing Lifeline service to eligible low-income consumers in Idaho. As stated in its Application, TracFone will only seek funds from the low-income portion of the federal Universal Service Fund ("USF"). TracFone will not seek any funds from the high cost portion of the federal USF.² On January 15, 2010, Commission Staff submitted a decision memorandum recommending that the Commission deny TracFone's ETC Application. Neither TracFone nor its counsel received a copy of the Staff's decision memorandum prior to issuance of the Order. TracFone recognizes that there is no Commission requirement that it be served with the decision memorandum. However, if TracFone had been made aware of the Staff's concerns it could have worked with Staff to resolve them and thereby conserved Commission resources related to this matter.

The Order states that TracFone failed to meet the statutory requirements for ETC designation as set forth in 47 U.S.C. § 214(e)(1) and Commission Order No. 29841, but does not identify which particular requirements TracFone has failed to meet. Order, at 2. The Order also

¹ Simultaneously with the filing of this petition for reconsideration, TracFone is submitting an amended application for designation as an ETC. That amended application addresses and cures any defects with the previous application which have been noted by the Commission. The Commission may wish to consider the amended application rather than the legal issues raised in the reconsideration petition. TracFone is filing both documents in an effort to expedite resolution of its request for designation as an ETC so that it may commence offering its SafeLink Wireless® Lifeline service to low-income Idaho households at the earliest possible time.

² The Order, at page 1, states that TracFone "will not seek funds from the federal Universal Service Fund." As explained above, TracFone will only seek funds from the low-income portion of the federal USF.

concludes that designation of TracFone as an ETC would not be in the public interest because TracFone's failure to maintain a certificate of authority to conduct business in Idaho indicates a lack of commitment to consumer service. Id. Finally, the Order finds that designating TracFone as an ETC would not provide any additional benefit to low-income consumers in Idaho because there are already several wireless ETCs providing the same service TracFone proposes to offer. Id. TracFone respectfully disagrees with these conclusions and does not believe that they justify denial of TracFone's ETC Application.

ARGUMENT

I. TracFone Meets the Requirements in 47 U.S.C. § 214(e)(1) for Designation as an ETC.

Section 214(e)(2) of the Communications Act provides that a State commission "shall . . . upon request designate a common carrier that meets the requirements of paragraph 1 [of Section 214(e)] as an eligible telecommunications carrier for a service area designated by the State commission." 47 U.S.C. §214(e)(2). Section 214(e)(1) has two requirements: (A) the ETC must offer the services that are supported by Federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services; and (B) the ETC must advertise the availability of such services and the charges therefor using media of general distribution. The Commission also lists a third requirement for designation as an ETC: the telecommunications provider must be a "common carrier" as defined in 47 U.S.C. § 153(1)). Order, at 2 (citing Order No. 29841, at 2). The Commission states in the Order that "[a]fter a thorough review of TracFone's ETC request and Staff's recommendation, the Commission finds that TracFone has failed to meet the statutory requirements of for ETC designation as set forth in 47 U.S.C. § 214(e)(1) and Commission Order No. 20841." Order, at 2. Nowhere does the Order provide any explanation as to the basis on which the Commission

has concluded that TracFone failed to meet either the statutory requirements of 47 U.S.C. § 214(e)(1) or the requirement articulated at Commission Order No. 20841. As explained in the following paragraphs, TracFone meets each of those requirements.

First, TracFone is a common carrier as that term is defined in the Communications Act. A “common carrier” is “any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy.” 47 U.S.C. § 153(10). TracFone is a carrier that offers its services for hire in interstate communication by radio. Indeed, TracFone has been authorized by the Federal Communications Commission (“FCC”) as a common carrier pursuant to Section 214 of the Communications Act of 1934, as amended (47 U.S.C. § 214).³ Nothing in the Order or the Staff’s decision memorandum indicates that TracFone is not a common carrier as that term is defined in the Communications Act.

Second, as explained in detail in the ETC Application, TracFone recognizes that as a reseller it does not use any of its own facilities to offer its services. However, the FCC exercised its statutory authority granted to it by Congress at Section 10 of the Communications Act (47 U.S.C. § 160), to forbear from application of the facilities requirement to TracFone. Specifically, the FCC granted TracFone’s request that it forbear from application or enforcement of Section 214(e)(1)(A) of the Communications Act (47 U.S.C. § 214(e)(1)(A)) and Sections 54.201(d)(1) and 54.201(i) of the FCC’s Rules (47 C.F.R. §§ 54.201(d)(1) and 54.201(i)). Those provisions require an ETC to offer services, at least in part, using its own facilities.⁴ Section

³ TracFone is required to remit to the FCC and does remit FCC Form 499 (Telecommunications Reporting Worksheet). All telecommunications common carriers providing interstate telecommunications service are required to submit FCC Form 499 reports.

