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March 22, 2012

## VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Amended Petition of Cricket Communications, Inc. for Designation as an Eligible Telecommunications Carrier, WC Docket No. 09-197**

Dear Ms. Dortch:

By this letter, Cricket Communications, Inc. (“Cricket”) supplements the Amended Petition for Designation as an Eligible Telecommunications Carrier filed by Cricket on March 12, 2012 in the above-referenced proceeding (the “Amended Petition”). More specifically, Cricket is submitting the following additional exhibits to the Amended Petition:

- A new “Exhibit 8” to the Amended Petition, consisting of Cricket’s Lifeline application template. This template will be customized for use in each state in which Cricket is designated as an eligible telecommunications carrier. While the appearance of each state-specific Lifeline application form may vary slightly, Cricket anticipates that the substance of the application forms will be uniform.
- A new “Exhibit 9” to the Amended Petition, which summarizes the procedures that Cricket currently anticipates it will use to: (i) review and verify documentation of a customer’s eligibility to participate in the Lifeline program; and (ii) complete the annual recertification process. While these procedures may change in some respects prior to their final implementation, they will at all times reflect Cricket’s continuing commitment to full compliance with the Commission’s rules.

Cricket is hopeful that these additional materials will facilitate the Commission's ability to grant the Amended Petition promptly. Please contact the undersigned should you have any questions.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill  
Jarrett S. Taubman

*Counsel to Cricket Communications, Inc.*

Attachments

## **EXHIBIT 8**

# **CRICKET LIFELINE APPLICATION TEMPLATE**

Cricket Lifeline Credit – (State)

Lifeline is a government assistance program that grants eligible individuals a credit each month on their phone bill. You may qualify for a \$10.00 credit on your monthly wireless bill if you receive low income benefits under certain programs and/or if your total household income is below 135% of the federal poverty guidelines. **You must have (or sign-up for) Cricket Wireless service to receive this credit.** The Cricket Lifeline Credit is only available for Cricket Wireless service; it is not available for Cricket Broadband or Cricket PAYGo service.

If you are a resident of (state), you may qualify for the Cricket Lifeline Credit by one of two methods. Method 1 is program-based; if you or another person in your household is enrolled in at least one of the public assistance programs listed below, you may qualify. Method 2 is income-based; you may also qualify if your household’s total gross income is at or below the income limits listed below. **You must provide documentation verifying participation in at least one of the programs listed below or provide documentation verifying your household income.** Bring this application and your documentation to a Cricket Corporate-Owned Store or Exclusive Cricket Dealer. To locate the store nearest you, visit [www.mycricket.com/locations](http://www.mycricket.com/locations).

1. QUALIFYING PROGRAMS/INCOME LEVELS *(check only one – proof of program enrollment or income is required)*

<p><b><u>METHOD 1: PROGRAM-BASED</u></b></p> <p><input type="checkbox"/> <b>LIHEAP</b> (Low-Income Home Energy Assistance Program)</p> <p><input type="checkbox"/> <b>Medicaid</b></p> <p><input type="checkbox"/> <b>Section 8</b> (Federal Public Housing Assistance)</p> <p><input type="checkbox"/> <b>SNAP</b> (Supplemental Nutrition Assistance Program; Food Stamps)</p> <p><input type="checkbox"/> <b>SSI</b> (Supplemental Security Income)</p> <p><input type="checkbox"/> <b>TANF</b> (Temporary Assistance for Needy Families)</p> <p><input type="checkbox"/> <b>NSLP</b> (National School Lunch Program; Free Lunch Program Only)</p> <p><b><u>Supporting Documentation Required</u></b></p> <p><b>Program Based (Method 1)</b></p> <p><input type="checkbox"/> Benefit card or documentation from qualifying program</p> <p><input type="checkbox"/> Notice or letter of participation in a qualifying program</p> <p><input type="checkbox"/> Official document demonstrating that applicant, one or more of applicant’s dependents or applicant’s household receives benefits from a qualifying program</p> <p><input type="checkbox"/> Current or prior year’s statement of benefits from qualifying program</p>	<p><b><u>METHOD 2: Income-BASED</u></b></p> <p><input type="checkbox"/> <b>One Person Household:</b> Less than \$15,080 Annually</p> <p><input type="checkbox"/> <b>Two Person Household:</b> Less than \$20,426 Annually</p> <p><input type="checkbox"/> <b>Three Person Household:</b> Less than \$25,772 Annually</p> <p><input type="checkbox"/> <b>Four Person Household:</b> Less than \$31,118 Annually</p> <p><input type="checkbox"/> <b>Five Person Household:</b> Less than \$36,464 Annually</p> <p><input type="checkbox"/> <b>Six Person Household:</b> Less than \$41,810 Annually</p> <p><input type="checkbox"/> <b>Seven Person Household:</b> Less than \$47,156 Annually</p> <p><input type="checkbox"/> <b>Eight Person Household:</b> Less than \$52,502 Annually</p> <p><input type="checkbox"/> <b>More Than Eight Person Household:</b> Less than \$52,502, plus \$5,346 for each additional member, Annually</p> <p><b><u>Supporting Documentation Required</u></b></p> <p><b>Income Based (Method 2)</b></p> <p><input type="checkbox"/> 3 consecutive months of pay stubs within the previous 12 months.</p> <p><input type="checkbox"/> Current income statement or W-2 from an employer</p> <p><input type="checkbox"/> State or federal income tax return</p> <p><input type="checkbox"/> Unemployment/Workers’ Compensation statement of benefits</p> <p><input type="checkbox"/> Social Security, Veterans Administration or retirement/pension statement of benefits</p> <p><input type="checkbox"/> Any other legal document that shows current income (such as a divorce decree or child support documents)</p>
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2. APPLICANT INFORMATION (please print – applicant’s name must match the name on the applicant’s phone bill)

