

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Virgin Mobile USA, L.P.)	
)	Docket No. 18-2521-02
Petition for Limited Designation as an)	
Eligible Telecommunications Carrier)	
)	

**PETITION OF VIRGIN MOBILE USA, L.P. TO AMEND ITS DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE
UTAH UNIVERSAL SERVICE FUND SUPPORT**

I. INTRODUCTION

Virgin Mobile USA, L.P. (“Virgin Mobile” or the “Company”) respectfully submits this Petition to Amend its Designation as an Eligible Telecommunications Carrier (“ETC”) to Receive Utah Universal Service Fund Support for Lifeline Service.¹ On May 25, 2011, in Docket No. 10-2521-01, the Public Service Commission of Utah (“Commission”) designated Virgin Mobile as a wireless ETC, pursuant to 47 U.S.C. § 214(e)(2), thereby making Virgin Mobile eligible to receive support by the federal Universal Service Fund (“USF”) Lifeline program in Utah (“Original ETC Designation”). Virgin Mobile has operated as an ETC in Utah, in good standing, since then. By this petition, Virgin Mobile seeks to amend its ETC designation to include authorization to receive support from the Utah Universal Public Telecommunications Service Support Fund (“UUSF”) for Lifeline service to eligible low-income consumers throughout the State of Utah,² pursuant to Utah Code § 54-8b-15 (2017), Utah Administrative Code R746-8-403, and in compliance with Ordering Paragraph 4 in Docket No. 10-2521-01 dated May 25, 2011,³ in the same wire centers as were

¹ With this petition, Virgin Mobile submits the declaration of Elaine M. Divelbliss, General Counsel for Sprint Corporation, parent of Virgin Mobile, attached hereto as Exhibit 1.

² Virgin Mobile still does not seek to provide services supported by the federal USF’s high-cost program.

³ Ordering Paragraph 4 in Docket No. 10-2521-01 dated May 25, 2011, states “[t]his order does not authorize Virgin Mobile to receive state USF support. Any such support will require separate Commission authorization.”

originally included in Virgin Mobile's earlier ETC application (attached hereto as Exhibit 2).

Virgin Mobile respectfully requests Commission authorization to receive UUSF support for Lifeline service within the State of Utah.

As more fully described below, Virgin Mobile satisfies the requirements for designation as an ETC eligible to receive distributions from the UUSF and is currently offering Lifeline services in Utah. The Commission's grant of Virgin Mobile's petition will serve the public interest by allowing low-income Utah consumers to receive enhanced Lifeline offerings from Virgin Mobile and to benefit from competition by having the ability to choose from a variety of wireless service providers and high-quality service offerings.

A. Overview of Petitioner and Service Offerings

Virgin Mobile, a Delaware limited partnership with its principal place of business at 10 Independence Boulevard, Warren, New Jersey 07059, is a wholly owned subsidiary of Sprint Corporation, a Delaware corporation with its principal offices located at 6200 Sprint Parkway, Overland Park, Kansas 66251.⁴ Pursuant to the Original ETC Designation, the Company is a commercial mobile radio service provider designated by the Commission as an ETC for purposes of participation in the federal Lifeline program throughout Utah.

In addition to the State of Utah, Virgin Mobile has been designated as a wireless ETC in the states of Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Kansas, Kentucky, Louisiana, Idaho, Illinois, Indiana, Iowa, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Virginia, Washington, West Virginia, and Wisconsin.

⁴ See Docket No. 18-2521-01, Notice of Change of Control – Sprint Corporation and SoftBank Group Corporation reorganization of intermediate subsidiaries and stock allocation, for additional information.