⁴ Petition of TracFone Wireless, Inc. for Forbearance from 47 USC § 214(e)(1)(A) and 47 CFR § 54.201(i), 20 FCC Rcd 15095 (2005) (“FCC Forbearance Order”).

10(e) of the Communications Act (47 U.S.C. § 160(e)) provides that a State commission may not enforce any provision of the Communications Act (which includes Section 214(e)(1)(A)) that the FCC has decided to forbear from applying pursuant to Section 10(a). Therefore, state commissions are required to act in accordance with FCC forbearance decisions, including the FCC Forbearance Order. Accordingly, as a result of the FCC Forbearance Order, TracFone is in compliance with 47 U.S.C. § 214(e)(1)(A).

Third, Section 214(e)(1)(B) requires that ETCs advertise the availability of their services supported by the USF, including Lifeline service, using media of general distribution. TracFone described in its ETC Application how it would advertise the availability of its Lifeline service using media of general distribution and included examples of such advertisements. See ETC Application, at 14-15 and Exhibit 7. TracFone's amended ETC application being filed simultaneously with this petition for reconsideration contains the same detailed description of TracFone's advertising at pages 16-17 and Exhibit 9. TracFone has been designated as an ETC in 24 jurisdictions and is currently providing Lifeline service to nearly three million qualified low-income households in 21 jurisdictions. No state commission that has designated TracFone as an ETC has concluded that the quality and quantity of TracFone's advertising of its Lifeline service does not comply with the requirement of 47 U.S.C. § 214(e)(1)(B). Moreover, the fact that TracFone has enrolled so many new Lifeline customers in those states demonstrates that its advertising has been effective and that its advertising is reaching the low-income households who are intended to benefit from the Lifeline program. TracFone fully expects that its advertising will produce similar results in Idaho.

For the reasons described in the preceding paragraphs, the Order's conclusion that TracFone does not meet the requirements of 47 U.S.C. § 214(e)(1) and Commission Order No.

29841 is not supported by any facts identified in the Order and is incorrect as a matter of law. For that reason, TracFone respectfully asks that the Commission reconsider that conclusion and conclude that TracFone meets the requirements of 47 U.S.C. 214(e)(1).

II. Designation of TracFone as an ETC Would Be in the Public Interest.

The Order concludes that granting TracFone's ETC Application would not be in the public interest because: (1) TracFone's failure to make certain filings with the Secretary of State and (2) TracFone's Lifeline service would not provide any additional benefit to low-income wireless subscribers in Idaho or provide significant competition because there are currently several wireless ETCs in Idaho. Order, at 3.

As stated in the Order, at the time TracFone filed its ETC Application, it did not have a certificate of authority from the Secretary of State to transact business in Idaho. TracFone initially applied for a certificate of authority with the Secretary of State in 1997 when it commenced providing wireless service in Idaho. However, upon further review of the applicable law, TracFone determined that it was not "transacting business" in Idaho within the meaning of that term under applicable Idaho law. Specifically, Idaho Code, § 10-1-1501 provides that a foreign corporation may not transact business in Idaho until it receives a certificate of authority from the secretary of state. Section 10-1-1501(2) of the Idaho Code lists several activities that do not constitute transacting business. The following excluded activities from that statutory list are applicable to TracFone: (e) selling through independent contractors (TracFone does not have any retail locations in Idaho; it sells its service through independent third-party vendors); (f) soliciting or procuring orders, where the orders require acceptance outside this state before becoming binding contracts and where the contracts do not involve any local performance other than delivery or installation (all orders for service are accepted by TracFone outside of Idaho);

and (k) transacting business in interstate commerce (TracFone's customers may purchase service over the Internet and all handsets and accessories are delivered via interstate commerce). Therefore, TracFone is not transacting business in Idaho under the state law.

