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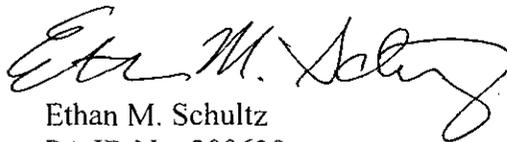
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Key Stone Building  
400 North Street  
Harrisburg, PA 17120

Dear Sir or Madam:

On behalf of Virgin Mobile USA, L.P., enclosed are an original and three (3) copies of a *Petition for Limited Designation as an Eligible Telecommunications Carrier in the State of Pennsylvania*. Please date-stamp the extra copy of this filing, and return it in the self-addressed, postage-prepaid envelope provided.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned at 202-371-7357.

Respectfully submitted,



Ethan M. Schultz  
PA ID No. 200638

*Counsel to Virgin Mobile USA, L.P.*

Enclosures

RECEIVED

JAN 29 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



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## SUMMARY

Virgin Mobile USA, L.P. (“Virgin Mobile” or the “Company”), a wholly owned subsidiary of Sprint Nextel Corporation (“Sprint Nextel”), is seeking designation as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Pennsylvania, pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (“Act”), for purposes of offering prepaid wireless services supported by the Universal Service Fund’s (“USF”) Lifeline program. As discussed herein, Virgin Mobile meets all of the necessary requirements for ETC designation under section 214(e)(1) of the Act to offer services supported by the Lifeline program. Designation of the Company would promote the public interest because it would provide qualifying Pennsylvania customers with lower prices and higher quality wireless services. *Many low-income customers in Pennsylvania have yet to benefit from the intensely competitive wireless market because of financial constraints, poor credit history or intermittent employment and many existing customers lose access to wireless services when their financial position deteriorates as a consequence of losing a job, a medical condition or any other adverse event—all unfortunately too common during a challenging economic period.* Virgin Mobile’s prepaid service offerings are ideally suited to provide these customers with reliable and free wireless services. As an ETC, Virgin Mobile would aggressively market its Lifeline services to these consumers—many of whom are among the intended beneficiaries of USF support.

**Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION FOR LIMITED DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

**I. INTRODUCTION**

Virgin Mobile USA, L.P. (“Virgin Mobile” or the “Company”), by undersigned counsel, and pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (“Act”), 47 U.S.C. § 214(e)(2), hereby petitions the Pennsylvania Public Utility Commission (“Commission”) for designation as an eligible telecommunications carrier (“ETC”) in the Commonwealth of Pennsylvania. Virgin Mobile seeks ETC designation in Pennsylvania only for purposes of participation in the Universal Service Fund’s (“USF”) Lifeline program. The instant request does not seek ETC designation to offer services supported by the federal high-cost program. As more fully described below, Virgin Mobile satisfies the requirements for designation as an ETC in the Commonwealth of Pennsylvania. Rapid grant of Virgin Mobile’s request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to lower-income Pennsylvania residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve the instant ETC designation petition.

## II. BACKGROUND

### A. Company Overview

Virgin Mobile was established as a joint venture between Sprint Nextel and Sir Richard Branson's Virgin Group to offer prepaid wireless services using the Virgin Mobile brand and the nationwide Sprint network.<sup>1</sup> The Company's innovative prepaid plans without annual contracts, along with its differentiated service offerings and high-quality customer service, have redefined the prepaid wireless marketplace and brought significant competition to the overall wireless market. Virgin Mobile's value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly buckets of minutes in advance. The Company also offers text and multimedia messaging and an array of mobile entertainment and information services, including music, games and graphics on all handsets.

Unlike many carriers, Virgin Mobile does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Many customers are from lower-income backgrounds and did not previously enjoy access to an attractive, comprehensive and high-quality wireless service because of financial constraints or poor credit history. Virgin Mobile estimates that approximately one-third of its present customers are new to wireless services and 35 percent have an annual household income below \$35,000. Many of these customers also use Virgin Mobile's services sparingly, with a substantial percentage spending less than \$10 per month. By marketing and expanding the availability of appealing wireless services to consumers

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<sup>1</sup> On November 24, 2009, Virgin Mobile became a wholly owned subsidiary of Sprint Nextel upon completion of the companies' previously announced transaction. The FCC approved Sprint Nextel's acquisition of Virgin Mobile effective September 11, 2009. See *International Authorizations Granted*, Public Notice, DA 09-2071 (rel. Sept. 17, 2009).

otherwise unable to afford them, and those previously ignored by traditional carriers, Virgin Mobile has effectively expanded access to wireless services. Unfortunately, during this challenging economic period, many existing customers have to forgo access to wireless services entirely when their financial position deteriorates, making it more difficult for prospective employers and dependent family members to reach them and losing wireless access to emergency services.

#### B. Previous ETC Designations

The Federal Communications Commission (“FCC”) previously designated Virgin Mobile as an ETC for purposes of offering Lifeline services in the states of New York, North Carolina, Tennessee and Virginia.<sup>2</sup> In approving the Company’s requests, the FCC determined that Virgin Mobile would “offer Lifeline-eligible consumers a choice of providers for accessing telecommunications services not available to such consumers today” and “expand participation of qualifying consumers” in the Lifeline program—a longstanding goal.<sup>3</sup> In light of these significant benefits, the FCC concluded that limited designation of Virgin Mobile as an ETC was in the public interest.<sup>4</sup>

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<sup>2</sup> See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, FCC 09-18 (rel. March 5, 2009) (“Order”). As the Pennsylvania Public Utility Commission asserted jurisdiction over the wireless ETC designations during the pendency of Virgin Mobile’s application to the FCC, the FCC dismissed without prejudice the Petition relative to Pennsylvania. *Id.* Virgin Mobile has also been designated an ETC in the State of Michigan. See *In the Matter of the Application of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Telecommunications Act of 1996*, Case No. U-15966, Opinion and Order (Dec. 1, 2009).

<sup>3</sup> Order at ¶¶ 21, 30.

<sup>4</sup> See Order at ¶ 29.

