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ARIZONA CORPORATION COMMISSION

2009 JUL 27 P 4: 10

In the Matter of

AZ CORP COMMISSION
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Petition of TracFone Wireless, Inc.
for Designation as an Eligible Telecommunications
Carrier in the State of Arizona for the Limited
Purpose of Offering Lifeline Service to Qualified
Households

) Docket No. T-20664A-09-0148
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**TRACFONE WIRELESS, INC.'S FIRST AMENDMENT TO PETITION FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

TracFone Wireless, Inc. ("TracFone"), by its undersigned counsel, amends its Petition for Designation as an Eligible Telecommunications Carrier ("ETC"), filed March 29, 2009. In TracFone's ETC Petition, it requested designation as an ETC for the purpose of offering Lifeline and Link Up service. By this filing, TracFone withdraws its request to be designated as an ETC for purposes of providing Link Up services.

As explained in TracFone's ETC Petition, on September 8, 2005, the Federal Communications Commission ("FCC") exercised its forbearance authority under 47 U.S.C. § 160 with respect to the facilities-based service requirement for ETCs set forth in 47 U.S.C. § 214(1)(A) and 47 C.F.R. § 54.201(i).¹ However, the scope of the FCC's order is limited to TracFone's provision of Lifeline services only.² Therefore, unless and until the FCC were to expand the scope of its grant of forbearance to include Link Up, TracFone may not seek ETC

¹ Petition of TracFone Wireless, Inc. for Forbearance from 47 USC § 214(e)(1)(A) and 47 CFR § 54.201(i), 20 FCC Rcd 15095 (2005) ("TracFone Forbearance Order"). A copy of the TracFone Forbearance Order is attached hereto as Exhibit 2.

² See id., ¶¶ 1-2, 17.

Arizona Corporation Commission

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designation to provide Link Up benefits or seek Link Up support from the federal universal service fund.

The benefits provided to TracFone's Lifeline customers in Arizona, as described in its ETC Petition will not change. All qualified Lifeline customers in Arizona will receive 68 minutes of use each month at no charge. Unused minutes will roll over from month-to-month so long as the customer remains enrolled in the Lifeline program. TracFone will also provide handsets to all Lifeline customers at no charge.

Respectfully submitted,



Mitchell F. Brecher
Debra McGuire Mercer

GREENBERG TRAUIG, LLP
2101 L Street, NW
Suite 1000
Washington, D.C. 20037
(202) 331-3100

Counsel for TracFone Wireless, Inc.

July 23, 2009

Greenberg Traurig

Debra McGuire Mercer
Tel 202.331.3194
Fax 202.261.0194
mercerdm@gtlaw.com

July 23, 2009

VIA OVERNIGHT DELIVERY

Arizona Corporation Commission
Utilities Division
1200 West Washington
Phoenix, AZ 85007-2996

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AZ CORP COMM
Director Utilities

Re: Petition of TracFone Wireless Inc. for Designation as an Eligible
Telecommunications Carrier

Dear Madam/Sir:

Enclosed please find an original and 13 copies of TracFone Wireless, Inc.'s First Amendment to Petition for Designation as an Eligible Telecommunications Carrier. An additional copy is included to be date-stamped and returned in the enclosed envelope. Please contact me if you have any questions about this submission.

Sincerely,



Debra McGuire Mercer

Counsel for TracFone Wireless, Inc.