

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
T-Mobile Puerto Rico, LLC)	WC Docket No. 11-42
)	
Application to Participate in the)	
Broadband Adoption Lifeline Pilot)	
Program)	

**T-MOBILE PUERTO RICO, LLC APPLICATION TO PARTICIPATE IN THE
BROADBAND ADOPTION LIFELINE PILOT PROGRAM**

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T-Mobile Puerto Rico, LLC (“T-Mobile Puerto Rico”) hereby submits its application to participate in the Broadband Adoption Lifeline Pilot Program (“Pilot Program”) pursuant to the requirements established in the *Broadband Lifeline Pilot Public Notice*.¹ T-Mobile Puerto Rico’s participation in the Pilot Program will be critically important as it will establish a broadband lifeline program for eligible consumers in Puerto Rico, and will provide the Commission with vital information for the establishment of a permanent Lifeline program that makes affordable broadband service available to eligible low-income households. As explained herein, T-Mobile Puerto Rico meets the requirements for participation in the Pilot Program and its proposed broadband project includes the preferred attributes of a third party digital literacy partner,¹ high-speed broadband upload and download speeds, and expanded reporting and data gathering on broadband service metrics.

¹ Wireline Competition Bureau Announces Application Procedures and Deadline For Applications To Participate in the Broadband Adoption Lifeline Pilot Program, WC Docket No. 11-42, DA 12-683, April 30, 2012 (“*Broadband Lifeline Pilot Public Notice*”).

INTRODUCTION

The Commission has recognized the importance of access to broadband services by all consumers. In its *USF/ICC Transformation Order*, the Commission adopted the goal of ensuring “the universal availability of modern networks capable of delivering mobile broadband and voice service in areas where Americans live, work, or travel.”² To this end, the Commission reformed the universal service program to require carriers designated as Eligible Telecommunications Carriers (“ETCs”) to deploy broadband ready communications networks, thereby enabling consumers to have access to broadband services. In its subsequent *Lifeline Reform Order*, the Commission took “the first step in working towards achieving one of the three express goals of the [Lifeline] program – recognizing the importance of the availability of broadband services for low-income Americans by creating a low-income broadband pilot program.”³ The Commission directed the Wireline Competition Bureau (“Bureau”) to solicit applications from ETCs to participate in the Pilot Program and “to select a relatively small number of projects to test the impact on broadband adoption with variations in the monthly discount for broadband services, including variations on the discount amount, the duration of the discount (phased down over time or constant) over a 12-month period.”⁴ On April 30, 2012, the Bureau released the *Broadband Lifeline Pilot Public Notice*, announcing the filing requirements for participation in the pilot program. T-Mobile Puerto Rico submits this Application, consistent with the applicable filing requirements and in furtherance of

² *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Red 17663, 17682 (2011) (“*USF/ICC Transformation Order*”).

³ *Lifeline and Link Up Reform and Modernization*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, FCC 12-11, ¶ 322 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

⁴ *Id.* at ¶ 325.

the public interest of making broadband Lifeline service available to eligible low-income consumers in Puerto Rico.

I. APPLICANT INFORMATION

The information required by the *Broadband Lifeline Pilot Public Notice* regarding T-Mobile Puerto Rico and its proposed broadband project is as follows.

- A. Names and identifiers used by the ETC applying for Pilot Program funding, including its holding company, operating company and all affiliates; its FCC Registration Number (FRN), study area codes (SACs), a list of states where the ETC is currently designated to provide Lifeline service; detailed information, including geographic locations, of the ETC’s current service offerings in the market; and if a Tribal entity has an ETC designation pending, provide detailed information regarding the ETC application, including the proposed geographic locations.**

T-Mobile Puerto Rico is a wholly-owned subsidiary of T-Mobile USA, Inc. (“T-Mobile USA”).⁵ T-Mobile USA is a national facilities-based provider of wireless voice, messaging, and data services capable of reaching over 293 million Americans. T-Mobile Puerto Rico itself employs more than 500 individuals at company-owned retail locations and a call center within the Commonwealth of Puerto Rico. As of the end of the first quarter of 2012, T-Mobile USA serves approximately 33.4 million mobile customers throughout the United States.⁶ T-Mobile USA has deployed an advanced telecommunications network throughout the United States capable of serving consumers’ basic and advanced communications needs.

⁵ In addition, T-Mobile Puerto Rico Holdings, LLC is a holding company of T-Mobile Puerto Rico.

⁶ See Press Release, *T-Mobile USA Reports First Quarter 2012 Operating Results* (May 9, 2012), available at <http://newsroom.t-mobile.com/articles/t-mobile-reports-first-quarter-2012>.

T-Mobile USA provides its customers with high quality service and consumer care benefits that have resulted in the company being recognized for excellence.⁷ On March 16, 2012, T-Mobile USA was also recognized by the Ethisphere Institute as one of the World's Most Ethical Companies in 2012 for the fourth year in a row.⁸ T-Mobile USA has earned this prestigious distinction by continuing to implement ethical business practices and initiatives that are instrumental to the company's success, while benefitting the communities that T-Mobile USA serves and raising the standard for the industry. T-Mobile USA was the only U.S. wireless telecommunications service provider included on the Ethisphere Institute's 2012 list.

T-Mobile Puerto Rico (or its predecessor-in-interest in Puerto Rico) has been an ETC for purposes of both high-cost and Lifeline universal service in Puerto Rico since 2003.⁹

T-Mobile Puerto Rico's ETC service area in Puerto Rico includes all territories and islands that make up the Commonwealth of Puerto Rico. Attached as Exhibit A is a list of the telephone company areas that comprise T-Mobile Puerto Rico's ETC service area in Puerto Rico.

⁷ See Press Release, J.D. Power and Associates, *Interaction with Agents May Significantly Elevate Satisfaction with the Wireless Customer Care Experience, T-Mobile Ranks Highest in Wireless Customer Care Performance for Second Consecutive Time* (Feb. 3, 2011), available at <http://businesscenter.jdpower.com/news/pressrelease.aspx?ID=2011010>.

⁸ See Press Release, *T-Mobile Named to Ethisphere's 2012 World's Most Ethical Companies List for Fourth Year in a Row*, (Mar. 16, 2012) available at <http://newsroom.t-mobile.com/articles/t-mobile-recognized-by-etisphere-institute>.

