

August 15, 2012

VIA ELECTRONIC FILING

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

Re: T-Mobile Puerto Rico, LLC Application To Participate in the Broadband Adoption Lifeline Pilot Program; WC Docket No. 11-42

Dear Ms. Dortch:

At the Commission's request, T-Mobile Puerto Rico, LLC ("T-Mobile") joined a telephone conference with Commission staff on August 2, 2012 to discuss its Application to Participate in the Broadband Adoption Lifeline Pilot Program ("Broadband Pilot Application"). Kimberly Scardino, Deputy Division Chief of the Telecommunications Access Policy Division ("TAPD") of the Wireline Competition Bureau, and Jay Schwarz, Industry Economist for the TAPD, joined the call from the Commission. Representing T-Mobile on the call were Indra Chalk, Liza M. Rios-Morales, Jorge Martel, and Gene DeJordy.

The T-Mobile representatives discussed (i) the company's plans for advertising and outreach to Lifeline eligible consumers, (ii) pilot participants' consent to participate in the broadband pilot program, (iii) availability of data devices for pilot participants, and (iv) the involvement of third party partners in the broadband pilot. The Commission staff requested clarification on the following points:

1. **Advertising and Outreach:** T-Mobile will use, among other media outlets, television advertising, which reaches approximately 99 percent (99%) of the population of Puerto Rico, to inform consumers of their ability to participate in the broadband pilot. This effort will be conducted in Spanish.

T-Mobile will also use text messaging ("SMS") to inform existing subscribers of the broadband pilot program. The SMS messages will be sent to the Lifeline customer base using different variables to measure effectiveness. Two messages, each with different wording, will be sent to separate Lifeline customer groups. Responses from each message will be analyzed to determine if differences in SMS verbiage leads to different responses and broadband adoption rates. A control group will be established within the Lifeline customer base, the members of which will receive no SMS messages. T-Mobile will analyze customer response by the control group versus the rest of the Lifeline customer base that receives the SMS messages. This will lead to a conclusion as to whether SMS messaging impacts responses, sales and broadband adoption.

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T-Mobile will also compare customer response and take rates for broadband service in retail locations with Lifeline-trained sales representatives who explain mobile broadband benefits to customers during the sales process versus retail locations that do not have Lifeline-trained sales representatives that can explain the benefits of mobile broadband in the sales process. Currently, T-Mobile makes available dedicated Lifeline Service representatives in 10 out of 39 retail locations across Puerto Rico. T-Mobile will divide the Lifeline customer service locations, so that five locations receive thorough training on the broadband Lifeline service as well as a script on mobile broadband benefits that sales representatives will go over with customers as part of the sales process. The other five locations will receive only basic information on the broadband Lifeline offering and will not have their sale representatives go through a script during the sales process.

2. **Broadband Pilot Participants' Consent:** T-Mobile will obtain the written consent of eligible consumers participating in the broadband pilot.

3. **Availability of Data Devices:** T-Mobile will make available data sticks, routers, and smartphones for the broadband pilot. In particular, the data sticks, routers and smartphones available for pilot participants will, at a minimum, include the devices identified in Exhibit A.

4. **Third Party Partners:** The role of Sistema Universitario Ana G Mendez ("AGM") in the pilot will be to provide access to its 41,000 students, 90% of whom are low income. AGM will work together with T-Mobile to make the enrollment process more accessible and provide more access points to AGM's Professor/Student Black Board Educational Platform. Currently, AGM offers Online and Telephone Enrollment Alternatives. T-Mobile will help AGM make its online page suitable for mobile viewing, as it is currently a challenge to complete the enrollment process through mobile phones and tablets. T-Mobile will also help AGM develop a mobile application for the enrollment process, downloadable for all mobile operating systems (Android, Windows, Blackberry and iOS), that will make the enrollment process easy and accessible from any mobile device. AGM will measure its success by comparing the amount of online enrollments before and after the launch of the pilot program. AGM will provide measurement statistics and results of the pilot program in terms of increase in online and mobile enrollment and Black Board interactions.

Please feel free to call me with any questions.

Respectfully submitted,

/s/ Liza M. Rios-Morales
Liza M. Rios-Morales

Attachment

cc (via email): Kimberly Scardino
Jay Schwarz

Smartphones		
	<p>Huawei Prism</p> 	<p>Huawei myTouch</p> 
<p>1YR Contract Full Price</p>	<p>\$0.00 \$140.00</p>	<p>\$79.99 \$207.00</p>
Mobile Broadband Device		
	<p>ZTE Rocket 2.0</p> 	<p>ZTE Rocket 3.0</p> 
<p>Data Sticks</p>		
<p>1YR Contract Full Price</p>	<p>\$0.00 \$129.99</p>	<p>\$29.99 \$149.99</p>
	<p>ZTE 4G Mobile HotSpot</p> 	<p>HUA WEI Sonic</p> 
<p>Routers</p>		
<p>1YR Contract Full Price</p>	<p>\$49.99 \$179.99</p>	<p>\$79.99 \$199.99</p>