However, when TracFone decided to apply to state commissions for ETC status in several states, it concluded that designation as an ETC and provision of Lifeline service in the states would constitute transacting business in those states. For that reason, it elected to register as a foreign corporation in all states where it sought ETC designation. At the time of the filing of its ETC Application TracFone had not yet completed the registration process in Idaho. TracFone has subsequently obtained a certificate of authority from the Secretary of State. Simultaneously with filing this Petition, TracFone is filing an amended ETC Application to address deficiencies identified in the Order. A copy of TracFone's certificate of authority from the Secretary of State and a copy of its certificate of good standing are attached to its amended application. Consistent with maintaining a certificate of authority, TracFone will comply with all applicable reporting requirements. Given that TracFone now has a certificate of authority and is in good standing with the Secretary of State, TracFone's prior failure to comply with filing requirements -- requirements that were not applicable to TracFone prior to seeking ETC designation -- does not warrant a finding that designation of TracFone as an ETC for the limited purpose of providing Lifeline service to low-income Idaho households would not serve the public interest.

The Order further holds that TracFone's failure to comply with Secretary of State filing requirements is "strong evidence that TracFone maintains a rather limited and tangential commitment to consumer service in the state if Idaho." The fact that TracFone did not make annual filings with the Secretary of State that TracFone concluded were not applicable to it at the

time has no bearing on TracFone's commitment to consumer service. As stated in its ETC Application, TracFone has demonstrated its commitment to high service quality by committing to comply with the CTIA - The Wireless Association® Consumer Code for Wireless Service.

ETC Application, at 14. Indeed, Commission Order No. 29841 states:

Given the general agreement among the commenters, the Commission adopts the FCC's proposed guidelines regarding customer protection and service. Recognizing that there may be different standards applicable to the ETC applicant based on best practices in the industry and the technology involved, the Commission will require that all wireless applicants for ETC designation agree to comply with the CTIA Code.

Order No. 29841, at 11.

Thus, pursuant to Order No. 29841, the Commission may consider carriers' service commitments such as TracFone's commitment to comply with the CTIA Code. An ETC's commitment to consumer service is not measured by whether it made certain filings with the Secretary of State, but rather by how it devotes resources to serving consumers and by stated commitments to comply with generally-recognized industry standards, including the CTIA Code -- a code which has been recognized both by the Commission and by the FCC as being an appropriate service quality commitment standard for wireless service providers.

As explained in Order No. 29841, "in determining whether ETC designation is in the public interest, this Commission shall consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering." Order No. 29841, at 16. TracFone respectfully disagrees with the Order's conclusion that designating TracFone as an ETC "would not provide any additional benefit to low-income wireless subscribers in Idaho or provide significant competition within the proposed service area, as several wireless ETCs are currently providing the same wireless Lifeline service TracFone proposes to offer." Order, at 3.

The assertion that several wireless ETCs are providing the same Lifeline service as TracFone is not supported by recent data published by the Universal Service Administrative Company ("USAC"), the administrator of the federal USF. USAC tracks ETCs in every state and maintains data on the amounts of Lifeline support received by each ETC. A review of USAC's data reveals that while there are several wireless ETCs in Idaho, only one of them actually provides Lifeline service to low-income Idaho households.

The Staff's decision memorandum indicates that the following wireless ETCs provide service in Idaho: Inland Cellular, Syringa Wireless (includes ClearTalk), CTC Telecom dba Snake River PCS, Alltel (now Verizon Wireless), and Edge Wireless (AT&T Mobility). USAC's most recent report to the FCC indicates that of the companies listed, only ClearTalk and Syringa Wireless (which are now one company owned by Syringa Wireless) are receiving any Lifeline support. See USAC FCC Filings, Second Quarter Appendices - 2010, LI05 - Annual Low Income Amounts by State and Company through 3Q2009, excerpt attached as Exhibit 1. Some of the wireless ETCs are relying on their ETC status solely to receive high cost support, i.e., Edge Wireless and Inland Cellular. See USAC FCC Filings, Second Quarter 2010 Appendices - 2010, HC01A - High Cost Support Projected by State by Study Area - 2Q2010, excerpt attached as Exhibit 2.