⁹ *TeleCorp Communications, Inc., d/b/a AT&T Wireless, Petitioner*, Common Wealth of Puerto Rico, Puerto Rico Telecommunications Regulatory Board ("PR TRB"), Docket No. JRT-2003-SU-0003, Order, (rel. Sept. 10, 2003, eff. September 30, 2003) ("*T-Mobile Puerto Rico ETC Order*"). On November 18, 2004, the entity name was changed to SunCom Wireless, Inc. ("SunCom"). Thereafter, T-Mobile USA acquired SunCom and became the successor-in-interest to SunCom's ETC designation. A name change for the operating entity from SunCom Wireless, Inc. to T-Mobile Puerto Rico LLC was entered at the PR TRB on June 3, 2008.

All services offered by T-Mobile Puerto Rico are available at <http://www.t-mobilepr.com/>. As an ETC, T-Mobile Puerto Rico offers the services that are supported by the universal service program as required by Commission rules. With regard to Lifeline services in particular, T-Mobile Puerto Rico currently has two Lifeline service offerings available to eligible low-income consumers, which are summarized below:

Plan	Recurring Charges	Included Buckets and Restrictions
Lifeline Unlimited Talk & Text	<ul style="list-style-type: none"> • \$39.99 per month • Recurring \$13.50 credit 	<ul style="list-style-type: none"> • Unlimited Whenever Minutes® • 0 Night Minutes • 0 Weekend Minutes • Unlimited incoming minutes • Unlimited text messages • Local calling only – long distance is restricted (including international) • If long distance is enabled (unrestricted), a deposit is required • Unused minutes do not carry over to next billing cycle • 1-year service agreement required for new activations • Existing customers are not required to replace an expired or active contract but must complete the terms of a currently active 1-year service agreement
Lifeline Golden Plan	<ul style="list-style-type: none"> • \$19.99 per month • Recurring \$13.50 credit 	<ul style="list-style-type: none"> • 300 Whenever Minutes® • 0 Night Minutes • 0 Weekend Minutes • Unlimited incoming minutes • Local calling only – long distance is restricted (including international) • If long distance is enabled (unrestricted), a deposit is required • Unused minutes do not carry over to next billing cycle • 1-year service agreement required for new activations • Existing customers are not required to replace an expired or active contract but must complete the terms of a currently active 1-year service agreement

T-Mobile Puerto Rico has been assigned study area code 639003 by the Universal Service Administrative Company (“USAC”).

T-Mobile Puerto Rico’s federal registration number (“FRN”) is 0014848477.

T-Mobile USA and its affiliates are ETCs for purposes of legacy high-cost universal service support, Lifeline-only support, and/or Mobility Fund support in numerous states. Attached as Exhibit B is list of T-Mobile USA and its affiliates’ ETC designations and pending applications.

T-Mobile Puerto Rico has been providing universal service, including Lifeline service, in Puerto Rico since 2003. It is a well-established Lifeline service provider with a long history of providing communications services that meet the needs of Puerto Rico’s low-income consumers. Over the last couple of years, T-Mobile Puerto Rico’s Lifeline customer base has increased by 46%, driven by targeted outreach initiatives and availability of Lifeline voice services that meet the needs of low-income consumers. Consumers can visit any of T-Mobile Puerto Rico’s 10 specialty Lifeline retail locations to obtain Lifeline service and meet with highly trained customer service representatives, who validate, qualify, and activate consumers on Lifeline service plans. T-Mobile Puerto Rico is able to meet the needs of low-income consumers by providing Lifeline service through dedicated Lifeline customer service representatives, who are also able to ensure that only eligible low-income consumers are able to obtain Lifeline service, consistent with the requirements of the Commission and the PR TRB.

B. A full description of the proposed pilot project(s).

T-Mobile Puerto Rico’s proposed Lifeline broadband project will determine the affordable price point, data preferences, and mobile broadband interests of low-income consumers. The project will specifically study the effectiveness of a \$20 monthly

discount off of T-Mobile's standard mobile broadband rate plans to stimulate broadband adoption among low-income consumers. Rather than create substandard broadband service offerings for Lifeline eligible consumers, T-Mobile's approach is to allow all consumers – low income or otherwise – to have access to high quality broadband service offerings, but at a discounted monthly recurring rate for eligible Lifeline consumers.

T-Mobile Puerto Rico will leverage its existing 3G, HSPA+21, and HSPA+42 networks in Puerto Rico to make available broadband Lifeline service offerings to project participants throughout all of Puerto Rico. In Puerto Rico, a high percentage of the population falls within the low-income bracket and many households do not have broadband service. T-Mobile anticipates that a properly structured broadband Lifeline offering will be very well received, of great value to eligible consumers, and will increase broadband penetration among low-income consumers who have an interest and need for broadband services but lack access to affordable broadband services. T-Mobile Puerto Rico's broadband Lifeline project will evaluate the reasons for low-income consumers' lack of access to affordable broadband services and will provide the Commission with the necessary information to help it adopt and implement a permanent Lifeline program for the provision of affordable broadband service to eligible low-income consumers.

T-Mobile Puerto Rico will undertake a three-step approach to its broadband project. The first step will be to conduct quantitative research on the broadband Lifeline market, including an analysis of the low-income population in Puerto Rico, to gauge overall knowledge and usage of broadband service and measure price elasticity of broadband service to determine an affordable price point. As part of this first step, T-Mobile Puerto Rico will conduct a survey of at least 600 low-income consumers, which

will provide a confidence level of 95% and a margin of error of +/-4%. The survey will include only those individuals that meet the requirements for participation in the Lifeline program. The survey will include questions on:

- general demographics (age, sex, income level, household composition, place of residence, etc.);
- overall level of interest by low-income consumers in mobile broadband, including use of mobile broadband devices such as smart phones, routers, data sticks, and tablets;
- level of knowledge of how mobile broadband service can be used by low-income consumers, including knowledge of mobile broadband devices such as smart phones, routers, data sticks, and tablets;
- ownership of wireless phones, including smart phones and any data devices;
- access to fixed or other broadband services;
- likelihood of purchasing mobile broadband service based upon different monthly service plans and broadband equipment costs, such as free, \$25, \$50, \$75, \$100; and
- how much customers are willing to pay in monthly recurring charges for mobile broadband service (\$9.99, \$19.99, 29.99, \$44.99, \$49.99, \$54.99, \$59.99, \$84.99).