At that time, Virgin Mobile operated as a mobile virtual network operator that did not own any network facilities, so the *Order* granted the Company's request for forbearance from enforcement from the section 214(e)(1)(A) facilities-based requirement for ETC designation. The FCC conditioned its grant of forbearance, as well as its grant of ETC designation, on Virgin Mobile's compliance with certain requirements aimed at enhancing Lifeline customers' access to public safety services and preventing misuse of the Company's Lifeline offering.<sup>5</sup> These conditions included the following: (a) providing Lifeline customers with 911 and enhanced 911 ("E911") access immediately upon commencement of service and regardless of activation status or the availability of prepaid minutes; (b) offering E911-compliant handsets to new Lifeline customers upon activation of service and replacing any non-compliant handsets, at no additional charge, for existing customers who obtain Lifeline service; (c) obtaining a certification from each Public Safety Answering Point ("PSAP") whose territory overlaps with Virgin Mobile's Lifeline service area, confirming that the Company provides its customers with 911 and E911 service or if, within 90 days of a request for certification, a PSAP has neither provided the certification nor affirmatively determined that Virgin Mobile does not provide its customers with access to 911 and E911, self-certifying that Virgin Mobile meets the 911 and E911 requirements; (d) requiring customers to self-certify under penalty of perjury upon service activation and annually thereafter that they are the head of their household and receive Lifeline-supported service only from Virgin Mobile; and, (e) establishing applicable safeguards to prevent its customers from activating multiple Lifeline accounts, including tracking each Lifeline customer's primary residential

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<sup>5</sup> It is worth noting that Virgin Mobile has remitted E911 monthly fees in Pennsylvania since enactment of legislation in 2004 that specifically extended E911 fees to prepaid wireless services.

address.<sup>6</sup> The FCC recently approved the Company's plan describing the measures it would undertake to implement each of these conditions for the first four states in which it received ETC designation.<sup>7</sup>

C. The Commission Has the Authority to Perform ETC Designations

The Commission has the requisite authority to perform the limited ETC designation requested herein. Section 214(e)(2) of the Communications Act provides state public utility commissions with the "primary responsibility" for the designation of ETCs.<sup>8</sup> Pursuant to this authority, the Commission has participated in determining whether to grant ETC status to an applying carrier.<sup>9</sup> While the Commission did not historically review ETC requests from wireless carriers, it recently stated that it would exercise jurisdiction over ETC designation requests of wireless carriers pursuant to section 214(e)(2) of the Act.<sup>10</sup> Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of section 214(e)(1). By offering all of the services supported by the federal USF and advertising the availability of such services, Virgin Mobile currently meets all of the requirements of section 214 of the Act, warranting its designation as an ETC by the Commission.

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<sup>6</sup> See Order at ¶ 12.

<sup>7</sup> See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, DA 09-2344 (rel. Oct. 29, 2009).

<sup>8</sup> 47 U.S.C. § 214(e)(2).

<sup>9</sup> See e.g., *Petition of D&E Systems, Inc. for Designation as an Eligible Telecommunications Carrier for the Purposes of Receiving Universal Service Support*, Order, Docket No. P-00052191 (April 20, 2006).

<sup>10</sup> See *In re: Commission Exercise of Jurisdiction to Designate Wireless Carriers as an Eligible Telecommunications Carrier (ETC) Pursuant to 47 U.S.C. § 214(e)(2) of the Telecommunications Act of 1996*, Notice, Docket No. M-00960799 (Feb. 26, 2009).

III. VIRGIN MOBILE REQUESTS ETC DESIGNATION IN ITS PENNSYLVANIA SERVICE AREA FOR PARTICIPATION IN THE LIFELINE PROGRAM

A. Virgin Mobile Requests Statewide ETC Designation

As a non-rural carrier, Virgin Mobile is required to describe the areas within which it requests ETC designation. The Company requests ETC designation for its entire service area in Pennsylvania.<sup>11</sup> Virgin Mobile understands that its service area overlaps with many rural carriers in Pennsylvania, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it only seeks ETC designation for purposes of participating in the Lifeline program. Virgin Mobile's authorized service area covers the service territories of the following non-rural telephone companies:

Frontier Communications of Pennsylvania, LLC  
Verizon Pennsylvania, Inc.  
Verizon North, Inc.

Virgin Mobile's authorized service area covers the service territories of the following rural telephone companies:

Alltel Pennsylvania, Inc.  
Armstrong Telephone Company – PA  
Armstrong Telephone Company-North  
Bentleyville Telephone Company  
Buffalo Valley Telephone Company  
Citizens Telephone Company of Kecksburg  
Citizens Telephone Company of New York  
Commonwealth Telephone Company  
Conestoga Telephone and Telegraph Company  
Denver and Ephrata Telephone and Telegraph Company  
Deposit Telephone Company  
CenturyLink f/k/a EMBARQ  
Frontier Communications of Breezewood, LLC  
Frontier Communications of Canton, LLC  
Frontier Communications of Lakewood, LLC  
Frontier Communications of Oswayo River, LLC

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<sup>11</sup> A list of the wire centers for which Virgin Mobile requests ETC designation is attached hereto as Exhibit 2.

Hancock Telephone Company  
Hickory Telephone Company  
Ironton Telephone Company  
Lackawaxen Telecommunications Services, Inc.  
Laurel Highland Telephone Company  
Marianna & Scenery Hill Telephone Company  
Mahanoy & Mahantango Telephone Co.  
North-Eastern Pennsylvania Telephone Company  
North Penn Telephone Company  
North Pittsburgh Telephone Company  
Palmerton Telephone Company  
Pennsylvania Telephone Company  
Pymatuning Independent Telephone Company  
South Canaan Telephone Company  
Sugar Valley Telephone Company  
Venus Telephone Corporation  
West Side Telephone Company  
Windstream Pennsylvania, Inc  
Yukon-Waltz Telephone Company.

B. Virgin Mobile Requests ETC Designation for Participation in the Lifeline Program

Virgin Mobile requests ETC designation in Pennsylvania for the sole purpose of participating in the Lifeline program as a prepaid wireless carrier. Virgin Mobile will not seek to provide services supported by the USF's high-cost program. As more fully described below, the instant request to participate in the Lifeline program promotes the goals of universal service and offers many benefits to low-income customers in the Commonwealth of Pennsylvania. The Lifeline services provided by Virgin Mobile will contain many features specifically designed for qualifying customers. Indeed, Virgin Mobile's Lifeline plans will provide affordable and convenient wireless services to qualifying Pennsylvania customers, many of whom are otherwise unable to afford wireless services.

C. Description of Prepaid Lifeline Offering

Virgin Mobile has branded its prepaid Lifeline service “Assurance Wireless Brought To You By Virgin Mobile.” The service will provide customers with the same features and functionalities enjoyed by all other Virgin Mobile prepaid customers, with one notable exception: prepaid Lifeline services will be free of charge. Under the current plan, eligible customers will receive 200 anytime prepaid minutes per month at no charge with additional service priced at \$0.20/minute and \$0.10/text message.<sup>12</sup> In addition to free voice services, prepaid Lifeline customers also will have access to a variety of other standard features at no additional charge, including voice mail, caller I.D. and call waiting services. New customers may elect to receive a free Assurance Wireless-branded handset with E911 functionality. Current Virgin Mobile customers will be able to use their existing handsets to receive prepaid Lifeline services, or may elect to receive a free Assurance Wireless handset.