Last Name \_\_\_\_\_

First Name \_\_\_\_\_ Middle Initial \_\_\_\_\_

Residential Street Address (No PO Box) \_\_\_\_\_ Apt #: \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

The above address is my permanent residential address: Y / N (Circle the appropriate response)

\_\_\_\_\_ If I provided a temporary residential address above, I am required to verify this temporary address every 90 days.

- ✓ A temporary address is one that is not associated with a permanent residence in which you live. Such an address may be used during a transitional period, such as staying with a family member or in a shelter.

3. LEGAL REQUIREMENTS

Please acknowledge your agreement by initialing every line below and signing the application:

\_\_\_\_\_ I understand that completion of this application does not constitute immediate approval for the Cricket Lifeline Credit. It may take up to 30 days for the credit to appear on my account.

\_\_\_\_\_ I authorize Cricket Communications to access any records required to verify my statements herein and to confirm my eligibility for the Cricket Lifeline Credit. I also authorize Cricket Communications to release any records required for the administration of the Cricket Lifeline Credit program, including to the Universal Service Administrative Company.

\_\_\_\_\_ I am head of household and no one at my residence receives landline or wireless Lifeline service from another provider. An example of another landline provider would be (insert name) and an example of another wireless provider would be (insert wireless carrier names)

- ✓ Violation of the one-per-household limitation constitutes a violation of the rules and will result in de-enrollment from the program.

\_\_\_\_\_ I understand that Cricket Lifeline Credit is only available for **ONE RESIDENTIAL PHONE LINE PER HOUSEHOLD** (either landline or wireless but not both).

- ✓ A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.

\_\_\_\_\_ I agree to notify Cricket Communications within 30 days if I no longer meet the criteria for receiving Lifeline (i.e. no longer meet the income-based or program-based criteria, receiving more than one Lifeline benefit or another member of my household is also receiving a Lifeline benefit.)

\_\_\_\_\_ I agree to notify Cricket Communications within 30 days if I move and to provide Cricket Communications with my new address.

\_\_\_\_\_ I understand that the Cricket Lifeline Credit is a non-transferable benefit and may not be transferred to any other person.

\_\_\_\_\_ I understand that I may be required to verify my continued eligibility for the Cricket Lifeline Credit at any time and that failure to do so will result in de-enrollment and termination of the Cricket Lifeline Credit benefits.

\_\_\_\_\_ I understand that Lifeline is a federal benefit and willfully making false statements or providing false or fraudulent documents to obtain the benefit is punishable by law and can result in fines, imprisonment, de-enrollment or being barred from the program.

By signing below, I certify under **penalty of perjury** that the all information contained in this application is true and correct and that I meet the income-based or program-based eligibility criteria for the Cricket Lifeline Credit.

Applicant Signature \_\_\_\_\_

Date of Signature \_\_\_\_\_ Date of Birth \_\_\_\_\_

Last 4 Digits of Social Security Number \_\_\_\_\_

**CRICKET / STORE USE ONLY (all fields must be completed prior to submission):**

SUBSCRIBER LAST NAME \_\_\_\_\_

MDN \_\_\_\_\_

Account Number \_\_\_\_\_

New Customer \_\_\_\_\_ Yes \_\_\_\_\_ No

Date of Cricket Activation \_\_\_\_\_

Current Rate Plan (Cricket Wireless ONLY) \_\_\_\_\_

Verification of State/Federal Picture ID \_\_\_\_\_ Yes \_\_\_\_\_ No **(REQUIRED)**