The second step will be to implement a broadband Lifeline outreach initiative, in conjunction with T-Mobile Puerto Rico's broadband digital literacy partner, and make available broadband Lifeline service to eligible low-income consumers. Information

developed through the quantitative research in step one will be incorporated into the outreach initiative for the broadband project offering. The broadband project offering will then be made available to a broad cross-section of eligible low-income consumers in Puerto Rico.

The third step will be to analyze the data from the outreach initiative and broadband project offering to determine the effectiveness of the outreach initiatives and the discounted broadband rate plans in increasing penetration within low-income households.

The specific project information required by the *Broadband Lifeline Pilot Public Notice* is as follows.

- 1. The geographic area(s) in which the ETC will offer the broadband plan(s) for their project(s), census data on the income levels of the residents of the specified geographic area(s) (census tracts, blocks or zip codes), and whether the geographic area(s) will cover Tribal lands.**

T-Mobile Puerto Rico will offer its broadband pilot project throughout Puerto Rico, thereby allowing all potentially eligible low-income consumers in Puerto Rico to participate in the project. There are approximately 3,336,993 individuals and 1,235,929 households in Puerto Rico with an annual income of \$17,518.00 or less.¹⁰ Census data on potentially eligible consumers in Puerto Rico is included in the response in subsection 6 below. Assuming that approximately 25% of Puerto Rico households qualify for Lifeline service, there are approximately 308,982 households that would be eligible to receive the proposed Lifeline discount. It is estimated that 70% of households in Puerto Rico do not subscribe to broadband service.¹¹ There are no tribal lands in Puerto Rico.

¹⁰ *Puerto Rico Broadband Strategic Plan*, prepared by the Puerto Rico Broadband Taskforce with support from Connect Puerto Rico, a subsidiary of Connected Nation, Inc., May 2012.

¹¹ *Id.*

2. A description of the technology or technologies that will be used for the broadband service.

T-Mobile Puerto Rico will provide broadband Lifeline service using its advanced high-speed mobile broadband network. T-Mobile USA invested approximately \$2.7 billion in expanding its broadband network in 2011, primarily in expanding deployment of its HSPA+ (4G) network in the United States. T-Mobile USA also recently announced that it would invest an additional \$4 billion to strengthen its nationwide 4G network and deploy long-term evolution (LTE) service. In Puerto Rico, T-Mobile Puerto Rico's broadband deployments include HSPA+ 21 Mbps in 44 municipalities and HSPA+ 42 Mbps in 18 municipalities. In addition, T-Mobile Puerto Rico will be adding LTE technology to its network, which will further expand its broadband capabilities. For the broadband Lifeline project, T-Mobile Puerto Rico will provide broadband service to eligible low-income consumers over its HSPA+42 Mbps network, where available. T-Mobile Puerto Rico makes available mobile broadband service through smartphones, tablets, netbooks, USB modems, and other wireless devices.

3. The broadband speeds for the service offering(s) based on what is advertised by the ETC and if the offered speed is less than the benchmarks identified by the Commission, an explanation of why the speed is less than the benchmarks, and how the speed offered will provide consumers access to key applications involving education (e.g., distance/online learning), healthcare (e.g., remote health monitoring), and person-to-person communications (e.g., online video chat).

Based on internal and independent testing, T-Mobile Puerto Rico expects that its broadband customers will experience data speeds on its network as follows:

- 4G (HSPA+ Dual Carrier/42 UMTS) network: typical download speeds of 4-11 Mbps and upload speeds of 500-1800 Kbps;
- 4G (HSPA+ 21 UMTS) network: typical download speeds of 2-6 Mbps and upload speeds of 500-1800 Kbps; and

- 3G (HSPA UMTS) network: typical download speeds of 400-700 Kbps and upload speeds of 100-250 Kbps.

According to a recent Nielsen Study, T-Mobile Puerto Rico is only one of two mobile carriers offering average speeds higher than 4 Mbps in Puerto Rico.¹² For T-Mobile Puerto Rico’s broadband Lifeline project, participating consumers will have access to the company’s HSPA+42 network, providing typical speeds of greater than 1 MB upload and 4 MB download, which are the preferred speeds for broadband pilot program participants.¹³ These speeds will enable access to most applications required by broadband users.

4. **The amount of the monthly discount, if any, the ETC is seeking for each broadband plan included within the proposed project and the resulting cost to subscribers for the broadband service, the duration of the monthly subsidies the ETC is seeking, and all other terms and conditions of service (the ETC must provide specific details of all of the subsidized broadband offerings it intends to offer subscribers in the pilot project, including the different options of bundled services and/or standalone broadband and offerings with different usage limits or speed).**

T-Mobile Puerto Rico’s proposed broadband project will provide a \$20.00 per month per subscriber discount off of two broadband service offerings:

- (1) Broadband (data only) offering; and
- (2) Smartphone (voice and data) offering.

The pricing options for these two offerings are as follows:

Broadband Offering	Monthly Charge	Lifeline Discount	Net Price for Eligible Consumer	Data Usage (above which speeds to be reduce)	Voice and Text
Broadband Only	\$39.99	\$20.00	\$19.99 (Note 1)	2 GB	None

¹² Nielsen Report, June 2012.

¹³ See *Broadband Lifeline Pilot Public Notice* at 6; see also *USF/ICC Transformation Order*, 26 FCC Rcd at 17702 (establishing broadband speeds for Mobility Fund recipients).

Broadband Offering	Monthly Charge	Lifeline Discount	Net Price for Eligible Consumer	Data Usage (above which speeds to be reduce)	Voice and Text
Broadband Only	\$49.99	\$20.00	\$29.99 (Note 1)	5 GB	None
Broadband Only	\$79.99	\$20.00	\$59.99 (Note 1)	10 GB	None
Smartphone	\$64.99	\$20.00	\$44.99	2GB	Local Unlimited
Smartphone	\$74.99	\$20.00	\$54.99	5 GB	Local Unlimited
Smartphone	\$104.99	\$20.00	\$84.99	10 GB	Local Unlimited

Note 1: If a customer also obtains a rate plan for a smartphone, then the broadband rate would be reduced by an additional \$10.00 per month.