D. Applicability of Forbearance Conditions

As noted above, the FCC’s *Order* granting Virgin Mobile forbearance from the section 214(e)(1)(A) requirements imposed certain conditions on the Company. Included among these conditions was a requirement that the Company obtain a certification from each PSAP whose territory overlaps with Virgin Mobile’s service area, confirming that the Company provides its customers with 911 and E911 service or if, within 90 days of a request for certification, a PSAP has neither provided the certification nor affirmatively determined that Virgin Mobile does not provide its customers with access to 911 and E911, self-certify that it meets the 911 and E911

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<sup>12</sup> Virgin Mobile expects that the Company’s Lifeline plan may change as the wireless market evolves. As such, the Company requests that the Commission’s grant of ETC designation provide it with the requisite authority to modify the parameters of the offering as marketplace conditions develop.

requirements. This condition generally arose from the Company's status as a non-facilities-based provider of wireless services. Virgin Mobile appreciates the FCC's desire to ensure that Lifeline customers of wireless resellers have meaningful access to emergency services. As the FCC has noted, the provision of 911 and E911 services is critical to the ability of emergency services personnel to promptly respond to a host of crises.<sup>13</sup> For these reasons, Virgin Mobile voluntarily committed to complying with this condition for the initial four states in which it received ETC authority from the FCC, and the Company has complied with the condition upon commencement of Lifeline services in these states.

In light of the recent acquisition by Sprint Nextel, Virgin Mobile respectfully submits that the foregoing condition regarding PSAP certification is inapplicable to the instant request of Virgin Mobile as a facilities-based provider. Virgin Mobile is unaware of any prior ETC designation involving a facilities-based wireless provider in which the FCC or the Commission has imposed a similar condition. The FCC itself noted in its *Order* that the conditions related to emergency services, including the PSAP certification requirement, applied only to wireless resellers.<sup>14</sup> Applicability of this condition to a facilities-based wireless provider would hinder the broader deployment of Lifeline services—without any attendant benefits for consumers. Indeed, by adding an unnecessary and burdensome requirement, the condition would serve only to harm customers by increasing the costs and delays associated with the deployment of wireless Lifeline services. Complying with this condition in the states where Virgin Mobile has launched Lifeline service has imposed significant cost on the Company, forcing it to redirect financial

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<sup>13</sup> See *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. §214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, Order, 20 FCC Rcd 15095, 15099 (2005).

<sup>14</sup> See *Order* at ¶¶ 22, 27.

resources that otherwise would have been used to develop and market its Lifeline services.

Accordingly, Virgin Mobile respectfully submits that application of the prior condition related to PSAP certification to the instant request would harm the public interest.

#### IV. VIRGIN MOBILE SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 214(e)(1) of the Act and section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by the USF, either using their own facilities or a combination of their own facilities and the resale of another carrier's services. Applicants must also commit to advertise the availability and rates of such services.<sup>15</sup> As detailed below, Virgin Mobile satisfies each of the above-listed requirements.

##### A. Virgin Mobile Is a Common Carrier

Section 153(10) of the Act defines a common carrier as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio ..."<sup>16</sup> The FCC has determined on numerous occasions that providers of mobile wireless services shall be treated as common carriers for regulatory purposes. As a provider of wireless telecommunications services, therefore, Virgin Mobile is a common carrier eligible for designation as an ETC.

##### B. Virgin Mobile Will Provide the Supported Services

As described above, Virgin Mobile is a wholly owned subsidiary of Sprint Nextel. Accordingly, Virgin Mobile is capable of, and currently provides, the supported services over an existing network infrastructure in Pennsylvania. Virgin Mobile's request for ETC designation

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<sup>15</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d).

<sup>16</sup> 47 U.S.C. § 153(10).

complies with section 214(e)(1) of the Act because it provides all of the services and functionalities supported by the universal service program as set forth in section 54.101 of the FCC's regulations throughout its service territory in the Commonwealth of Pennsylvania. The Company, moreover, will make these services and functionalities available to any qualifying Pennsylvania customer in the Company's service area.

1. Voice Grade Access to the Public Switched Telephone Network

Virgin Mobile provides voice grade access to the public switched telephone network ("PSTN") and offers its customers services at bandwidth rates between 300 and 3,000 MHz as required by the FCC's regulations.<sup>17</sup>

2. Local Usage

As part of the voice grade access to the PSTN, an ETC must provide local calling services to its customers. The FCC's regulations do not require ETCs to offer a specific amount of local usage or mandate that ETCs provide a minimum number of free local calls or minutes. Instead, an applicant for ETC designation must demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.<sup>18</sup> In analyzing whether an ETC applicant's plan is comparable to the underlying ILEC's, the FCC reviews all aspects of the plan on a case-by-case basis, including the nature of the supported service, the size of the local calling area, the inclusion of additional services (e.g., caller I.D., etc.) and the

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<sup>17</sup> See 47 U.S.C. § 54.101(a)(1).

<sup>18</sup> 47 C.F.R. § 54.202(a)(4).

amount of local usage.<sup>19</sup> The FCC has determined that a carrier satisfies the local usage requirements when it offers customers rate plans containing varying amounts of local usage.<sup>20</sup>

Virgin Mobile's proposed Lifeline offering fully complies with the local usage requirements established by the FCC. Not only will Virgin Mobile's offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. Contrary to the ILECs' plans, Virgin Mobile will offer customers a certain amount of service free of charge. As discussed above, Virgin Mobile will provide its Lifeline customers with approximately 200 anytime minutes per month at no charge. Contrary to the ILEC plans, which contain relatively small local calling areas, Virgin Mobile customers can use these free minutes to place calls statewide (or even nationwide) because Virgin Mobile does not constrict customers' use by imposing a local calling area requirement. In addition to free voice services, Virgin Mobile will provide Lifeline customers with access to a variety of other features at no cost, including voice mail, caller I.D., call waiting services and enhanced 911 ("E911") capabilities. Most important, Virgin Mobile's Lifeline service will provide low-income Pennsylvania residents with the convenience and security offered by wireless services without interruption—even if their financial position deteriorates.

### 3. DTMF Signaling or its Functional Equivalent

Virgin Mobile provides dual tone multi-frequency ("DTMF") signaling to expedite the transmission of call set up and call detail information throughout its network. All wireless handsets offered for sale by the Company are DTMF-capable.

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<sup>19</sup> See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385 (2005).

<sup>20</sup> See e.g., *Farmers Cellular, Inc.*, 18 FCC Rcd 3848, 3852 (2003); *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc.*, 17 FCC Rcd 9589, 9593 (2002); *Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, 16 FCC Rcd 48, 52 (2000).

4. Single-Party Service or its Functional Equivalent

“Single-party service” means that only one party will be served by a subscriber loop or access line during a telephone transmission. Virgin Mobile provides the functional equivalent of single-party service to its wireless customers for the duration of each telephone call, and does not provide multi-party (or “party-line”) services.

5. Access to Emergency Services

Virgin Mobile provides nationwide access to 911 emergency services for all of its customers. Virgin Mobile also complies with the FCC’s regulations governing the deployment and availability of E911 compatible handsets.

