

August 24, 2010

Chairman Ted Boyer
Commissioner Richard Campbell
Commissioner Ron Allen
Utah Public Service Commission
160 East 300 South
Salt Lake City, Utah 84114

In the Matter of Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Limited Purpose of Offering Lifeline Service to Qualified Households **Docket No. 09-2511-01**

Dear Commissioners:

Receipt of the TracFone Wireless Inc. ("TracFone") expanded lifeline offering dated August 12, 2010 adding three new monthly plans to the revised plan previously offered leaves us puzzled and perplexed. We are puzzled because the company's four new monthly plans completely revising the company's original telephone Lifeline offering provide no evidence as to how or why they were conceived. We are perplexed because the other parties in this case have acted according to the process outlined and conducted by the Utah Public Service Commission over the past year but TracFone for whatever supposed reason, or reasons, has not.

Many legitimate questions have been raised by the various intervenors about the original TracFone Lifeline proposal. Those questions may or may not be the same when applied to the expanded offering. But who knows? Without a full hearing we simply do not know.

While it is encouraging there might be better offerings for the low income people the proposed plans are supposed to serve it remains incumbent upon the PSC to determine what is going on and why. As we asked in our July 29th letter to the commission on this subject ... "If the bundle of minutes offered is so flexible what else in the service offering is open to examination, debate and ultimately change in the proposed Lifeline service?"

We believe, as we have said twice before, the Utah PSC should slow things down, take a deliberate approach and start from the beginning. The new plans offered by TracFone demand new consideration. Again, the commission should continue the TracFone hearing, conduct a generic hearing on what telephone Lifeline service or services (including the existing landline Lifeline service) would best serve those eligible, take into account the progress of the relevant federal Lifeline proceeding and set a timetable for establishing effective Lifeline implementation in the state.

At Crossroads Urban Center we are painfully aware what affordable, reliable telephone Lifeline service means for those we serve. We are also painfully aware of the harm that

could be done if the Lifeline service is not offered carefully and competently. The advent of comprehensive wireless Lifeline telephone service in Utah is a big deal and we need to do it right from the beginning. A generic proceeding like the one we propose is the next best step.

Thank you,

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