T-Mobile Puerto Rico will sign up customers for its broadband Lifeline service offerings over a three-month period and then will provide discounted service for a period of up to 12 months, provided the customer remains eligible for Lifeline service. The broadband Lifeline service offerings are designed to provide eligible consumers with advanced high-speed broadband service at an affordable price point, ranging from \$9.99 per month to \$84.99 per month, depending upon usage and inclusion of additional voice and text services. Customers will not be subject to overage charges and will not be assessed an early termination fee, unless a customer fails to pay its bill or violates other Terms and Conditions of its participation in the pilot project. Consistent with the company's existing service offerings, customers may experience reduced speeds after certain thresholds. All T-Mobile Puerto Rico customers, including Lifeline customers, pay a \$35 activation fee.

T-Mobile Puerto Rico specifically structured its pilot project to ensure that consumers with a genuine interest in broadband service participate in the project. All Terms and Conditions of service for pilot participants will be similar to the Terms and

Conditions (see <http://www.t-mobilepr.com/>) that apply to T-Mobile Puerto Rico's existing voice telephony Lifeline service offering.

- 5. The amount, if any, of a subsidy the ETC is seeking to reduce or eliminate any non-recurring fees, an explanation of the costs the non-recurring fees are used to cover and the resulting cost to subscribers of any non-recurring fees.**

T-Mobile Puerto Rico has designed its pilot project to eliminate or minimize any potential barriers to eligible low-income consumers' participation in the project. Low-income consumers will have access to the same T-Mobile customer experience as non-Lifeline subscribers. T-Mobile is not seeking a subsidy to cover any non-recurring fees or one-time costs of setting up the pilot project.

- 6. A detailed explanation of how the proposed pilot project will focus on those low-income consumers who do not currently subscribe to broadband.**

Puerto Rico has a very low broadband penetration rate, which is especially pronounced among lower-income consumers. T-Mobile Puerto Rico's broadband pilot project offering will include outreach initiatives aimed at low-income consumers that currently do not have broadband service. Project participants will be required to certify that they currently do not have broadband service in their household.

T-Mobile Puerto Rico will evaluate broadband usage among the following three broadband groups to determine the effectiveness of its broadband Lifeline outreach and service offerings.

1. Broadband Group One: Non-Lifeline customers who obtain broadband service from T-Mobile Puerto Rico.
2. Broadband Group Two: Broadband Lifeline pilot project customers who obtain discounted broadband service at maximum speeds over T-Mobile Puerto Rico's HSPA+42 network.
3. Broadband Group Three: Broadband Lifeline pilot project customers who obtain discounted broadband service at speeds over T-Mobile Puerto Rico's 3G and HSPA+21.

The following is a list of Puerto Rico communities that will participate in T-Mobile Puerto Rico's broadband Lifeline pilot project, demographic information on the population of these communities, the target households that may be eligible for broadband Lifeline service, and T-Mobile Puerto Rico's network providing broadband service in these communities:

	POPs	Households	Median HH Income	Target HH	HSPA+
Aguada	41,959	15,156	\$14,103	3,789	21
Aguadilla	60,949	23,552	\$13,956	5,888	21
Aguas Buenas	28,659	10,040	\$14,751	2,510	21
Aibonito	25,900	9,367	\$15,487	2,342	21
Añasco	29,261	10,942	\$15,244	2,736	21
Arecibo	96,440	36,579	\$16,564	9,145	21
Barceloneta	24,816	9,165	\$16,124	2,291	21
Barranquitas	30,318	10,191	\$14,751	2,548	42
Bayamón	208,116	76,834	\$25,294	19,209	42
Cabo Rojo	50,917	19,816	\$15,809	4,954	21
Caguas	142,893	53,273	\$22,951	13,318	42
Camuy	35,159	12,752	\$14,985	3,188	21
Canóvanas	47,648	16,579	\$21,934	4,145	21
Carolina	176,762	67,192	\$28,262	16,798	42
Cataño	28,140	10,108	\$18,144	2,527	42
Cayey	48,119	17,681	\$19,040	4,420	42
Cidra	43,480	15,135	\$21,293	3,784	21
Coamo	40,512	14,281	\$15,028	3,570	42
Comerio	20,778	7,097	\$12,927	1,774	21
Corozal	37,142	12,446	\$14,077	3,112	42
Dorado	38,165	13,342	\$25,473	3,336	21
Fajardo	36,993	13,922	\$19,803	3,481	42

	POPs	Households	Median HH Income	Target HH	HSPA+
Florida	12,680	4,494	\$16,246	1,124	21
Guánica	19,427	7,223	\$11,870	1,806	21
Guayama	45,362	16,244	\$17,214	4,061	42
Guayanilla	21,581	7,503	\$14,243	1,876	21
Guaynabo	97,924	37,402	\$33,279	9,351	42
Hatillo	41,953	15,386	\$16,246	3,847	42
Hormigueros	17,250	6,821	\$19,834	1,705	21
Humacao	58,466	21,780	\$18,354	5,445	42
Isabela	45,631	17,072	\$13,028	4,268	42
Juana Díaz	50,747	17,252	\$16,496	4,313	21
Juncos	40,290	14,382	\$17,694	3,596	21
Lajas	25,753	9,670	\$14,500	2,418	21
Las Marías	9,881	3,561	\$13,847	890	21
Las Piedras	38,675	14,058	\$17,680	3,515	42
Loíza	30,060	10,130	\$19,460	2,533	21
Luquillo	20,068	7,302	\$19,672	1,826	42
Mayaguez	89,080	35,805	\$14,059	8,951	42
Morovis	32,610	10,859	\$13,646	2,715	21
Naguabo	26,720	9,755	\$15,250	2,439	21
Naranjito	30,402	10,163	\$14,275	2,541	21
Orocovis	23,423	7,812	\$13,713	1,953	21
Patillas	19,277	7,271	\$14,860	1,818	42
Peñuelas	24,282	7,863	\$14,872	1,966	21
Ponce	166,327	60,049	\$16,902	15,012	42
Quebradillas	25,919	9,442	\$11,943	2,361	42
Rincón	15,200	5,998	\$16,067	1,500	21
Río Grande	54,304	18,869	\$20,850	4,717	42
Sabana Grande	25,265	9,372	\$15,497	2,343	21
Salinas	31,078	11,400	\$13,118	2,850	42

	POPs	Households	Median HH Income	Target HH	HSPA+
San Juan	395,326	165,316	\$23,478	41,329	42
San Lorenzo	41,058	14,746	\$17,477	3,687	21
San Sebastián	42,430	16,047	\$12,115	4,012	21
Santa Isabel	23,274	8,225	\$17,605	2,056	42
Toa Alta	74,066	24,515	\$25,133	6,129	42
Toa Baja	89,609	32,617	\$23,297	8,154	21
Trujillo Alto	74,842	26,935	\$30,825	6,734	42
Vega Alta	39,951	13,925	\$16,608	3,481	42
Vega Baja	59,662	21,335	\$16,530	5,334	21
Villalba	26,073	8,373	\$15,455	2,093	21
Yabucoa	37,941	13,507	\$16,894	3,377	42
All Municipalities	3,336,993	1,235,929	\$17,518	308,982	

7. The project’s proposed overall funding amount with details on the number of customers it is estimated to serve, with underlying assumptions.