6. Access to Operator Services

Virgin Mobile provides all of its customers with access to operator services.

7. Access to Interexchange Services

Virgin Mobile’s service provides its customers with the ability to make interexchange, or long distance, telephone calls. Domestic long distance capabilities are included in Virgin Mobile’s service with no additional charges because minutes for local and domestic long distance services are not billed separately at different rates.

8. Access to Directory Assistance

All Virgin Mobile customers are able to dial “411” to reach directory assistance services from their wireless handsets.

9. Toll Limitation

Toll limitation allows customers to either block the completion of outgoing long distance calls or specify a certain amount of toll usage to prevent them from incurring significant long

distance charges and risking disconnection. As described above, Virgin Mobile provides its wireless service on a prepaid, or pay-as-you-go, basis. Virgin Mobile's service, moreover, is not offered on a distance-sensitive basis and minutes are not charged separately for local or domestic long distance services. Customers also must specifically authorize access for international services, for which additional charges may apply. The FCC determined in its previous grant of ETC designation that the nature of Virgin Mobile's service mitigates concerns that low-income customers will incur significant charges for long distance calls, risking disconnection of their service.<sup>21</sup>

### C. Functionality in Emergency Situations

As a wholly owned subsidiary of Sprint Nextel, Virgin Mobile is able to remain functional in emergency situations as required by section 54.202(a)(2) of the FCC's regulations.<sup>22</sup> Sprint Nextel has established a variety of internal programs, policies and teams dedicated to analyzing, assessing and responding to emergency situations. These programs, policies and teams ensure the timely and effective deployment of Sprint Nextel's products and services to allow the public and private sectors to function in emergency situations. Indeed, Sprint's network is monitored 24 hours a day, 7 days a week, 365 days a year by its network monitoring centers. Local switching offices staffed by trained technicians and management coordinate with these larger operation centers, to ensure that Sprint's networks are properly maintained and network performance is at expected levels.

In addition, Sprint has reasonable amounts of back-up power to ensure functionality without an external power source, and has implemented reasonable practices to reroute traffic

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<sup>21</sup> See *Order* at ¶ 34.

<sup>22</sup> See 47 C.F.R. § 54.202(a)(2).

around damaged facilities and manage traffic spikes resulting from emergency situations. Each cell site in the Sprint network is equipped with battery back-up power. The company also is capable of rerouting traffic around damaged facilities. Many cell sites in the Sprint network provide overlapping coverage for neighboring areas, and such design redundancy ensures that coverage continues in the event of damage to a particular facility. In the event of a major failure of a cell site, neighboring sites could be adjusted to provide coverage to a wider service area. These practices significantly reduce the chance that emergencies, fiber cuts or equipment failure will result in a loss of service.

D. Advertising of Supported Services

Virgin Mobile will advertise the availability and rates for the services described above using media of general distribution as required by the FCC's regulations.<sup>23</sup> The Company advertises the availability of its services through newspapers, magazines, radio, the Internet billboards and television. Virgin Mobile's third-party retail partners also heavily promote its services. These advertising campaigns have been highly effective in reaching low-income customers and promoting the availability of cost-effective wireless services to this consumer segment.

Virgin Mobile will supplement these methods of communication to specifically advertise and promote the availability of its Lifeline offerings to qualifying customers throughout the Commonwealth of Pennsylvania. Virgin Mobile intends to distribute brochures and posters at various Commonwealth and local social service agencies to inform customers of the availability of its Lifeline services. In addition, Virgin Mobile may market its Lifeline services through its RE\*Generation pro-social initiative, which is a program that connects at-risk youth with young

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<sup>23</sup> See 47 C.F.R. § 54.201.

people who want to make a difference through partnerships with innovative not-for-profit organizations. The Company also will heavily promote these offerings to its existing customers—many of whom may otherwise qualify for Lifeline—through email and text messages.

V. DESIGNATION OF VIRGIN MOBILE AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.<sup>24</sup> There is no question that designation of Virgin Mobile as an ETC in Pennsylvania will further the public interest by providing Pennsylvania consumers, especially low-income consumers, with lower prices and higher quality services, which a study found to be a vital economic resource for low-income consumers that leads to improved wage levels and personal safety.<sup>25</sup> Many lower-income customers in Pennsylvania have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers. Chairman Cawley, himself, has acknowledged the limited number of wireline and wireless ETCs offering a Lifeline product within Pennsylvania.<sup>26</sup> Designating Virgin Mobile as an ETC in Pennsylvania, therefore, will enable it to expand the availability of affordable telecommunications services to qualifying Pennsylvania consumers, leading to lower prices and increased choice.

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<sup>24</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

<sup>25</sup> See Sullivan, “A Review of Literature and Data from Two New Surveys,” April 2008.

<sup>26</sup> See *Petition of Verizon Pennsylvania, Inc. for Modification of Consent Order*, Final Order, Docket No. C-00881727 (June 21, 2009) (Cawley, J., concurring in part and dissenting in part).

The instant request for ETC designation must be examined in light of the Act's goals of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—especially low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Virgin Mobile as an ETC would benefit Pennsylvania consumers, especially its many low-income consumers eligible for Lifeline services. The Company's participation in the Lifeline program also undoubtedly would increase opportunities for it to serve Pennsylvania customers with appealing and affordable service offerings.

Designation of Virgin Mobile as an ETC would also promote competition and increase the pressure on other carriers to target low-income consumers with service offerings tailored to *their needs, greatly benefiting this much ignored consumer segment*. Virgin Mobile will bring the same entrepreneurial spirit that has reinvigorated the wireless industry to the Pennsylvania Lifeline market, helping to redefine the wireless experience for many low-income consumers in the Commonwealth. Other carriers, therefore, will have the incentive to improve their existing service offerings and tailor service plans to contain service terms and features appealing to lower-income customers.

Virgin Mobile's Lifeline customers will receive the same high-quality wireless services provided to all Company customers. Virgin Mobile has emphasized customer service as an essential pillar for its marketplace success since service launch. Indeed, the Company's success is testament to the principle that wireless carriers can provide lower-income customers with the same features, functionalities and services demanded by higher-income consumers. This intense focus on customer service has been rewarded and customers have responded accordingly. Over 90 percent of Virgin Mobile's customers indicate that they would recommend the service to a

friend, while nearly 80 percent already have done so. As evidence of its commitment to high-quality service, Virgin Mobile has complied with the CTIA-The Wireless Association® Consumer Code for Wireless Service (“Consumer Code”) since its inception and will continue to comply with the Consumer Code once designated as an ETC.<sup>27</sup> Virgin Mobile annually certifies its compliance with the Consumer Code, and the FCC has recognized the value of such compliance.<sup>28</sup> In prior years, the Company has also received numerous awards for its high-quality customer service, including the prestigious J.D. Power award for providing “An Outstanding Customer Service Experience” under its Certified Call Center Program.