The existence of one other wireless ETC providing Lifeline service anywhere in Idaho provides no meaningful competitive choice to Idaho consumers. While the other wireless providers listed by the Staff may be ETCs, they are not receiving any Lifeline support, and as such are not providing Lifeline service to any low-income Idaho consumers. Moreover, the one

wireless ETC that has Lifeline customers only serves approximately 1,600 Lifeline customers.⁵

TracFone's experience in other states indicates that its SafeLink Wireless® Lifeline service is an attractive alternative to many low-income consumers. As stated above, TracFone provides nearly three million households with Lifeline service in 21 jurisdictions. The existence of only one wireless ETC that has an insignificant number of Lifeline customers does not support a conclusion that there would be no additional benefit to low-income Idaho consumers if TracFone were to be designated as an ETC. Indeed, especially given Idaho's low statewide Lifeline participation rate of only 22.1 percent of eligible low-income households, TracFone's Lifeline service would be an attractive option to the nearly eighty percent of low-income Idaho households which are eligible to participate in Lifeline, but are not doing so.

Finally, TracFone notes that the one wireless ETC in Idaho which is offering Lifeline service is not "providing the same wireless Lifeline service TracFone proposes to offer." Order, at 3. TracFone's Lifeline service is unique in that it will be free to qualified subscribers and will include a free E911-compliant wireless handset. The Lifeline programs offered by other ETCs in Idaho provide participating consumers with discounts below carriers' standard rates. However, enrolled Lifeline customers still must pay the ETC's discounted charges, as well as purchase telephone equipment necessary to use those discounted services. TracFone's free SafeLink Wireless® service in Idaho will include 67 minutes of airtime each month (with unused minutes carried over to the following months so long as the customers remain enrolled in the program) and vertical features like call waiting, voice mail, and caller ID at no additional charge. Those

⁵ Syringa Wireless and ClearTalk received a total of \$193,116 in Lifeline support in 2008. Assuming that the amount was spread evenly throughout the year and that the maximum Lifeline support amount of \$10.00 per customer per month was received, the companies had 1,609 customers (193,116 divided by 12, and then taking that quotient and dividing it by 10 equals 1,609).

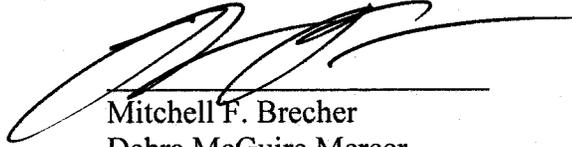
minutes may be used for calls to or from anywhere in the United States -- local or long distance, intrastate or interstate. They may also be used for calls to more than 100 international destinations, and there are no roaming charges, which enables TracFone's Lifeline customers to use the service anywhere. Also, TracFone Lifeline customers will always have access to 911, irrespective of their activation status or whether they have remaining airtime minutes. Access to 911 is an important public safety benefit. Mobile access to 911 is an especially important public safety benefit since many emergency situations necessitating calls to 911 occur away from one's home. In addition, TracFone has no activation charge. Given Idaho's low Lifeline participation rate, the existence of only one wireless ETC that has any Lifeline customers, and the unique benefits of TracFone's SafeLink Wireless® Lifeline service, the public interest would be served by the Commission's designation of TracFone as an ETC for the purpose of providing Lifeline service.

CONCLUSION

As explained above, the asserted bases for denying TracFone's ETC Application are not supported by law or fact. TracFone has significantly raised the level of Lifeline participation in every state where the service is available. Most importantly, the entire benefit is funded by the federal USF and by TracFone and not by any state or any state's rate payers, tax payers or by any state's universal service fund. TracFone is anxious to bring this important federally-funded program to Idaho and to the State's low-income households. For the foregoing reasons, TracFone respectfully requests the Commission to grant reconsideration of its Order, and promptly approve TracFone's amended ETC Application, and that it be designated as an ETC in Idaho.

Respectfully submitted,

TRACFONE WIRELESS, INC.



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Counsel for TracFone Wireless, Inc.

February 26, 2010

Exhibit 1

Universal Service Administrative Company
Annual Low Income Support Amounts by State and Company
through 3Q2009