T-Mobile Puerto Rico projects that its broadband Lifeline project will require funding of \$505,400.00, based upon 2,106 subscribers obtaining broadband Lifeline service for one year at a \$20 per month per subscriber discount.

	Month 1	Month 2	Month 3	Total
Pilot Broadband Customers	554	665	887	2,106
Subsidy Per Month (subscribers times \$20 per month)	\$11,080	\$13,300	\$17,740	
Subsidy for 1 year Pilot	\$132,960	\$159,600	\$212,880	\$505,440

8. A description of how the ETC will market the broadband service offering(s) to low-income consumers (e.g., outreach to existing Lifeline voice subscribers, advertising in newspapers/radio, outreach through community-based organizations), the language(s) in which the ETC will market the service and copies of sample marketing materials if available.

T-Mobile Puerto Rico will market its discounted broadband Lifeline service offerings similar to its marketing initiatives for voice telephony Lifeline service, including mass media through print ads, geographically targeted outdoor advertising, and through targeted direct marketing and short message service (“SMS”). Attached as Exhibit C is a copy of existing Lifeline advertising and outreach used by T-Mobile Puerto Rico for its Lifeline service offerings, along with advertising for its broadband service offerings.

9. A description of what customer service support will be available to subscribers participating in the pilot project.

Broadband Lifeline project customers will have access to the same local, knowledgeable customer care support to which T-Mobile Puerto Rico’s existing Lifeline customers have access. All Lifeline customers – voice telephony customers and broadband pilot participants – will receive T-Mobile Puerto Rico’s customer care support through all available channels such as the company’s Speech Interactive Voice Recognition (SIVR) automated system, 611 Call Center, on-line eCare, and Retail Care locations in Puerto Rico. With the exception of address change requests, all account and equipment related transactions can be addressed through the 611 Call Center and Retail Care support channels.

C. A detailed explanation of how the ETC’s project will address barriers to broadband adoption other than cost, including but not limited to:

1. Whether the ETC’s project will provide digital literacy training and what form that will take.

T-Mobile Puerto Rico has partnered with the educational institution Sistema Universitario Ana G Mendez (“AGM”) to offer discounted broadband service to qualifying households in Puerto Rico. AGM has 13 campuses on the islands that include 41,000 students. AGM will work with T-Mobile Puerto Rico to implement a digital literacy campaign to maximize the use of mobile broadband service for low-income consumers with a focus on educational development.

T-Mobile Puerto Rico also has established in alliance with Centro Para Puerto Rico to provide Mobile Broadband Connectivity for Technological Centers in Special Communities in the East Region of Puerto Rico. In these Technological Centers, the only broadband connectivity is the one currently provided by T-Mobile Puerto Rico. These Community Centers encourage Internet usage within the community. After the project in the East Region launches, T-Mobile Puerto Rico will measure its effectiveness through community involvement and usage to inform rollout of the project through other underprivileged communities throughout the rest of Puerto Rico. Centro para Puerto Rico is a private, nonprofit, nonpartisan organization intended to carryout projects, programs and services that address issues of poverty, the role of women in society, urban revitalization, ethical values and social responsibility.

2. **Whether the project will provide free or discounted hardware, including aircards, modems, laptops (notebooks), tablets, desktops, or other mobile devices, to the subscribers; who will supply and pay for the free or discounted hardware; whether the subscribers will bear any of the cost of the discounted hardware; and the cost the ETC will require the subscriber to pay.**

T-Mobile Puerto Rico will offer data sticks, tablets, laptops, and smart phones with prices ranging from \$0 to \$250. The pricing will depend on the available inventory of data devices, the cost of the devices, and customer preferences and commitments. The following are examples of two data devices currently available and the pricing options:

MBB Devices			
Data Sticks		Routers	
			
Specs	HUA Jet 2.0 4G Provides wireless internet connectivity 4G capable Wi-fi Connection Management Memory Card Slot (microSD)		ZTE 4G Mobile HotSpot 4G capable Wi-fi Sharing Memory Card Slot (microSD)
1YR Contract	\$0.00	1YR Contract	\$39.99
Regular Price	\$99.99	Regular Price	\$179.99

Other data devices and smartphones will be available to broadband Lifeline pilot project customers, based upon the available inventory of customer equipment and the constantly changing equipment options (data devices and smartphones) in the market.

- D. **The name and a description of the qualifications of any individuals or entities the ETC proposes to partner with in designing or implementing the proposed pilot project, and a detailed explanation of the role of the partner(s), if any, including whether they have existing or planned adoption efforts that provide for a more holistic approach to overcoming broadband adoption barriers, including digital literacy, equipment costs, and relevance.**

As previously noted, T-Mobile Puerto Rico has partnered AGM, an institution that encompasses three universities with 13 campuses across the Puerto Rico islands, and

with Centro Para Puerto Rico, a nonprofit organization working to address broadband connectivity in special needs communities.

AGM is an educational institution founded in 1941, certified by the Middle States Association of Colleges & Secondary Schools in 1959. It currently encompasses three universities: Universidad del Turabo, Universidad Metropolitana (“UMET”), and Universidad del Este (“UNE”); with 13 campuses across Puerto Rico. AGM launched Channel 40 (WMTJ-TV), the first educational and privately owned TV station on the Island. On April 2012, AGM started conducting classes through Channel 40 and launched a long distance open education project “Centro de Estudios Televisados” (Center for Televised Studies). AGM’s Channel 40 transmits interactive TV throughout all of Puerto Rico and offers The Educational Resources Center, through an agreement with the government’s Channel 6 and The Corporation for Public Broadcasting. AGM was recently awarded the joint management of the Arecibo Observatory Radio Telescope with SRI International, the Universities Space Research Association and the national Foundation of Sciences. In 2011, AGM inaugurated the 2nd Governors Library *Pedro Rosselló Library* and jointly made an agreement to make available to all the citizens in Puerto Rico more than two million books for free, which can be accessed through their website anytime, anywhere. AGM also founded the Center for Telecommunications and Education at Distance. AGM will help educate low-income consumers on broadband usage, including enabling eligible students to enroll on-line, interact with teachers and access data sources, including digital libraries. Another AGM program is the State Police Tablet Program, where equipment is provided to policemen on the streets to allow them

to collect and share data and increase their productivity and response. The users are trained to use the equipment properly.