Store Number/CID Login \_\_\_\_\_

Date Application Submitted to Cricket \_\_\_\_\_

CHECK DOCUMENT(S) PRESENTED FOR ELIGIBILITY AND INDICATE NUMBER OF INDIVIDUALS IN HOUSEHOLD

<p><b><u>METHOD 1: PROGRAM-BASED – Check only one</u></b></p> <p>_____ <b>LIHEAP</b> (Low-Income Home Energy Assistance Program)</p> <p>_____ <b>Medicaid</b></p> <p>_____ <b>Section 8</b> (Federal Public Housing Assistance)</p> <p>_____ <b>SNAP</b> (Supplemental Nutrition Assistance Program; Food Stamps)</p> <p>_____ <b>SSI</b> (Supplemental Security Income)</p> <p>_____ <b>TANF</b> (Temporary Assistance for Needy Families)</p> <p>_____ <b>NSLP</b> (National School Lunch Program; Free Lunch Program Only)</p>	<p><b><u>METHOD 2: INCOME-BASED</u></b></p> <p>_____ <b>Indicate the Number of Individual(s) in Household</b></p> <p>_____ 3 consecutive months of pay stubs within the previous 12 months.</p> <p>_____ Current income statement or W-2 from an employer</p> <p>_____ State or federal income tax return</p> <p>_____ Unemployment/Workers’ Compensation statement of benefits</p> <p>_____ Social Security, Veterans Administration or retirement/pension statement of benefits</p> <p>_____ Any other legal document that shows current income (such as a divorce decree or child support documents)</p>
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**I hereby attest that the supporting documentation was presented and verified. (REQUIRED)**

**Company Representative (please print)** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Title** \_\_\_\_\_

**Date** \_\_\_\_\_

## **EXHIBIT 9**

# **ANTICIPATED PROCEDURES FOR CUSTOMER DOCUMENTATION REVIEW AND ANNUAL RECERTIFICATION**

## **I. INITIAL REVIEW OF CUSTOMER DOCUMENTATION OF ELIGIBILITY TO PARTICIPATE IN THE LIFELINE PROGRAM**

Cricket has been designated as an eligible telecommunications carrier (“ETC”) in nine states. In a number of those states, independent of any Federal Communications Commission rule or requirement, Cricket reviews documentation of a customer’s program-based and/or income-based eligibility prior to enrollment in the Lifeline program. Thus, Cricket already has established procedures for reviewing customer documentation to determine eligibility to participate in the Lifeline program. Cricket anticipates that it will adapt these procedures for use in all states in which it is designated as an ETC.

Cricket currently requires all Lifeline applicants to apply in person in a retail store. Cricket provides store managers, sales representatives, and dealer personnel with training designed to permit them to review customer documentation and determine whether it is sufficient to establish a customer’s eligibility to participate in the Lifeline program under the Commission’s rules. Cricket’s training department has developed (and continues to update) this training program in conjunction with Cricket’s Lifeline program team and Cricket’s product group. No Cricket employee may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material by passing a test designed for that purpose. Cricket dealer personnel also must complete the training program and demonstrate an understanding of Lifeline program requirements to the Cricket manager assigned to that location, particularly with respect to eligibility and documentation requirements.

Among other things, the Lifeline program training discusses Cricket’s Lifeline application form (see Exhibit 8 to Amended ETC Application) on a section-by-section basis. Notably, that form was designed to permit Cricket personnel to verify that a Lifeline applicant has satisfied all requirements to participate in the Lifeline program. The training explains what sections of the form must be completed by the customer, as opposed to an employee. The training also reviews the “Legal Requirements” section of the form in detail, to facilitate an employee’s ability to explain each item contained therein and answer any customer questions.

Cricket’s Lifeline application contains a “Cricket/Store Use Only” section, which must be completely filled out and signed by the Cricket employee or representative. This section is designed so that Cricket personnel can record information about the specific documentation reviewed as part of the eligibility verification process. Eligibility documents are returned to the customer after review.

Once the Cricket Lifeline application is complete, it is scanned into Cricket’s Lifeline database for further review and approval. That copy is retained to facilitate future review and verification of customer eligibility. Cricket returns the completed paper application to the customer after it has been scanned so that he or she can retain a copy.

## **II. CRICKET’S ANNUAL RECERTIFICATION PROCESS**

Cricket has not yet established firm procedures through which it will complete the annual recertification process required by the Commission’s new Lifeline rules. The company is



examining technical and other changes necessary to implement that process fully, and is committed to full compliance with the Commission's rules. Cricket currently intends to use the methods described in this exhibit to implement its annual recertification process, but may employ alternative compliance procedures in the future.

First, Cricket intends to use appropriate eligibility databases, to the extent available, to confirm that a given subscriber still satisfies applicable program-based or income-based requirements to participate in the Lifeline program. Cricket would document the database used to perform this verification and the date on which that database was accessed.

If an appropriate database is not available, Cricket intends to notify each Lifeline customer—via short message service (“SMS”) text message, voice mail message, or other means—of the requirement to recertify his/her Lifeline eligibility. A customer would be able to recertify his or her eligibility through a number of different methods. For example, a customer could visit a Cricket store to complete the recertification process. It is also possible that a customer could complete the recertification process by sending a SMS text message response, using an interactive voice response (“IVR”) telephone system, using Cricket's website, or returning a completed recertification form (available on Cricket's website) to Cricket by mail or fax.

If a Lifeline customer fails to respond to the recertification request, Cricket will follow the de-enrollment guidelines provided in 47 C.F.R. § 54.405(e)(4).