

**STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

In the Matter of Annual Certifications Related
to Eligible Telecommunications Carriers' Use
of Federal Universal Service Support

MPUC Docket No. P-999/PR-18-08

**REPLY COMMENTS OF
VIRGIN MOBILE**

In its September 10, 2018 Comments (“Comments”), the Minnesota Department of Commerce (“Department”) recommends that in future years each eligible telecommunications carrier (“ETC”) should file an Affidavit and “Financial Summary.” Comments at 8-9 (Option C). Virgin Mobile USA, L.P. (“Virgin Mobile”) submits these Reply Comments to urge the Commission to clarify that these Affidavit and Financial Summary requirements should not apply to wireless carriers that are designated as ETCs for the limited purpose of qualifying for federal Universal Service Fund (“USF”) subsidies for serving customers in the Lifeline program.

I. BACKGROUND

Virgin Mobile, a wholly-owned indirect subsidiary of Sprint Corporation, is a facilities-based provider of commercial mobile radio service (“CMRS”) throughout the United States. Virgin Mobile provides Lifeline service in Minnesota under the trade name “Assurance Wireless.” On December 7, 2012, the Commission designated Virgin Mobile as an ETC for the limited purpose of qualifying for federal Universal Service Fund subsidies for serving customers enrolled in the federal Lifeline program.¹

¹ *In the Matter of the Petition of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier*, Docket No. P-6863/M-11-314, *Order Granting Limited ETC Designation* (rel. Dec. 7, 2012).

In order to receive federal high-cost USF, an ETC whose ETC designation was granted by a state regulatory commission must have its use of support annually certified by the state commission to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”). 47 C.F.R. § 54.314. High-cost ETCs use a form known as Form 481 to report compliance information to USAC, and to relevant state commissions as those states may require for purposes of this state certification process.² An ETC that receives only low-income USF (*i.e.*, a “Lifeline-only” ETC) must also annually report certain compliance information on the Form 481. 47 C.F.R. § 54.422. However, for a Lifeline-only ETC, there is no comparable requirement that the state certify the ETC’s use of support to USAC or the FCC. This is because unlike high-cost support, the purpose of Lifeline support is to reimburse ETCs for discounted service provided to qualifying low-income consumers. *See* 47 C.F.R. § 54.407.

The information required to be included in an ETC’s Form 481 varies widely depending on the ETC and the type of USF the ETC is eligible to receive. For example, price-cap ETCs receiving high-cost support must include in their Form 481s certain certifications related to their broadband obligations (47 C.F.R. § 54.313(d)), and privately-held rate-of-return ETCs must include detailed financial reports with their Form 481s (47 C.F.R. § 54.313(f)(2)). In contrast, the Form 481 of a state-designated Lifeline-only ETC such as Virgin Mobile need only include holding company and branding information (47 C.F.R. § 54.422(a)(1)) and the terms and conditions of the voice telephony service plans offered to its Lifeline subscribers (47 C.F.R. § 54.422(a)(2)).

Virgin Mobile’s 2018 Form 481, filed with the Commission in this docket on July 9, 2018, contains the information required by 47 C.F.R. § 54.422.

² *In the Matter of Connect America Fund*, WC Docket No. 10-90 and *In the Matter of ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Report and Order*, FCC 17-87 (rel. July 7, 2017) (“2017 ETC Order”) (removing some regulatory reporting obligations for high-cost ETCs, and removing the federal requirement that they file Form 481s with state commissions).

II. THE DEPARTMENT’S COMMENTS INCLUDE RECOMMENDATIONS FOR AN AFFIDAVIT AND A FINANCIAL SUMMARY

In the Options and Recommendation sections of its Comments, the Department recommends that “in the future, an officer of each company required to file a 481 with the FCC shall file an affidavit with the...Commission concurrently with the FCC 481 filing.” Comments at 8-9. The Department proposes that the Affidavit “confirm” five items:

- (a) the position of the affiant;
- (b) the affiant understands and is familiar with the requirements of the FCC concerning universal service funding;
- (c) the funds are and will be used appropriately;
- (d) the company is compliant with applicable rules on service quality and consumer protection;
- (e) there is sufficient backup to ensure functionality without an external power source and the company is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergencies.

Comments at 8-9.

The Department’s Comments further recommend that the Affidavit should include a “Financial Summary” showing:

- (a) the sources of federal USF receipts subject to certification;
- (b) an explanation of statewide distribution vs. study area code disbursement;
- (c) plant-specific operations expenses;
- (d) customer operations expenses;
- (e) corporate operations expenses;
- (f) total year supported expenses before return on investment;
- (g) additions;
- (h) 481 financial statement summarized information;
- (i) corporate expense to operating revenue information.

Comments at 9-10. These Financial Summary items are apparently intended to mirror information provided in this docket by certain state-regulated landline ETCs represented by Olson, Thielen, Ltd. Comments at 7. Apparently the Department anticipates that the proposed

Financial Summaries would be useful in helping it analyze whether these landline ETCs are making appropriate use of high-cost USF receipts. *Id.*

III. THE DEPARTMENT’S RECOMMENDATIONS SHOULD BE CLARIFIED: THEY SHOULD NOT APPLY TO LIFELINE-ONLY ETCs

The Department’s recommendations are not explained with sufficient precision. They should be clarified: the Affidavit and Financial Summary requirements should not apply to Lifeline-only ETCs.