- E. A detailed explanation of the design, data gathering and evaluation component of the project, including:**
- 1. All details regarding the design of the project(s), which includes: (a) the planning, execution and analysis of the field experiment with control groups, if applicable; (b) explanation of how the proposed project(s) will inform the Commission concerning the causal impact of the variations on broadband service; (c) if applicable, how the project(s) will apply randomization, i.e. the process of randomly determining how consumers are assigned into control groups; (d) how the project(s) will mitigate any sources of statistical bias, if designed as a field experiment; and (e) how it will obtain sufficient sample size.**
 - 2. Details of how the ETC plans to collect the standardized data that must be submitted to USAC, as described in Appendix, including whether the ETC will seek to have USAC collect that data.**
 - 3. If the ETC plans to collect data from its subscribers in addition to the standardized data that must be collected, as described in Appendix, details of the types of data the ETC plans to collect from its subscribers relating to broadband adoption and how it intends to collect that data.**

T-Mobile Puerto Rico will gather data from the broadband Lifeline pilot project to answer the following question: “What is the most effective and cost efficient way to increase broadband penetration among the qualifying low socio-economic segment of Puerto Rico?” The definition of broadband penetration will not be limited to active devices divided by the population but to the devices needed to have a monthly usage of at least 500 Kbps per month, which will ensure that the target group sees value in the mobile broadband service and utilizes it in their lives.

Some basic variables that T-Mobile Puerto Rico will evaluate as part of the broadband pilot project is the effectiveness of: advertising, messaging, media placement, media mix, on boarding sales process, rate plan pricing and device pricing. At the point of sale, T-Mobile Puerto Rico will capture customer demographic information, the

advertising medium that made the customer aware of the broadband offering, and other information to measure the variables. Usage levels of broadband customers will be monitored to gauge the receptiveness of the technology, sustained usage and value, and broadband relevance to customers' day to day activities. The following is a further explanation of data gathering and evaluation components of the broadband pilot:

Variables to be Measured	What will be measured
a) Advertising	Whether advertising spending has an impact or not on stimulating demand for the broadband Lifeline pilot offering. During the pilot project, a period of time (four weeks) will have full advertising support in TV, print, and direct marketing. A consecutive period (four weeks) will have no advertising support. The impact on sales volume, if any, will be analyzed to determine if advertising had a positive impact on the adoption of broadband service or not and if it did have an impact, to what magnitude. This will lead to conclusions of advertising's role in helping achieve broadband penetration goals and its relative priority among other factors.
b) Messaging / Rate Plan Pricing / Rate Plan Pricing	Different variances of messaging will be tried during the time period of advertising. Messaging will be focused on monthly broadband rate plan, benefits of broadband, specific broadband devices (smartphone, data stick and router), pricing, device variety with variations focusing on pricing. Sales for the days that the particular message was scheduled will be tallied to analyze which message generated more sales volume. A post-analysis on usage, a minimum six weeks after the sale, will be conducted to assess what, if any, particular messaging had an impact on consumers' broadband usage. To more effectively develop the messaging, quantitative research will be conducted to gauge overall impact of specifics on the target group prior to the launch of the program allowing for modifications to increase overall communication effectiveness.

Variables to be Measured	What will be measured
c) Media Placement / Mix	During the advertising period, three different variations will be tried: (1) TV, print advertising scheduled at the same time; (2) TV advertising only; and (3) print advertising only. Sales volume will be measured on the different media placement scenarios as well as the combination of media placement scenarios with different messaging to determine most effective combination.
d) On boarding sales process	Measurements will be taken to gauge the importance of sales representatives educating new customers on broadband use at the time of sale and how it impacts usage of broadband by those customers. One-half of the participating stores will have a script to follow, informing new customers on broadband use, and half the stores will not. A post-analysis on usage, a minimum six weeks after the sale, will be conducted to assess what, if any, particular messaging had an impact on consumers' broadband usage.
e) Demographics	After the initial three-month period is over (Phase One), an analysis will be conducted on overall customers that purchased the product and to what specific demographic groups they belonged. The segments that better responded to the offering by age, gender, geographic area and economic level will be measured. Cross analysis on other variables' effectiveness in particular segments will be conducted.

In addition, T-Mobile Puerto Rico will evaluate the following variables as part of the broadband Lifeline pilot project:

- Advertising and Outreach: Month 1 print ad/mass media message vs. Month 2 direct marketing to existing Lifeline customers vs. Month 3 text messages with broadband offering to existing Lifeline customers.
- Retail Store Fronts: Retail store front advertising with broadband flyers, poster and banners will be evaluated and compared with more targeted Lifeline advertising and outreach.
- Educational Material: Information on the benefits of broadband service will be made available in select areas to compare project take rate and data usage with areas or consumers that are not provided with the educational material.

- **Lifeline Outreach Locations:** Broadband Lifeline outreach material will be provided at government locations and other areas frequented by low-income consumers in specific months to compare take rates based upon targeted outreach initiatives.
- **Broadband Usage:** Broadband customer usage will be evaluated in different geographic areas based upon the availability of highest speed data services – HSPA+42, high speed data services – HSPA+21, and lower speed data services – 3G.

F. A detailed explanation of how the ETC will comply with the Commission’s new rules relating to determinations of subscriber eligibility for Lifeline-supported services by applying all of the consumer eligibility and enrollment procedures as detailed in section VI and Appendix C of the Lifeline Reform Order and FNPRM, and a copy of the ETC’s certification form for enrollment that will be used during the Pilot Program.

T-Mobile Puerto Rico has established a Lifeline application process to meet the requirements of the *Lifeline Reform Order*, and the requirements established in Puerto Rico by the PR TRB.