STUDY AREA	SPIN NAME	NON-TRIBAL LIFELINE \$		TRIBAL LIFELINE \$		NON-TRIBAL LINK UP \$		TRIBAL LINK UP \$		TOTAL \$		NON-TRIBAL LINK UP \$		TRIBAL LINK UP \$		TOTAL \$	
		2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008	2008
472213	ALBION TEL. CO. INC. DBA ATC COMMUNICATIONS	\$20,303	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$20,303	\$0	\$15	\$0	\$0	\$0	\$17,040	\$17,040
472215	CAMBRIDGE TEL. CO. INC.-ID	\$16,237	\$0	\$114	\$0	\$0	\$0	\$0	\$0	\$16,919	\$0	\$76	\$0	\$0	\$0	\$17,430	\$17,430
472218	CUSTER TEL. COOPERATIVE INC.	\$11,076	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$11,076	\$0	\$0	\$0	\$0	\$0	\$9,395	\$9,395
472220	FILER MUTUAL TELEPHONE COMPANY - ID	\$9,874	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$9,874	\$0	\$25	\$0	\$0	\$0	\$7,755	\$7,755
472221	FARMERS MUTUAL TEL. CO. LTD. - ID	\$23,187	\$0	\$280	\$0	\$0	\$0	\$0	\$0	\$23,467	\$0	\$60	\$0	\$0	\$0	\$14,651	\$14,651
472222	FREMONT TELCO CO.	\$20,213	\$0	\$90	\$0	\$0	\$0	\$0	\$0	\$20,328	\$0	\$240	\$0	\$0	\$0	\$15,433	\$15,433
472223	CENTURY TEL. OF THE GEM STATE - ID	\$8,491	\$1,017	\$0	\$0	\$0	\$0	\$0	\$0	\$9,508	\$845	\$14	\$0	\$0	\$0	\$5,762	\$5,762
472225	CENTURY TEL. OF IDAHO INC.	\$28,986	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$28,986	\$0	\$0	\$0	\$0	\$0	\$21,397	\$21,397
472226	MIDVALE TEL. EXCH. INC.	\$3,874	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,874	\$0	\$0	\$0	\$0	\$0	\$2,546	\$2,546
472227	MUD LAKE TEL. COOP. INC. ASSOC.	\$3,389	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,389	\$0	\$0	\$0	\$0	\$0	\$2,576	\$2,576
472230	POTLATCH TELEPHONE COMPANY INC.	\$6,705	\$0	\$34	\$0	\$0	\$0	\$0	\$0	\$6,739	\$0	\$27	\$0	\$0	\$0	\$6,145	\$6,145
472231	PROJEKT MUTUAL TEL. COOP. ASSN.	\$51,206	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$52,677	\$0	\$0	\$0	\$0	\$0	\$47,357	\$47,357
472232	DIRECT COMMUNICATIONS ROCKLAND	\$17,724	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$17,724	\$0	\$0	\$0	\$0	\$0	\$5,966	\$5,966
472233	RURAL TELEPHONE COMPANY - ID	\$1,676	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,676	\$0	\$0	\$0	\$0	\$0	\$1,206	\$1,206
472234	TROY TELEPHONE COMPANY	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
472235	SILVER STAR TEL. CO. INC.-ID	\$8,217	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$8,217	\$0	\$0	\$0	\$0	\$0	\$1,091	\$1,091
472416	VERIZON NORTHWEST INC. - ID	\$493,384	\$15,808	\$3,315	\$0	\$0	\$0	\$0	\$0	\$512,783	\$11,468	\$2,790	\$0	\$0	\$0	\$5,446	\$5,446
472423	INLAND TELEPHONE COMPANY - ID	\$1,660	\$0	\$13	\$0	\$0	\$0	\$0	\$0	\$1,673	\$0	\$0	\$0	\$0	\$0	\$1,351	\$1,351
474437	CITIZENS TEL. CO. OF ID. DBA FRONTIER	\$137,639	\$0	\$282	\$0	\$0	\$0	\$0	\$0	\$138,325	\$109,065	\$239	\$0	\$0	\$0	\$264	\$109,628
475103	QWEST CORPORATION - ID	\$2,154,089	\$40,239	\$28,020	\$240	\$0	\$0	\$0	\$0	\$2,222,658	\$1,805,613	\$26,115	\$195	\$0	\$0	\$4,246	\$1,665,513
475162	QWEST CORPORATION - IDAHO	\$28,356	\$10,979	\$3,041	\$165	\$0	\$0	\$0	\$0	\$43,521	\$171,442	\$1,905	\$110	\$0	\$0	\$443	\$183,709
479003	IAT COMMUNICATIONS DBA CLEAR TALK (ID)	\$135,600	\$55,775	\$0	\$0	\$0	\$0	\$0	\$0	\$192,375	\$107,765	\$0	\$0	\$0	\$0	\$0	\$135,218
479008	VCI COMPANY - ID	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
479008	SYRINGA WIRELESS, LLC	\$741	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$741	\$39,755	\$0	\$0	\$0	\$0	\$0	\$45,005
IDAHO Total		\$3,372,205	\$123,818	\$35,169	\$405	\$9,449	\$3,541,046	\$2,573,099	\$90,166	\$31,866	\$305	\$6,716	\$2,701,852	\$2,701,852			