While Virgin Mobile has experienced success in deploying wireless services to low-income consumers, internal Company analysis suggests that many low-income customers still intermittently discontinue service because of economic constraints. ETC designation in Pennsylvania would enable Virgin Mobile to offer appealing and affordable service offerings to low-income Pennsylvania customers to ensure that they are able to afford wireless services on a consistent and uninterrupted basis. Without question, prepaid wireless services have become essential for lower-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents.<sup>29</sup> Providing Virgin Mobile with the authority

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<sup>27</sup> Virgin Mobile’s compliance with the Consumer Code also satisfies its obligations under the FCC’s regulations. See 47 C.F.R. § 54.202(a)(3).

<sup>28</sup> See *Federal-State Joint Board on Universal Service Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1576-77, wherein the FCC endorsed the Consumer Code by considering adherence to the Consumer Code as a factor in the demonstration of a wireless carrier’s qualifications to be an eligible telecommunications carrier.

<sup>29</sup> Indeed, a recent aggregate survey of Virgin Mobile customer usage patterns indicated that state and city welfare agencies are among the most frequently contacted by customers.

necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

VI. ANTI-DRUG ABUSE CERTIFICATION

Virgin Mobile certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

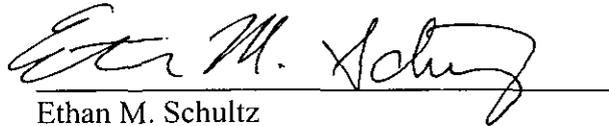
VII. CONCLUSION

As discussed above, designation of Virgin Mobile as an ETC in the Commonwealth of Pennsylvania accords with the requirements of section 103-690 of the Commission's regulations and section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, for all of the foregoing reasons, Virgin Mobile respectfully requests that the Commission designate Virgin Mobile as an ETC in the Commonwealth of Pennsylvania solely for purposes of participating in the Lifeline program.

Respectfully submitted,

VIRGIN MOBILE USA, L.P.



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Warren, NJ 07059  
Tel: 908-607-4017

January 29, 2010

**EXHIBIT 1**  
**CERTIFICATION**

**Declaration of Virgin Mobile USA, L.P.**

I, Peter Lurie, do hereby declare under penalty of perjury as follows:

1. I am the Senior Vice President of Virgin Mobile USA, L.P., a Delaware Limited Partnership with its principal place of business at 10 Independence Blvd, Warren, NJ 07059.

2. I have read Virgin Mobile's Petition for Limited Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania 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 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.



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Peter Lurie  
Senior Vice President

**EXHIBIT 2**  
**WIRE CENTERS**

CLLI	WIRE CENTER NAME
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CRRYPAXC	CORRY
FRERPAXF	FAIRVIEW
MCKNPAXM	MCKEAN
CNLKPAXC	CONNEAUT LAKE
ERIEPAXS	ERIE
EDNBPAXE	EDINBORO
ERIEPAXE	ERIE
ERIEPAXM	FRANKLIN
ERIEPAXW	ERIE
GRRDPAXG	GIRARD
NRTEPAXN	NORTH EAST
ALBNPAXA	ALBION
SAEGPAXS	SAEGERTOWN
SHRNPASH	SHARON
WSPFPAXW	WEST SPRINGFIELD
WTFRPAXW	WATERFORD
UNCYPAXU	UNION CITY
MDVLPAXM	MEADVILLE
CLIFPAXC	CLIFFORD
HAFDPAXH	HARFORD
BDVYPAXB	BEDFORD VALLEY
SCBGPAXS	SCHELLSBURG
TYRNPATY	TYRONE
WRMRPAXW	WARRIORS MARK
LWTWPALE	LEWISTOWN
BDFRPAXB	BEDFORD
CLVLPAXC	CHARLESVILLE
CYBGPAXC	CLAYSBURG
EVRTPAXE	EVERETT
FSTWPAXF	FISHERTOWN
MRBGPAXM	MARTINSBURG
OSBGPAXO	OSTERBURG
HLBGPAHO	HOLLIDAYSBURG
ALNAPAAL	ALTOONA
BLWDPABE	BELLWOOD
RRSPAXR	ROARING SPRING
MCBGPAXM	MCCONNELLSBURG
MRCBPAXM	MERCERSBURG
BZWDPAXB	BREEZEWOOD
STTMPAXS	SAINT THOMAS
GNCSPAXG	GREENCASTLE
MARNPAXM	MARION
NWBGPAXN	NEWBURG

**CLLI****WIRE CENTER NAME**

SHIPPAXS	SHIPPENSBURG
WYBOPAXW	WAYNESBORO
FYVLPAXF	FAYETTEVILLE
BIGVPAXB	BIGLERVILLE
CHBGPAXC	CHAMBERSBURG
CRLSPAXC	CARLISLE
DYRNPAXD	DRY RUN
MHSPPAXM	MOUNT HOLLY SPRINGS
NVLCPAXN	NEWVILLE
ICBGPAXI	ICKESBURG
LYSVPAXL	LOYSVILLE
MLTWPAXM	MILLERSTOWN
NWPTPAXN	NEWPORT
PTRYPAXP	PORT ROYAL
BLRSPAXB	BLUE RIDGE SUMMIT
FRFDPAXF	FAIRFIELD
GTBGPAXG	GETTYSBURG
DLBGPAXD	DILLSBURG
DOVRPAXD	DOVER
EBRLPAXE	EAST BERLIN
HNVRPAXH	HANOVER
LTTWPAXL	LITTLESTOWN
LWBYPAXL	LEWISBERRY
MBRGPAME	MECHANICSBURG
NCLDPANC	HARRISBURG ZONE 1
NWOXPAXN	NEW OXFORD
YRSPPAXY	YORK SPRINGS
MYVIPAXM	MARYSVILLE
DNCNPAXD	DUNCANNON
CPHLPACH	HARRISBURG ZONE 1
DAPHPADA	DAUPHIN
ENOLPAEN	HARRISBURG ZONE 1
HLFXPAHX	HALIFAX
HRBGPAHA	ROBESONIA
MCLVPAXM	MCALISTERVILLE
RDVLPAXR	REEDSVILLE
LVRPPAXL	LIVERPOOL
TMTWPAXT	THOMPSONTOWN
MLBGPAXM	MILLERSBURG
GRTZPAXG	GRATZ
LYKNPAXL	LYKENS
MDTNPAMI	MIDDLETOWN
GLRKPAXG	GLEN ROCK
MNCHPAXM	MANCHESTER