B. The Petition to Amend its ETC Designation is Consistent with Recent Precedent in Other States

Virgin Mobile participates in and receives or is eligible to receive support from the California LifeLine program,⁵ the Oregon Telephone Assistance Program (“OTAP”),⁶ the Idaho Telecommunications Service Assistance Program (“ITSAP”),⁷ the Texas Lifeline Program,⁸ and the Wisconsin Lifeline Program.⁹ Granting Virgin Mobile’s petition to amend its designation as an ETC will enable Assurance Wireless to offer enhanced service under the brand “Assurance Wireless Brought To You By Virgin Mobile” and will improve competition for wireless Lifeline services, providing many lower-income consumers in Utah with a more robust choice of service offerings. This competition represents a significant step towards ensuring that all low-income customers share in the many benefits associated with access to high-quality wireless services, which a study found to be a vital economic resource for low-income consumers leading to improved wage levels and personal safety.¹⁰

⁵ See Resolution T-17284 (May 5, 2011), in which the Public Utilities Commission of California granted ETC status to Virgin Mobile authorizing it to provide Lifeline service under the federal Lifeline program in California. Virgin Mobile subsequently obtained authority to provide California LifeLine Service in Rulemaking 11-03-013, Decision 14-01-036 (Jan. 16, 2014). Advice Letter 6 expanded Virgin Mobile’s service territory (Attachment A to Advice Letter 6 includes a map showing state boundaries as the boundaries of Virgin Mobile’s ETC designation area in California). The Advice Letter Certificate (approved Nov. 24, 2014) accepted Advice Letter 6.

⁶ See *In the Matter of Virgin Mobile USA, L.P., Petition for Limited Designation as an Eligible Telecommunications Carrier*, Docket No. UM-1522, Order No. 12-015 (Jan. 23, 2012), in which the Public Utilities Commission of Oregon granted Virgin Mobile’s Petition, enabling it to receive federal USF support. On October 26, 2017, pursuant to Order No. 12-015, Paragraph 25 of Appendix A, Virgin Mobile filed a letter in Docket No. UM-1522, Notice of Compliance and Update to Terms of Service, providing notice of its intention to make enhancements to its Lifeline offering in Oregon in exchange for collecting state subsidy support from the OTAP.

⁷ See *In the Matter of the Application of Virgin Mobile USA, L.P. for Limited Designation as an Eligible Telecommunications Carrier*, Case No. VMU-T-11-01, Order No. 32645 (Sept. 19, 2012), in which the Idaho Public Utilities Commission granted ETC status to Virgin Mobile, enabling it to participate in the federal Lifeline program. See also Letter notification to Idaho Public Utilities Commission regarding state program (Sept. 2, 2016).

⁸ See *Application of Virgin Mobile for Designation as an Eligible Telecommunications Carrier*, Docket No. 38056, Order No. 6 (May 18, 2010); see also *Application of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Provider*, Docket No. 47580, Order No. 4 (Nov. 29, 2017).

⁹ See *Application of Virgin Mobile USA, L.P., for Designation as an Eligible Telecommunication Carrier*, Public Service Commission of Wisconsin Docket No. 9592-T1-100, Final Decision PSC REF#: 160887 (effective Mar. 7, 2012), designating Virgin Mobile as an ETC eligible to receive federal USF funding for Lifeline service. See also *Application of Virgin Mobile USA, L.P., to Expand its Designation as an Eligible Telecommunication Carrier*, Docket No. 9592-TI-101, Final Decision PSC REF#: 331420 (effective Sept. 27, 2017), designating Virgin Mobile as an ETC, for the purpose of receiving state and federal Lifeline support.

¹⁰ See Nicholas P. Sullivan, “Cell Phones Provide Significant Economic Gains for Low-Income American Households: A Review of Literature and Data from Two New Surveys,” April 2008.