Exhibit 2

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY

High Cost Support Projected by State by Study Area

ID	Carrier	Type	State	SAC	Total High Cost Monthly	Total High Cost Study Area Quarterly
ID	472213 ALBION TEL CO-ATC	R	Y	C	\$ 318,966	\$ 956,898
ID	472215 CAMBRIDGE TEL CO	R	Y	C	\$ 122,721	\$ 368,163
ID	472218 CUSTER TEL COOP	R	Y	C	\$ 327,959	\$ 983,877
ID	472220 FILER MUTUAL TEL-ID	R	Y	C	\$ 95,357	\$ 286,071
ID	472221 FARMERS MUTUAL TEL	R	Y	C	\$ 55,167	\$ 165,501
ID	472222 FREMONT TELCOM	R	Y	C	\$ 201,510	\$ 604,530
ID	472223 CENTURY-GEM STATE-ID	R	Y	C	\$ 75,003	\$ 225,009
ID	472225 CENTURYTEL OF IDAHO	R	Y	C	\$ 85,404	\$ 256,212
ID	472226 MIDVALE TEL EXCH INC	R	Y	C	\$ 104,146	\$ 312,438
ID	472227 MUD LAKE TEL COOP	R	Y	A	\$ 46,252	\$ 138,756
ID	472230 POTLATCH TEL CO INC	R	Y	C	\$ 23,559	\$ 70,677
ID	472231 PROJECT MUTUAL TEL	R	Y	C	\$ 139,281	\$ 417,843
ID	472232 DIRECT COMM-ROCKLAND	R	Y	C	\$ 124,408	\$ 373,224
ID	472233 RURAL TEL CO - ID	R	Y	C	\$ 162,985	\$ 488,955
ID	472295 SILVER STAR TEL- ID	R	Y	C	\$ 576,063	\$ 1,728,189
ID	472416 VERIZON N'WEST-ID	R	Y	C	\$ 960,547	\$ 2,881,641
ID	472423 INLAND TEL-ID	R	Y	C	\$ 46,388	\$ 139,164
ID	474427 CITIZENS-FRONTIER-ID	R	Y	C	\$ 243,897	\$ 731,691
ID	475103 QWEST CORP-ID	N	Y	C	\$ -	\$ -
ID	475162 QWEST CORP-IDAHO	R	Y	C	\$ 30,102	\$ 90,306
ID	479003 NTCH- IDAHO, INC.	N	Y	X	\$ -	\$ -
ID	479003 NTCH- IDAHO, INC.	R	Y	X	\$ -	\$ -
ID	WESTERN WIRELESS CORPORATION (ID)	N	Y	X	\$ -	\$ -
ID	WESTERN WIRELESS CORPORATION (ID)	R	Y	X	\$ -	\$ -
ID	EDGE WIRELESS, LLC	R	Y	X	\$ 721,514	\$ 2,164,541
ID	WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP DBA INLAND	R	Y	X	\$ 79,631	\$ 238,893
ID	CELLULAR	R	Y	X	\$ 160,009	\$ 480,027
ID	Syringa Wireless, LLC	R	Y	X	\$ 14,439	\$ 43,317
ID	CTC Telecom, Inc	R	Y	X	\$ -	\$ -

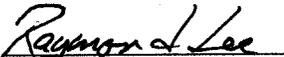
ICLS 508 Revisions (See HC 22 and HC 24 for details) \$ 10,356,393

LEGEND:
 Rural R - Rural Carrier
 N - Non-Rural Carrier
 Type A - Average Schedule Incumbent Total: \$ 1,239,123,176
 C - Cost Incumbent
 X - Competitive

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 26th day of February 2010, served the forgoing Petition for Reconsideration of Applicant TracFone Wireless, Inc. upon the following by sending a copy thereof via electronic mail to:

Grace Seaman
Utilities Analyst
Idaho Public Utilities Commission
472 W Washington
Boise, ID 83702
grace.seaman@puc.idaho.gov


Raymond Lee