<u>CLLI</u>	<u>WIRE CENTER NAME</u>
SPGVPAXS	JEFFERSON (YORK CO)
YORKPAXM	YORK
YORKPAXN	YORK
YORKPAXS	LOGANVILLE
YORKPAXW	YORK
ANVLPAAN	ANNVILLE
HRSHPAXH	HERSHEY1
HUMLPAHM	HUMMELSTOWN
MTGRPAMG	MOUNT GRETNA
PLMYPAPA	PALMYRA
PXTGPAPG	HARRISBURG ZONE 1
PXTNPAPA	HARRISBURG ZONE 1
SLTNPAST	HARRISBURG ZONE 2
WGVLPAXW	WRIGHTSVILLE
BROGPAXB	BROGUE
RDLNPAXR	RED LION
SWTWPAXS	STEWARTSTOWN
YORKPAXE	YORK
FWGVPAXF	FAWN GROVE
JNTWPAXJ	JONESTOWN
LBNNPAES	LEBANON
METWPAXM	MYERSTOWN
SCTWPAXS	SCHAEFFERSTOWN
RSSLPARU	RUSSELL
RMNHPARX	BELVIDERE
KMTNPAXK	KEMPTON
NWSMPAXN	NEW SMITHVILLE
NWTRPAXN	NEW TRIPOLI
IRTNPAXI	IRONTON
NATNPANR	NORTHAMPTON
SLTTPAES	SLATINGTON
CLMAPAXC	COLUMBIA
EZTWPAXE	ELIZABETHTOWN
MANHPAXE	MANHEIM
MRTTPAXM	MARIETTA
MTJYPAXM	MOUNT JOY
DELTPAXD	DELTA
FYTPAXF	FRYSTOWN
AKRNPAXA	AKRON
DNVRPAXD	DENVER
EPBGPAEP	LANCASTER
EPHRPAXE	EPHRATA
LDVLPAES	LANDISVILLE
LITZPAXE	ROBESONIA

**CLLI****WIRE CENTER NAME**

WMLSPAXW	WOMELSDORF
LEOLPAXL	LEOLA
MTVLPAXM	MOUNTVILLE
HNSLPAXH	HENSEL
ARVLPAXA	AIRVILLE
LNCSPALA	LANCASTER
QRVLPAXQ	QUARRYVILLE
RWVLPAXR	RAWLINSVILLE
STBGPAES	STRASBURG
WLSTPAWS	LANCASTER
INTRPAXI	INTERCOURSE
GAP PAXG	GAP
KRWDPAKX	KIRKWOOD
OXFRPAOX	OXFORD
ADTWPAXA	ADAMSTOWN
GNHLPAXG	GREEN HILLS
HYBKPAHB	HONEY BROOK
RDNGPARE	READING
ROBSPAXR	ROBESONIA
SHLNPASH	READING
SLWBPASL	READING
SNSPPASS	READING
NHLDPAXN	NEW HOLLAND
TRHLPAXT	TERRE HILL
KMVLPAKV	KEMBLESVILLE
BERVPAXB	BERNVILLE
FLWDPAFL	FLEETWOOD
HMBGPAHB	HAMBURG
KHVLPAKU	ALLENTOWN
KZTNPAKZ	KUTZTOWN
LRDLPALB	READING
LSPTPAXL	LEESPORT
OLEYPAXO	OLEY
MNDNPAMH	MENDENHALL
CTVLPACV	COATESVILLE
KNSQPAKS	UNIONVILLE
LDNBPALB	LANDENBERG
PRBGPAPB	PARKESBURG
WCHSPAWC	WEST CHESTER
WGRVPAWG	WEST GROVE
SNVLPAXS	SASSAMANSVILLE
BRDSPAXB	FLEETWOOD
GLNMPAGL	GLENMOORE
MGTWPAXM	MORGANTOWN,PA

**CELL****WIRE CENTER NAME**

PGTWPAPT	PUGHTOWN
PRFDPAPF	ROYERSFORD
PTTWPAPT	POTTSTOWN
RYFRPARF	ROYERSFORD
YLHSPAXY	YELLOW HOUSE
LARCPALM	BROOMALL-NEWTOWN SQUARE
AVDLPAAV	AVONDALE
CHESPACB	CHESTER,PA
CHTTFACT	CHESTER HEIGHTS
DWTWPADT	DOWNINGTOWN
MEDIPAME	MEDIA
PAOLPAPA	PAOLI-MALVERN-BERWYN
BOTWPAXB	READING
BLLYPAXB	BALLY
ALTWPAAL	ALLENTOWN
EMMSPAXE	EMMAUS
PNBGPAPB	PENNSBURG
CGVLPACL	COLLEGEVILLE
CSSPPACS	CHESTER SPRINGS
DGVLPAXD	DOUGLASSVILLE
EAGLPAEG	EAGLE
EXTNPAEX	EXTON
KGPRPAKP	NORRISTOWN
PXVLPAPV	PHOENIXVILLE
SCHWPASV	SCHWENKSVILLE
TRPRPATR	NORRISTOWN
WAYNPAWY	WAYNE,PA
PRKSPAPE	PERKASIE
ALTWPAMT	ALLENTOWN
BHLHPABE	BETHLEHEM
CPBGPAXC	COOPERSBURG
CTSQPACT	CATASAUQUA
GRLAPAGL	GREEN LANE
HLTWPAHE	HELLERTOWN
HRLVPAHV	HARLEYSVILLE
QKTWPAQT	QUAKERTOWN
SDTNPASD	SOUDERTON
SPTWPASP	SPRINGTOWN
CHESPACA	CHESTER,PA
GLLDPAGN	DARBY-RIDLEYPK-SHARN HL
KRLNPAKL	HAVERTOWN-MANOA
LNSDPALD	UPPER DARBY
RDPKPARP	DARBY-RIDLEYPK-SHARN HL
SPFDPASF	SWARTHMORE

CLLI	WIRE CENTER NAME
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AMBLPAAM	AMBLER
CNPNPAGE	CENTER POINT
LNDLPALD	LANSDALE
LNLXPALN	LINE LEXINGTON
NWLSPANW	NORTH WALES
PHLAPAIV	OAK LANE
CNSHPACN	CONSHOHOCKEN
ARMRPAAR	ARDMORE
BCYNPABC	CYNWYD-NARBERTH
BRYMPABM	BRYN MAWR
NRTWPANR	NORRISTOWN
PHLAPACH	CHESTNUT HILL
PHLAPAGE	OAK LANE
PHLAPATR	OVERBROOK-WYNNEFIELD
PHLAPAPO	PHILADELPHIA-CENTRAL
PHLAPADE	PHILADELPHIA-CENTRAL
PHLAPAEV	UNIVERSITY CITY
PHLAPAEW	EASTWICK
PHLAPALO	PHILADELPHIA-CENTRAL
PHLAPAPE	PHILADELPHIA-CENTRAL
PHLAPASA	UNIVERSITY CITY
PHLAPASH	PHILA-CITY-WEST
PHLAPAMK	PHILADELPHIA-CENTRAL
PHLAPARE	PHILADELPHIA-CENTRAL
BTHYPABH	BETHAYRES-HUNTINGDON
JENKPAJK	CHELTENHAM-ELKINSPK-JNK
PHLAPABA	PHILADELPHIA-CENTRAL
PHLAPADB	GERMANTOWN-LOGAN
PHLAPAJE	FRANKFORD-MAYFAIR
PHLAPAPI	FOX CHASE
PHLAPAWV	OAK LANE
PSVLPAPV	DUBLIN
DYTWPADB	DOYLESTOWN
BCHMPABU	BUCKINGHAM
BMNSPABM	BEDMINSTER
CRVVPACA	CARVERSVILLE
ERWNPAXE	UHLERSTOWN
FRNDPAXF	FERNDALE
RGVLPARI	UPPER BLACK EDDY
LANGPALA	LANGHORNE
CHVLPACH	FEASTERVILLE-CHURCHVLE
HTBOPAHB	HATBORO
NWTWPANW	NEWTOWN
PIVLPAPV	WYCOMBE