II. VIRGIN MOBILE REQUESTS AMENDED ETC DESIGNATION IN ITS UTAH SERVICE AREA FOR PARTICIPATION IN THE STATE LIFELINE PROGRAM

A. Virgin Mobile Requests Amended ETC Designation for its Entire Service Territory

As a non-rural carrier, Virgin Mobile is required to describe the areas within which it requests ETC designation. The Company requests amended ETC designation for its entire service area in Utah as granted in the Commission's Original ETC Designation in Docket No. 10-2521-01, dated May 25, 2011.¹¹

B. Description of Prepaid Lifeline Offering

Virgin Mobile continues to brand its prepaid Lifeline service "Assurance Wireless Brought To You By Virgin Mobile." Assurance Wireless customers enjoy the same type of service features and functionalities as other Virgin Mobile prepaid customers. In keeping with the evolution of the wireless market under the current plan, eligible customers with Feature phones receive 750 anytime prepaid voice minutes and unlimited free texts (no data is included), and eligible customers with Android phones receive 350 anytime prepaid voice minutes, unlimited free texts and 1 GB of free data per month at no charge with additional blocks of service available entirely at the option of the customer.¹² Upon the Commission's approval for Virgin Mobile to participate in the UUSF program, Virgin Mobile will meet the R746-8-403 Lifeline Support obligations and will supplement the service plan offering for all eligible customers to include 750 anytime prepaid voice minutes, unlimited free texts and 1 GB of free data per month, regardless of the handset type.

Eligible customers will continue to receive a free handset and service on a month-to-month basis without subscribing to a long-term contract or incurring activation charges or connection fees. Consistent with the current offerings: (1) the rates for service under all plans include all applicable

¹¹ A list of wire centers for which Virgin Mobile requests amended ETC designation is attached hereto as Exhibit 2. Virgin Mobile will continue to serve these wire centers. By this petition, Virgin Mobile is not seeking to amend its service area.

¹² Descriptions of these service offerings are available on the Assurance Wireless website: <http://www.assurancewireless.com/Public/MorePrograms.aspx>.

taxes and fees; (2) customers can use their monthly minutes to place calls nationwide; and (3) voicemail, caller I.D. and call waiting services are included at no additional charge. In addition, the customers will continue to receive uninterrupted access to 911 emergency and customer care services even if their monthly minutes are depleted.

III. VIRGIN MOBILE SATISFIES THE REQUIREMENTS FOR PARTICIPATION IN THE UTAH UNIVERSAL SERVICE PROGRAM

The Commission previously designated Virgin Mobile as an ETC eligible to receive funding from the federal Universal Service Program. As discussed herein, Virgin Mobile satisfies the requirements of Utah Code § 54-8b-15¹³ and Utah Administrative Code R746-8-403¹⁴ necessary for designation as an ETC eligible to participate in the UUSF program.

Virgin Mobile currently provides Lifeline services throughout its designated service area in Utah pursuant to its current ETC designation and will continue to offer essential telecommunication services to all customers in its designated service area in Utah.

Virgin Mobile currently advertises its Lifeline services using media of general distribution in accordance with the requirement in section 54.201(d)(2) of the Federal Communications Commission's rules and will continue such advertisements. A copy of a sample advertisement is attached hereto as Exhibit 3. Virgin Mobile continues to provide Lifeline services and meet all of the applicable federal eligibility requirements in 47 C.F.R. §§ 54.201 and 54.202(a) throughout its designated service area in Utah.

¹³ Section 54-8b-15(15)(a) provides that a facilities-based or nonfacilities-based wireless telecommunications provider is eligible for distributions from the UUSF "under the lifeline program described in Subsection (3)(b) for providing lifeline service that is consistent with the Federal Communications Commission's lifeline program for low-income consumers." Subsection (3)(b) states that the Commission shall use the UUSF to "fund a lifeline program that covers the reasonable cost to an eligible telecommunications carrier, as determined by the commission, to offer lifeline service consistent with the Federal Communications Commission's lifeline program for low-income consumers."

¹⁴ Virgin Mobile is in compliance, and will continue to comply, with the Commission's rules that apply to an ETC (defined in Utah Admin. Code R746-8-200(5) as "a provider that, if seeking to participate in the state Lifeline program: (a) is designated as an eligible telecommunications carrier by the commission in accordance with 47 U.S.C. Section 214(e); or (b) is designated by the FCC as a Lifeline Broadband Provider.")