The Comments provide very little detail about the Affidavit and especially about the Financial Summary. First and foremost, the Comments do not identify what type of ETCs to which the Affidavit and Financial Summary requirements are intended to apply. From the context of the Comments, it appears that the Affidavit and Financial Summary are intended only to apply to landline ETCs receiving high-cost support. If that was the intent, it should be made clear. Whatever the Department’s intent was, the Affidavit and Financial Summary requirements should not apply to Lifeline-only ETCs, for several reasons.

First, the Department’s Affidavit and Financial Summary recommendations relate to topics that are irrelevant to Lifeline-only ETCs’ receipt of USF. Lifeline-only ETCs do not receive USF for the purpose of investing in or maintaining telecommunications infrastructure. Rather, Lifeline USF is used only to reimburse the ETC for its provision of discounted Lifeline service. *See* 47 C.F.R. § 54.407. But the Department’s recommendations, especially the Financial Summary, have nothing to do with such reimbursement—rather, they relate solely to the use of funds to invest in or maintain telecommunications infrastructure. And, the items required in the Financial Summary are structured to relate to the System of Accounts used in regulation of wireline carriers; they have no correlation to wireless carriers’ non-regulated accounting systems.

Second, the Affidavit and Financial Summary recommendations unnecessarily go beyond the scope of states' and the FCC's regulation of wireless ETCs. The items to be addressed in the Affidavit would impose requirements that either never have been, or are no longer, considered by the FCC to be necessary for oversight of wireless ETCs' provision of Lifeline service. Specifically, the second and third items in the Affidavit relate to determining whether the ETC is using the support for the purposes for which it is intended. But state commission oversight of that issue only extends to high-cost ETCs. *See* 47 C.F.R. § 54.314(a) (requirement that states certify that ETCs are only using USF for purposes for which it is intended extends only to high-cost ETCs). The fourth item in the Affidavit corresponds to an FCC compliance requirement that that the FCC decided last year was no longer necessary. *See 2017 ETC Order* at ¶¶ 13-14 (describing how certification as to compliance with service quality standards and consumer protection rules is unnecessary, because the FCC and USAC have the authority to investigate violations of those standards and rules regardless of carriers' certifications). The fifth item in the Affidavit corresponds to an FCC requirement that exists for high-cost ETCs but is not applicable to state-designated Lifeline-only ETCs. *See* 47 C.F.R. §§ 54.313(a)(1). Similarly, the Financial Summary would require wireless Lifeline-only ETCs to provide detailed information about their finances and operations to the Commission. But the Commission's jurisdiction over the rates and finances of wireless carriers is preempted. *See* 47 U.S.C. § 332(c)(3)(A); *Cellco P'ship v. Hatch*, 431 F.3d 1077 (8th Cir. 2005) (describing Section 332 preemption).

Third, the Commission and Department already have ample measures in place to ensure a robust review of Lifeline-only ETCs' service and their use of USF. ETCs receiving Lifeline support are required to take steps to annually re-certify the eligibility of Lifeline subscribers and to report to the FCC, USAC, and state commissions regarding that re-certification process.

47 C.F.R. § 54.416(b).³ In addition, the Commission has separately imposed significant ongoing compliance requirements on Lifeline-only ETCs.⁴ And finally, the information provided by Lifeline-only ETCs on their current Form 481—especially the terms and conditions of Lifeline service as offered to customers—allows the Department and Commission to analyze whether that ETC’s involvement in the Lifeline program tracks with the federal requirements.

CONCLUSION

It is understandable that the Department’s Comments focus on requirements relating to how landline ETCs use high-cost USF, because reviewing that use of USF and certifying it to USAC and the FCC is the core function of this docket. But the Department’s recommendations are too broad and not very clear. To avoid uncertainty, the Commission’s decision in response to the Department’s Comments should include a clarification that the Affidavit and Financial Summary requirements set forth in the Comments are not applicable to wireless Lifeline-only ETCs.

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Dated: September 17, 2018

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³ For 2018, these re-certifications are addressed in Commission Docket No. P999/M-18-20.

⁴ See, e.g., *In the Matter of the Request by Virgin Mobile to Withdraw its Petition for Relinquishment of Eligible Telecommunications Carrier Designation*, Docket No. P6863/RL-16-738, *Order* (rel. June 7, 2017) (imposing detailed compliance requirements first developed for Sage Telecom).

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Annual Certification Related to Eligible
Telecommunications Carriers' (ETCs) use of
Federal Universal Service Support

MPUC Docket P999/PR-18-8

Certificate of Service

Patricia A. Kringen, certifies that on the 17th day of September, 2018, she e-filed a true and correct copy of Virgin Mobile USA, L.P.'s Reply Comments, by posting the document on www.edockets.state.mn.us. Said documents were also served via electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the U.S. Mail.

s/ Patricia A. Kringen

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