T-Mobile Puerto Rico’s Lifeline eligibility and verification process includes obtaining the following information from applicants for Lifeline service, based upon the requirements of the PR TRB (for the Commission’s convenience, references to applicable PR TRB rules and T-Mobile’s Terms & Conditions are included below in brackets):

Upfront Lifeline Applicant Disclosures:

- Lifeline service is available for only one wireline or wireless line per household. [PR TRB Rule 14.7(d)]
- The name of the person billed must be the same as the name of the person receiving the benefits. [Terms & Conditions #1]
- Evidence of continued eligibility may be required from time to time. [Terms & Conditions #3]
- Subscriber must certify, when required by T-Mobile, his/her continued eligibility to participate in the Lifeline program. [Terms & Conditions #16]

Applicant Information:

- Name, including mother’s maiden name [PR TRB Rule 14.10]

- Residential and billing address (permanent or temporary or multi-household) [physical address required by PR TRB Rule 14.1(C)]
- Social Security Number [PR TRB – Rule 14.10]

Qualifications for Lifeline Service:

- Certification of participating in qualifying programs or income level. [Required per PR TRB Rule 14.7, or evidence obtained directly from the Puerto Rico government that the person is participating in the nutritional assistance program (PAN) – PR TRB Rule 14.8]
- Review of documentation evidencing participation in qualifying programs or income level at or below 135% of Federal Poverty Guidelines. [The PR TRB determines the income level by Administrative Order and currently uses as reference for Puerto Rico the guidelines for the State of Hawaii. Only certain listed documents are allowed for review (e.g., tax returns, payment stubs) and a certification must also be submitted that such documents represent actual household income – PR TRB Rule 14.1(A).]
- A control code must be obtained from the PR TRB to ensure that duplicate service is not being offered to the same person or household by another ETC. [PR TRB Rule 14.5]
- Applicants that qualify for Lifeline service through the nutritional assistance program and cease their participation in such program are identified through monthly updates obtained from the responsible state agency. [PR TRB Rule 14.8(g)]

Applicant Certifications:

- The information provided in this application is true and correct under penalty of perjury and temporary or permanent suspension of all Lifeline benefits. [PR TRB Rule 14.7(e)]
- I am eligible for Lifeline service through participation in the qualifying program(s) [The program must be specified – PR TRB Rule 14.7(e)] or meeting the income requirements as identified above. For income level qualification: I qualify because I fall below the poverty level pursuant to the Federal Poverty Guidelines, my annual income is \$_____ and there are __ members in my household. [PR TRB Rule 14.1(A).]
- I will inform T-Mobile within five (5) calendar days if I cease my participation in the qualifying program, my income increases or the composition of my household changes. [PR TRB Rules 14.7 (e) and 14.8(c)]
- No one in my household is currently receiving Lifeline service through wireline, wireless or any other future technology. [PR TRB Rules 14.7 (e) and 14.8(c)]
- I acknowledge that the service is subject to certain Terms & Conditions (such Terms & Conditions include a requirement to

periodically recertify eligibility). [Evidence of continued program eligibility is required annually – PR TRB Rules 14.7(e) & 14.8(d).]

- I authorize T-Mobile to release any records (including financial records) required for the administration of the Lifeline service programs.
- I agree to notify my current service provider that I have requested Lifeline service from T-Mobile.

To the extent required based upon the established procedures adopted and approved by the PR TRB, T-Mobile Puerto Rico's Lifeline enrollment process also includes all required Commission disclosures and information, including:

Upfront Lifeline Applicant Disclosures:

- Lifeline is a Federal benefit that is not transferrable to any other person;
- Lifeline service is available for only one line per household. A household cannot receive benefits from multiple providers;
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals living at the same address that share income and expenses; and
- Violation of the one-per household rule is not permitted under federal rules and will result in the subscriber's de-enrollment from the program and possible criminal prosecution by the U.S. Government.

Applicant Information:

- Name
- Residential and billing address (permanent or temporary or multi-household)
- Social Security or Tribal Identification Number

Qualifications for Lifeline Service:

- Certification of participating in qualifying programs or income level
- Review of documentation evidencing participation in qualifying programs or income level at or below 135% of Federal Poverty Guidelines

Applicant Certifications:

- The information provided in this application is true and correct; I acknowledge that willfully providing false or fraudulent information in order to receive Lifeline service is punishable by fine or imprisonment and termination of all Lifeline benefits.
- I am eligible for Lifeline service through participation in the qualifying program(s) or meeting the income requirements as identified above.

- I have provided documentation of eligibility for Lifeline service, unless otherwise specifically exempted from providing such documentation.
- I will inform T-Mobile within 30 days of any potential change in eligibility, including, but not limited to: (i) a move or change of address; (ii) any change in participation in the programs identified above or change in income or household members; (iii) receiving Lifeline service from another provider; or (iv) any other change that would affect my eligibility for Lifeline service.
- I have provided the address where I currently reside and, if a temporary address has been provided, then I acknowledge that T-Mobile may attempt to verify my address every 90 days, and, if I do not respond to verification attempts within 30 days, then my Lifeline service may be terminated.
- No one in my household is currently receiving Lifeline service from any other provider; I acknowledge that Lifeline service is a federal benefit, available for only one line per household; a household is any individual or group of individuals who live together at the same address and share income and expenses; obtaining Lifeline service in violation of the one per household rule is not permitted under federal rules and could result in prosecution by the United States government.
- I acknowledge that I will be required to annually recertify eligibility and may be required to re-certify continued eligibility for Lifeline at any time and failure to re-certify will result in the termination of Lifeline benefits. I agree to notify T-Mobile within five (5) business days if I become ineligible to receive Lifeline assistance.
- I authorize T-Mobile and its agents to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Lifeline service. I authorize government agencies and their authorize representatives to discuss with and/or provide information to T-Mobile and its agents verifying my participation in public assistance programs that qualify me for Lifeline service.
- I authorize T-Mobile to release any records (including financial records) required for the administration of the Lifeline service programs.

To the extent required based upon the established procedures adopted and approved by the PR TRB, T-Mobile Puerto Rico follows all applicable requirements to annually verify the continued eligibility of all of its Lifeline subscribers. In particular, T-Mobile Puerto Rico utilizes procedures to verify an individual's continuing eligibility for both program and income-based criteria consistent with the FCC's requirements in 47

C.F.R. § 54.410(f), which is set forth below (references to PR TRB requirements are again set forth in brackets]:

(f) Annual eligibility re-certification process.