IV. CONCLUSION

WHEREFORE, for all of the foregoing reasons, Virgin Mobile respectfully requests that the Commission grant this Petition to Amend Virgin Mobile's Designation as an Eligible Telecommunications Carrier to receive Utah Universal Service Fund support.

Respectfully submitted this 16th day of March, 2018.

VIRGIN MOBILE USA, L.P.

Kristin L. Jacobson

Kristin L. Jacobson
Sprint Corporation
900 7th Street, Suite 700
Washington, DC 20001
Tel: 707-816-7583
Kristin.L.Jacobson@sprint.com

EXHIBIT 1
DECLARATION

Declaration of Virgin Mobile USA, L.P.

I, Elaine M. Divelbliss, do hereby declare as follows:

1. I am General Counsel for Sprint Corporation, parent of Virgin Mobile USA, L.P., a Delaware limited partnership with its principal place of business at 10 Independence Boulevard, Warren, New Jersey 07059.

2. I have read Virgin Mobile's Petition to Amend its Designation as an Eligible Telecommunications Carrier in the State of Utah and confirm the information contained therein to be true and correct to the best of my knowledge.

3. To the best of my knowledge, Virgin Mobile, including all of its officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) of the Company are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 16, 2018

/s/ Elaine M. Divelbliss

Elaine M. Divelbliss
General Counsel

EXHIBIT 2
AUTHORIZED WIRE CENTERS

LIST OF ENTIRE WIRE CENTERS SERVED

CLLI	WIRE CENTERS	ILEC
KAMSUTXC	HEBER	ALL WEST - UT, INC.
CLVLUTMA	COALVILLE	ALL WEST COMMUNICATIONS, INC. - UTAH
RNDHUTXC	RANDOLPH	ALL WEST COMMUNICATIONS, INC. - UTAH
GRCYUTXC	GARDEN CITY	BEAR LAKE COMMUNICATIONS
CDCYUT08	CEDAR CITY	BEEHIVE TEL CO - UT
IBPHUTXC	IBAPAH	BEEHIVE TEL CO - UT
KOLBUTXC	KOLOB	BEEHIVE TEL CO - UT
VERNUTXC	VERNON	BEEHIVE TEL CO - UT
ECRCUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
HLPRUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
PRICUTMA	PRICE	CARBON/EMERY TELECOM, INC. - UT
WNDVUTMA	WENDOVER	CENTRAL TELCOM SVCS DBA CENTRACOM INTERA
FRVWUTXC	FAIRVIEW	CENTRAL UTAH TELEPHONE, INC.
BRCYUTXC	BEAR RIVER CITY	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
DELTUTXC	DELTA	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
FDNGUTXC	FIELDING	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
FLMRUTXC	FILLMORE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
HLDNUTXC	HOLDEN	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
HOWLUTXC	HOWELL	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
KNSHUTXC	KANOSH	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
LASLUTXC	LA SAL	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
LYNDUTXC	LYNNDYL	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
MEDWUTXC	MEADOW	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
MOABUTXC	MOAB	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
OKCYUTXC	OAK CITY	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
PRTGUTXC	PORTAGE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
SCIPUTXC	SCIPIO	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
SNVLUTXC	SNOWVILLE	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
THSNUTXC	THOMPSON	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
THTCUTXC	THATCHER	CITIZENS TELECOM-UTAH DBA FRONTIER COMM
EGMTUTAA	EAGLE MTN-CEDAR VALLEY	DIRECT COMMUNICATION CEDAR VALLEY, LLC
CSDLUTXC	CASTLEDALE	EMERY TELEPHONE DBA EMERY TELECOM
GNSNUTXC	GUNNISON	GUNNISON TELEPHONE CO.
SLKUTMA	RICHFIELD	PAC - WEST TELECOMM, INC. - UT
ALTAUTMA	ALTA-SNOWBIRD	QWEST CORPORATION
AMFKUTMA	AMERICAN FORK	QWEST CORPORATION
BEVRUTMA	BEAVER	QWEST CORPORATION
BNTFUTMA	BOUNTIFUL	QWEST CORPORATION
NSLKUTMA	BOUNTIFUL	QWEST CORPORATION
BGCYUTMA	BRIGHAM CITY	QWEST CORPORATION
CRNNUTMA	BRIGHAM CITY	QWEST CORPORATION
CLFDUTMA	CLEARFIELD	QWEST CORPORATION
LYTNUTMA	CLEARFIELD	QWEST CORPORATION
ROY UTMA	CLEARFIELD	QWEST CORPORATION
CTWDUTMA	COTTONWOOD	QWEST CORPORATION
FRTNUTMA	FARMINGTON	QWEST CORPORATION
GTVLUTMA	GRANTSVILLE	QWEST CORPORATION
HBCYUTMA	HEBER	QWEST CORPORATION
HLDYUTMA	HOLLADAY	QWEST CORPORATION

