

STATE OF MINNESOTA
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

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| Beverly Jones Heydinger | Chair |
| David C. Boyd | Commissioner |
| Nancy Lange | Commissioner |
| Dan Lipschultz | Commissioner |
| Betsy Wergin | Commissioner |

TracFone Wireless, Inc. for Designation as an
Eligible Telecommunications Carrier (ETC) for
the Limited Purpose of Offering Lifeline Service
to Qualified Households

Docket No. P-6823/M-09-802 &
Docket No. P-6823/M-10-519

REPLY COMMENTS OF OPEN ACCESS CONNECTIONS

IN RESPONSE TO: *In response to Comments of the Minnesota Department of Commerce regarding the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Offering Lifeline Service to Qualified Households and in the Matter of an Investigation into TracFone's Compliance with Remittance Responsibilities under Min. Stat §§ 403.11 and 237.52*

Introduction

Open Access Connections¹ has provided free voice mail services to more than 66,000 homeless and low-income Minnesotans since 1994. We are strong supporters of the Lifeline program, and many of our voice mail clients also receive Lifeline services. We have submitted numerous comments to the Public Utilities Commission (PUC) on pending Lifeline issues and have been following TracFone's Eligible Telecommunications Carrier (ETC) application for over four years. We are submitting the following reply comments regarding TracFone's latest request for designation as an ETC for the PUC's Consideration.

Comments

We are pleased that TracFone reached an agreement with the Department of Public Safety regarding their collection and remittance of Telecommunications Access Minnesota fees. We are also happy that TracFone is planning to offer free calls to emergency 911 and calls to customer service for their Lifeline customers, as we believe that these are essential services for low-income consumers.

TracFone's current Lifeline program includes a plan that offers 250 monthly minutes and 1,000 free text

¹ Open Access Connections previously submitted comments under the name Twin Cities Community Voice Mail. We formally changed our name to Open Access Connections in the fall of 2010.

messages. While Open Access Connections believes that 250 monthly minutes is insufficient to meet the everyday needs of many low-income consumers, TracFone's Lifeline offering is competitive with many other Lifeline providers.

Open Access Connections maintains that TracFone should be required to provide usable phones, phone replacement information, instruction manuals, prompt customer service, and accessible program information to their Lifeline customers. Once approved for ETC designation, Open Access Connections will regularly monitor TracFone's compliance of these issues, and will forward any concerns we have to the PUC.

Conclusion

Open Access Connections believes that approving TracFone's ETC application would be in the public's interest. An additional Lifeline provider will help bring more choices for low-income Minnesotans, as well as increased competitions among Lifeline providers. We request that the PUC expediently approve TracFone's Lifeline application.

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