(1) All eligible telecommunications carriers must annually re-certify all subscribers except for subscribers in states where a state Lifeline administrator or other state agency is responsible for re-certification of subscribers' Lifeline eligibility. [The subscriber annually must submit evidence of continued participation in the qualifying program or of meeting the income requirements. PR TRB Rule 14.7(e). However, eligibility of nutritional assistance program recipients is independently verified monthly through a list provided by the responsible state agency. PR TRB Rule 14.8(g)]

(2) In order to re-certify a subscriber's eligibility, an eligible telecommunications carrier must confirm a subscriber's current eligibility to receive Lifeline by:

(i) Querying the appropriate eligibility databases, confirming that the subscriber still meets the program-based eligibility requirements for Lifeline, and documenting the results of that review; or [The PR TRB has the centralized database that is able to check for duplicates. Information from the nutritional assistance program recipients is provided by the responsible agency. T-Mobile Puerto Rico does not directly query these databases in order to re-certify eligibility.]

(ii) Querying the appropriate income databases, confirming that the subscriber continues to meet the income-based eligibility requirements for Lifeline, and documenting the results of that review; or

(iii) Obtaining a signed certification from the subscriber that meets the certification requirements in paragraph (d) of this section. [Instead of a signed certification, evidence of continued participation in qualifying programs or of income eligibility is required by the PR TRB. PR TRB Rules 14.7(e) & 14.8(d). However, T-Mobile Puerto Rico may still require the certification.]

Additionally, T-Mobile Puerto Rico maintains records to document compliance with these requirements and provides the PR TRB with a copy of its Annual Certification and Verification that it submits to the Commission and USAC in which the company certifies that it has completed the eligibility verification described above and that it complies with all requirements related to enrolling consumers who qualify for Lifeline service.

G. A description of how the ETC will transition its broadband subscribers at the conclusion of the ETC's project once the discount has ended and any copies of any notices that the ETC would send to its subscribers explaining this transition.

Broadband Lifeline pilot project customers will be required to participate in the pilot project for a full year, subject to any change in their eligibility. Approximately 30 days prior to the end of the one year pilot project, customers will receive a letter by mail stating that they will no longer receive a monthly broadband Lifeline discount and that they will have an opportunity to continue to receive broadband service at a non-discounted rate or terminate service at no charge.

H. If the ETC and its partners intend to submit a final report to supplement the information collected on the Low-Income Broadband Pilot Program Reporting Form, a general description of the types of analysis that will be included in the final report submitted to the Commission at the end of the program. The description should include hypotheses tested and how the analysis addresses the goal of identifying effective approaches to increasing low-income broadband adoption and retention. The description may also explain how, once the study is complete, the costs of converting a non-adopter to adopter will be calculated and presented in the report.

T-Mobile Puerto Rico and its broadband pilot project customers will submit all of the information requested in the Low Income Broadband Pilot Program Reform Form attached to the *Broadband Lifeline Pilot Public Notice*. In addition, T-Mobile Puerto Rico will also provide a final report on its overall experiences, data gathered, and other information obtained during the pilot. The final report will also include the following information on the hypotheses tested and how the analysis addresses the goal of identifying effective approaches to increasing low-income broadband adoption and retention:

1) T-Mobile Puerto Rico believes that the pilot project will prove that demand for mobile broadband in the lower economic strata in Puerto Rico has a strong

correlation to access price point; therefore a decrease of 20% to 30% in access price point will accelerate broadband penetration growth more than the current segment growth. Given the large percentage of this segment among the Puerto Rico population and the relative high reach that mass media has in Puerto Rico, a mass media communication campaign will be most effective in reaching and stimulating demand from this target group. As evidence of access price point's impact on broadband adoption, the adoption rate of mobile broadband among this target group will be compared with mobile broadband adoption prior to the pilot when pricing access was higher. The impact of mass media will be measured through intervals of time when mass media communication will be used to communicate mobile broadband offering pricing and benefits of use in comparison with time intervals when no mass media communication will be used. As the analysis is completed and the variables determining the most effective way to increase broadband penetration and use are determined, a forecast model will be developed to determine based on the theoretical best combination of variables used on an annual basis, what would be the total cost in federal subsidies and what it would yield in incremental broadband penetration.

2) The partnership with AGM educational institution in the pilot project is intended to prove how mobile Internet facilitates and enhances the educational process by providing access to the enrollment process, communication between staff and students and access to the institution's digital library remotely via mobile broadband by qualifying students. The increase in adoption of mobile broadband by students follows the same premise that a price access point reduction will accelerate such adoption and use. The usage of the students for the intended educational purposes will be measured by

analyzing the amount of virtual enrollment applications and virtual student professor interactions before and after the pilot project was concluded. Students will be asked the amount of material that they retrieved from the virtual library before and after the pilot project and the results will be tabulated. The results will indicate not only the increase in penetration among the student body, but more importantly, the increase in usage and effectiveness of mobile broadband to facilitate the learning process among students from low income households.

3) The partnership with Centro para Puerto Rico in the pilot project intends to prove the effectiveness in mobile broadband use in improving the commercial opportunities of low-income women. This will be demonstrated by comparing the group of participants in the institution that are provided mobile broadband access with the group of participants in the institution that are not and the project organizers will submit an opinion analysis on the role that mobile broadband played in facilitating the business ventures of participants and if it was a considerable advantage versus those that did not have access to it.

II. CERTIFICATIONS

Attached as Exhibit D is T-Mobile Puerto Rico's certifications, executed by an officer of the company, under penalty of perjury, that: (i) it intends to offer broadband service pursuant to the Commission's rules and regulations for the Lifeline program; (ii) it will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the pilot program, including, but not limited to procedures that the ETC will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures the carrier undertakes to de-enroll subscribers receiving more than one broadband discount per household; (iii) its broadband service

offering(s) will provide sufficiently low latency to enable use of real-time applications and if there are usage limits for each plan, that they are reasonably comparable to usage limits for comparable broadband offerings in urban areas; and (iv) it will participate in the collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting, and submission requirements, and that it will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumers' adoption of broadband services.

III. ANTI-DRUG ABUSE CERTIFICATION

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

IV. CONCLUSION

As demonstrated herein, T-Mobile Puerto Rico's application for participation in the Pilot Program will greatly benefit the Commission in its efforts to establish a Lifeline program to make broadband service available to eligible low-income consumers, especially those residing in the Commonwealth of Puerto Rico. T-Mobile Puerto Rico respectfully requests that the Commission approve its broadband Lifeline pilot project application.

Respectfully submitted,

T-MOBILE PUERTO RICO, LLC

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