CLLI	WIRE CENTERS	ILEC
HYRMUTMA	HYRUM	QWEST CORPORATION
KYVLUTMA	KAYSVILLE	QWEST CORPORATION
KRNSUTMA	KEARNS	QWEST CORPORATION
LEHIUTMA	LEHI	QWEST CORPORATION
LOGNUTMA	LOGAN	QWEST CORPORATION
MAGNUTNM	MAGNA	QWEST CORPORATION
DRPRUTMA	MIDVALE	QWEST CORPORATION
MDVAUTMA	MIDVALE	QWEST CORPORATION
WJRDUTMA	MIDVALE	QWEST CORPORATION
MONRUTMA	MONROE	QWEST CORPORATION
MTGNUTMA	MORGAN	QWEST CORPORATION
MRGNUTMA	MOUNTAIN GREEN	QWEST CORPORATION
MRRYUTMA	MURRAY	QWEST CORPORATION
NEPHUTMA	NEPHI	QWEST CORPORATION
HNVIUTMA	OGDEN MAIN	QWEST CORPORATION
OGDNUTSO	OGDEN MAIN	QWEST CORPORATION
OGDNUTMA	OGDEN NORTH	QWEST CORPORATION
OGDNUTNO	OGDEN NORTH	QWEST CORPORATION
OGDNUTWE	OGDEN SOUTH	QWEST CORPORATION
OREMUTMA	OREM	QWEST CORPORATION
PRCYUTMA	PARK CITY	QWEST CORPORATION
PRWNUTMA	PAROWAN	QWEST CORPORATION
PYSNUTMA	PAYSON	QWEST CORPORATION
PLGVUTMA	PLEASANT GROVE	QWEST CORPORATION
PROVUTMA	PROVO	QWEST CORPORATION
RCFDUTMA	RICHFIELD	QWEST CORPORATION
RCMDUTMA	RICHMOND	QWEST CORPORATION
RVTNUTMA	RIVERTON	QWEST CORPORATION
SALNUTMA	SALINA	QWEST CORPORATION
SLKCUTEA	SALT LAKE EAST	QWEST CORPORATION
SLKCUTWE	SALT LAKE MAIN	QWEST CORPORATION
SLKCUTSO	SALT LAKE SOUTH	QWEST CORPORATION
SNTQUTMA	SANTAQUIN	QWEST CORPORATION
SMFDUTMA	SMITHFIELD	QWEST CORPORATION
SALMUTMA	SPANISH FORK	QWEST CORPORATION
SPFKUTMA	SPANISH FORK	QWEST CORPORATION
SPVLUTMA	SPRINGVILLE	QWEST CORPORATION
HRCNUTMA	ST GEORGE	QWEST CORPORATION
LEDSUTMA	ST GEORGE	QWEST CORPORATION
SPDLUTMA	ST GEORGE	QWEST CORPORATION
STGRUTMA	ST GEORGE	QWEST CORPORATION
VEYOUTMA	ST GEORGE	QWEST CORPORATION
TOOLUTMA	TOOELE	QWEST CORPORATION
DGWYUTMA	DUGWAY	SKYLINE TELECOM
EURKUTXC	EUREKA	SKYLINE TELECOM
GSHNUTXC	GOSHEN	SKYLINE TELECOM
ANTMUTXC	ANTIMONY	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
APVYUTXC	APPLE VLLY	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
BRYLUTAA	BERYL	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
BRCNUTXC	BRYCE CANYON	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
CAVLUTXC	CANNONVL	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION

CLLI	WIRE CENTERS	ILEC
ENTRUTXC	ENTERPRISE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
ESCLUTXC	ESCALANTE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
HATCUTXC	HATCH	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
KSHRUTAA	KOOSHAREM	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
MRVAUTXC	MARYSVALE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
MLFRUTXC	MILFORD	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
MNVIUTXC	MINERSVILLE	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
PNGTUTXC	PANGUITCH	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION
ALMTUTXC	ALTAMONT	UBTA-UBET COMMUNICATINS, INC.
DCHSUTMA	DUCHESNE	UBTA-UBET COMMUNICATINS, INC.
FTBTUTXC	FLATTOP BUTTE	UBTA-UBET COMMUNICATINS, INC.
FRLDUTXC	FRUITLAND	UBTA-UBET COMMUNICATINS, INC.
LAPNUTXC	LA POINT	UBTA-UBET COMMUNICATINS, INC.
NEOLUTXC	NEOLA	UBTA-UBET COMMUNICATINS, INC.
RNDTUTXC	RANDLETT	UBTA-UBET COMMUNICATINS, INC.
RSVTUTMA	ROOSEVELT	UBTA-UBET COMMUNICATINS, INC.
TABNUTXC	TABIONA	UBTA-UBET COMMUNICATINS, INC.
DTJHUTXC	DUTCH JOHN	UNION TELEPHONE CO. - WY
GNDLUTXC	GREENDALE	UNION TELEPHONE CO. - WY
MANLUTXC	MANILA	UNION TELEPHONE CO. - WY

EXHIBIT 3
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Federal Lifeline Assistance: Assurance Wireless is a federal Lifeline Assistance program brought to you by Virgin Mobile. Lifeline is a government benefit program supported by the federal Universal Service Fund.

Qualifications: Enrollment is available to individuals who qualify based on federal or state-specific eligibility criteria. You may qualify if you are on certain public assistance programs, like Medicaid or Supplemental Nutrition Assistance Program (SNAP). You can also qualify based on your household income.

Proof of Eligibility: You must provide proof of program participation or proof of income.

One Account per Household: The Lifeline Assistance program is available for only one wireless or wireline account per household. Separate households that live at the same address are eligible, including residents of homeless shelters and nursing homes. Residents with temporary addresses are also eligible.

Click [here](#) to listen to FCC Public Service Announcements about the federal Lifeline Assistance program and Recertification.

Offer limited to new eligible customers who are approved for Lifeline service (varies by state) residing in selected geographic areas and is non-transferable. Offers not available in all states/areas.

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Enrollment in this government benefit program is available to individuals who qualify based on federal or state-specific eligibility criteria. You may qualify for Assurance Wireless if you participate in any of the following government programs:

- Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
- Supplemental Security Income (SSI) (not the same as Social Security Benefits)
- Veterans Pension Benefit or Survivors Pension Benefit
- Medicaid (Medicare is not acceptable)
- Federal Public Housing Assistance (Section 8)

OR You may qualify based on household income. [Click here](#) for more information.

Docket No. 18-2521-02

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the filing was served by electronic mail the 16th day of March, 2018, on the following:

Utah Office of the Attorney General:

Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
Steven Snarr	stevensnarr@agutah.gov
Robert Moore	rmoore@agutah.gov

Division of Public Utilities:

Chris Parker	chrisparker@utah.gov
William Duncan	wduncan@utah.gov
Casey Coleman	ccoleman@utah.gov
Shauna Benvengnu-Springer	sbenvegn@utah.gov

Office of Consumer Services:

Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov

/s/ Sharon M. Bertelsen