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May 2, 2018

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, New York 12333

Re: New York State Lifeline Program

Dear Secretary Burgess:

During the 2017 Legislative session, I sponsored a bill that Governor Cuomo signed into law that expands New York State's Lifeline Program to allow wireless telecommunications providers to offer wireless Lifeline service, regardless of whether the provider is a facilities-based provider, and to receive distributions from the Targeted Accessibility Fund (TAF).

Today, I am respectfully requesting you consider TracFone Wireless, Inc.'s ("TracFone") petition to participate in the New York State Lifeline Program and to receive distributions from the TAF. This petition would: (1) authorize TracFone to provide wireless Lifeline service pursuant to the state Lifeline program; and (2) authorize TracFone to receive distributions from the TAF in the amount of \$11.00 per household per month in order to fund TracFone's enhanced service offering.

TracFone offers Lifeline service to approximately 328,000 households in New York State with funding limited to federal Universal Service Fund ("USE") support of \$9.25 per household per month. However, TracFone also provides affordable telecommunications service to consumers to whom wireless service is otherwise unavailable or impracticable. With this petition, TracFone proposes to expand its service offering in New York State by substantially increasing voice and data usage allowances for eligible households in the state.

TracFone is unique as it provides wireless service by reselling services obtained from licensed operators of facilities-based CMRS networks. In New York, TracFone obtains service from AT&T Mobility, T-Mobile, and Verizon Wireless. TracFone's arrangements with these providers enables it to offer services wherever any of those providers offer service in New York State.

As the nation's leading wireless provider of Lifeline and a proven provider in this state already, TracFone is well positioned to offer enhanced capability once the Commission authorizes TracFone to receive distributions from TAF. In addition to meeting the basic qualifications for participating in the expanded state Lifeline program, the proposed service meets the needs of low-income households and addresses continued growth in the importance of mobile broadband access.

Low-income households are very reliant on wireless telecommunications services, including mobile broadband. Many TracFone households use the service as their sole telecommunications service. In fact, wireless service often makes more sense to many of these low-income users because their housing situations may be unstable. Therefore, a wireline service does not suit their needs. Like other households, low-income households want wireless service because of the convenience and accessibility that it provides.

Given the combination of these factors, TracFone's proposal gives New Yorkers an opportunity to participate more fully in this new technological environment without an added cost burden, which is what my legislation intended.

The Commission's approval of this Petition will enable TracFone to enhance significantly SafeLink service to eligible recipients in New York State to meet current and growing technological need. For these reasons, I would respectfully request that the Commission promptly grant this request for TracFone to participate in the state Lifeline program.

Sincerely,

A handwritten signature in black ink that reads "Joseph A. Griffo". The signature is written in a cursive, flowing style.

Joseph A. Griffo
Senator, 47th District

cc: Alphonso David, Counsel to the Governor