CLLI	WIRE CENTER NAME
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TULYPATU	LEVITTOWN
WGTPAWR	WARRINGTON
WLGRPAWG	WILLOW GROVE
YRDLPAYL	YARDLEY
PHLAPAMY	FRANKFORD-MAYFAIR
EDTNPAED	EDDINGTON-CORNWELLS HTS
PHLAPAKR	BUSTLETON-TORRESDALE
PHLAPAOR	BUSTLETON-TORRESDALE
NWHPPANH	NEW HOPE
NZRTPANA	NAZARETH
BATHPABT	BATH
BNGRPAXB	BANGOR
ESTNPAEA	EASTON
PNARPAXP	PEN ARGYL
BRSTPABR	BRISTOL
MRSLPAMV	MORRISVILLE
HOTWPAHO	HOOKSTOWN
MDLDPAMI	MIDLAND
TYTWPAXT	TAYLORSTOWN
BTTWPABU	BURGETTSTOWN
HCKRPAXH	CARNEGIE-1
MRDVPAXM	MURDOCKSVILLE
BSMRPABE	BESSEMER
ELCYPAEC	ELLWOOD CITY
NWCSPANC	LOWELLVILLE
PRTNPAXP	PRINCETON
PTVLPAXP	PORTERSVILLE
WMPMPAWA	WAMPUM
ENVYPAXE	ENON VALLEY
NBFRPAXN	NEW BEDFORD
PAGVPAXP	PLAIN GROVE
CRPLPACO	CORAOPOLIS
AMBRPAAM	AMBRIDGE
ALQPPAAL	ALIQUIPPA
BADNPABA	BADEN
BVFLPABF	EAST PALESTINE
CRCRPAXC	CRIDERS CORNERS
ROCHPARC	ROCHESTER
SWKYPASE	SEWICKLEY
WXFRPAXW	WEXFORD
ZLNPPAZE	ZELIENOPE
DRTNPAXD	DARLINGTON
SYHLPAXS	SCENERY HILL
WASHPAWA	MOUNT LEBANON

CLLI	WIRE CENTER NAME
MDWYPAXM	MIDWAY
IMPRPAIM	IMPERIAL
BGVLPABR	BRIDGEVILLE
BLLVPABE	BELLEVUE
CARNPACA	CARNEGIE-1
CNBGPACA	CANONSBURG
CRAFPACR	MCKEES ROCKS
MCDDPAMC	MCDONALD
OKDLPAOA	OAKDALE
WSVWPAWE	WEST VIEW
BBTWPAXB	BOBTOWN
RCYVPAXR	RICHEYVILLE
WYBGPAXW	WAYNESBURG
PITBPASQ	PITTSBURGH-CENTRAL
FLYVPAFI	FINLEYVILLE
BTPKPABP	BETHEL PARK-IOC
DRMTPADO	MOUNT LEBANON
MCMRPAMC	MCMURRAY
PITBPAAL	PITTSBURGH-CENTRAL
PITBPACA	MOUNT LEBANON
PLHSPAPH	PLEASANT HILLS
RBTPPART	CARNEGIE-1
SLRKPAXS	SLIPPERY ROCK
PRSPAXP	PROSPECT
EVCYPAXE	EVANS CITY
GIBSPAXG	PITTSBURGH-CENTRAL
GLNSPAGL	GLENSHAW
MCRKPAMR	MCKEES ROCKS
MLVAPAMI	SHARPSBURG
PITBPADT	BELLEVUE
PITBPAEL	EAST LIBERTY
PITBPANS	PITTSBURGH-CENTRAL
PITBPAOK	BETHEL PARK
PYVLPAPE	PERRYVILLE
SHSAPASH	SHARPSBURG
NWSLPANS	NEW SALEM
BWVLPABR	BROWNSVILLE
FRCHPAFA	FAIRCHANCE
PTMRPAPM	POINT MARION
HMSTPAHO	HOMESTEAD
ELZTPAET	MCKEESPORT
BRDDPABR	BRADDOCK
CLRTPACL	CLAIRTON
ELZBPAEL	ELIZABETH

**CELL****WIRE CENTER NAME**

MOVLPAMO	MONROEVILLE
TRCKPATC	TURTLE CREEK
WKBGPAWK	WILKINSBURG
WMFLPAWM	MCKEESPORT
YUKNPAXY	YUKON
MONSPAMO	MONESSEN
DWSNPADA	DAWSON
FYCYPAFC	FAYETTE CITY
HERMPAHE	HERMINIE
IRWNPAIR	IRWIN
MCPTPAMK	MCKEESPORT
PRYPPAPE	PERRYOPOLIS
WNTNPAWN	WEST NEWTON
FRPTPAXF	FREEPORT
NWKNPANK	NEW KENSINGTON
OKMTPAOA	OAKMONT
PEHLPAPH	PENN HILLS
EXPRPAXE	EXPORT
BLVNPABV	BELLE VERNON
BNVLPAXB	BENTLEYVILLE
CHRLPACH	CHARLEROI
CLFRPACA	CALIFORNIA
DNRAPADO	DONORA
KCBGPAXK	GREENSBURG
MNGHPAMO	MONONGAHELA
MTPTPAMP	MOUNT PLEASANT
SCDLPASC	SCOTTDALE
INHDPAXI	INDIAN HEAD
SMCKPASM	SMOCK
UNTNPAUN	UNIONTOWN
CNLVPACO	CONNELLSVILLE
GNBGPAGR	GREENSBURG
JNNTPAJE	JEANNETTE
NWSTPANS	YOUNGWOOD
HRCYPAXH	HARRISON CITY
LGNRPALI	LIGONIER
BLCLPABL	BLACK LICK
BLVIPABL	BLAIRSVILLE
DRRYPADE	DERRY
HMCYPAHO	HOMER CITY
LTRBPALA	LATROBE
VNDGPAXS	VANDERGRIFT
DLMTPAXD	DELMONT
NWAXPAXN	NEW ALEXANDRIA

CLLI	WIRE CENTER NAME
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SESPPAXS	ROCKWOOD
SMRTPAXS	SOMERSET
STTWPAXS	STAHLSTOWN
JHTWPAXB	JOHNSTOWN
JHTWPAXJ	JOHNSTOWN
NWFLPANF	NEW FLORENCE
SWRDPAXS	SEWARD
JHTWPAXG	JOHNSTOWN
MARSPAXM	MARS
BTLRPAXB	BUTLER
CNQNPAXC	CONNOQUENESSING
CPSTPAXC	COOPERSTOWN (BUTLER CO)
CUVLPAXC	CURTISVILLE
DRVLPADO	FOX CHAPEL
MRDNPAXM	MERIDIAN
NIXNPAXN	NIXON
SPDLPASP	SPRINGDALE
SXBGPAXS	SAXONBURG
TRNTPATA	TARENTUM
ELDRPAXE	ELDERTON
VNDGPAXM	VANDERGRIFT
APLLPAXA	APOLLO
FDCYPAXF	FORD CITY
LCBGPAXL	LEECHBURG
INDIPAIN	INDIANA
MRCHPAMA	MARCHAND
CLYMPACL	CLYMER
JHTWPAXN	JOHNSTOWN
NNGOPAXN	NANTY GLO
HVLKPAXH	HARVEYS LAKE
JRMYPAJE	JERMYN
HPVLPAAE	WILLIAMSPORT
CLSMPAXC	CLARKS SUMMIT
DLLSPAXD	TUNKHANNOCK
LKWNPAXL	LAKE WINOLA
CTMRPAXC	CENTER MORELAND
DLTNPAXD	DALTON
MLFRPAXM	MILFORD
LDVYPALV	LORDS VALLEY
HWLYPAHW	HAWLEY
MOSCPAMC	MOOSIC
LGTVPAXL	MILFORD
PTTNPAPI	STROUDSBURG
OLYPPAOL	OLYPHANT

**CLLI****WIRE CENTER NAME**

SCTNPASC	LEHIGHTON
WLPKPAES	WALLENPAUPACK
WYNGPAWY	WYOMING
TNKHPAXT	TUNKHANNOCK
TAYLPATA	TAYLOR
SCNNPAXS	HONESDALE
WYMRPAXW	WAYMART
MLHLPAXE	MILL HALL
MUVLPAES	WILLIAMSPORT
WLPTPAWI	WILLIAMSPORT
MTGMPAXE	MONTGOMERY
WTTWPAXW	WATSONTOWN
LWBGPAXL	SHENANDOAH
MLTNPAMI	MILTON
NRLDPAAA	NORTHUMBERLAND
SHDMPAXS	SELINGROVE
BEWKPABR	BERWICK
DAVLPADA	DANVILLE
MNCYPAXM	MUNCY
TUVLPAXT	TURBOTVILLE
KLMTPAKU	KULPMONT
MNVIPAMI	MINERSVILLE
MTCRPAMC	MOUNT CARMEL
NUMDPANU	NUMIDIA
SHNDPASH	SHENANDOAH
TRMTPAXT	TREMONT
HZTNPAHZ	HAZLETON
CNYNPAXC	CONYNGHAM-DRUMS
KGTNPAES	KINGSTON
MNTPPAMO	MOUNTAINTOP
NGLPAXN	NUANGOLA
NNTCPANA	NANTICOKE
PLMOPAPL	PLYMOUTH
SHCKPAXS	SHICKSHINNY
MHCYPAMC	MAHANOEY CITY
MCADPAMC	MCADOO
ORBGPAOR	ORWIGSBURG
PTTVPAPO	SAINT CLAIR
SCHNPASC	SCHUYLKILL HAVEN
LKWDPAXL	LAKESWOOD
LNFRPAXL	LANSFORD
WHHNPAPH	WHITE HAVEN
BRCKPAES	WILKES-BARRE
MSCWPAMW	MOSCOW

<u>CLLI</u>	<u>WIRE CENTER NAME</u>
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PCLKPAXP	POCONO LAKE
WLBPAWB	WILKES-BARRE
ABVLPAES	WHITE HAVEN
JMTHPAJT	JIM THORPE
KRSVPAXK	KRESGEVILLE
LHTNPALE	LEHIGHTON
NSQHPANE	NESQUEHONING
ASLDPAAL	ASHLAND
BMBGPABL	ASHLAND
CTWSPAES	CATAWISSA
EYBGAEL	ELYSBURG
FAVLPFR	FRACKVILLE
PNGVPAXP	PINE GROVE
BWMNPAXB	BOWMANSTON
FELDPFR	FREELAND
CRSPAES	CRESCO
MTPCPAMP	MOUNT POCONO
TBYHPATO	MOUNT POCONO
TNVLATA	STROUDSBURG
SYBGPAXS	SAYLORSBURG
NFLDPANE	NEWFOUNDLAND
GNVLPAGR	GREENVILLE
JMTWPAXJ	JAMESTOWN
SHKVPAXS	SHEAKLEYVILLE
FKLNPAXF	FRANKLIN
FRDNPAXF	FREDONIA
VLNTPAXV	VOLANT
GVCYPAGR	GROVE CITY
BLTWPAXB	BLACKTOWN
MRCRPAME	MERCER
NWWLPAXN	NEW WILMINGTON
WMDLPAXM	WEST MIDDLESEX
SRVLPASH	SHARPSVILLE
TRNSPAXT	GREENVILLE
STMYPAXS	EMPORIUM
WSLYPAXW	WESLEY
EMTNPAXE	EMLENTON
CIVLPAXC	CLINTONVILLE
KNOXPAXK	KNOX
CLARPACL	CLARION
CRSCPAXC	CORSICA
BKVLPAXB	BROOKVILLE
PUNXPAPU	PUNXSUTAWNEY
RYVLPARE	REYNOLDSVILLE

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SYVLPASY	SYKESVILLE
LUBGPAXL	LUTHERSBURG
PHBGPAPH	PHILIPSBURG
WDLDPAWO	CLEARFIELD
WNBPAWI	WINBURNE
PTMTPAXP	PORT MATILDA
BOALPABO	BOALSBURG
CTHLPACH	CENTRE HALL
HWRDPAXH	HOWARD
PLSGPAPG	BELLEFONTE
STCGPAES	STATE COLLEGE
ZIONPAXZ	ZION
CRWVPACU	CURWENSVILLE
BGRNPABR	BIG RUN
DUBSPADU	PUNXSUTAWNEY
NDMRPAXN	NEEDMORE

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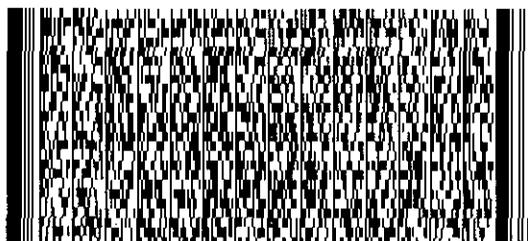
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1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.