



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Mark R. Herring
Attorney General

202 North Ninth Street
Richmond, Virginia 23219
804-786-2071
FAX 804-225-4378

February 4, 2021

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Verizon – TracFone Transaction - Availability of Lifeline Services to Low-Income Consumers - File No. ITC-T/C-20200930-00173

We, the undersigned Attorneys General, write to urge you to request additional information from Verizon and TracFone in order to adequately review the impacts of this proposed acquisition. The Federal Communications Commission (FCC) rightly denied the Applicants' attempt to streamline the application process; however, the Applicants have failed to answer numerous legitimate consumer protection and equity issues since their initial application. The FCC should examine whether the acquisition of TracFone by Verizon could significantly reduce millions of Americans' access to affordable communications services. It is imperative that the FCC thoroughly vet the proposed transaction and impose specific conditions that protect and ensure the public interest before considering approval.

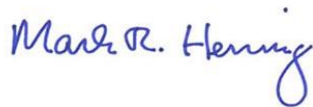
Of particular concern is Lifeline. Lifeline plays a vital role in our economy by providing essential communications services to millions of low-income Americans. TracFone is one of the largest providers of Lifeline services with approximately 1.7 million low-income subscribers in 43 states and the District of Columbia. By contrast, Verizon only offers its mobile services to Lifeline customers in parts of four states. The potential for Verizon to pursue additional profits by reducing the access and/or quality of Lifeline services could shut out millions of low-income Americans from adequate communications services. Considering the fundamental role that cellular telephones play in accessing modern society and the modern economy, it is imperative that Lifeline services be protected and maintained if this transaction is approved.

We urge the FCC to adopt specific conditions that protect the ability of Lifeline customers to use that vital service and protect customers in the Mobile Virtual Network Operator (MVNO) marketplace. These conditions include, but are not limited to, a commitment by Verizon to provide Lifeline services to customers at an affordable rate and at a quality that is commensurate with modern standards or require that Verizon offer for a period of years, Lifeline service packages that are at least commensurate with, if not more consumer friendly than, TracFone's existing lowest-cost Lifeline packages.

Furthermore, a vertical merger of the leading Mobile Network Operator (MNO), and the leading Mobile Virtual Network Operator in an already concentrated mobile wireless market would see the last significant MVNO integrated into a national facilities-based provider. If this resulted in a decrease in the number or quality of Lifeline offerings, that could be contrary to the public interest and could have an adverse impact on consumers and the communications industry.

We appreciate the FCC's cautious approach to such a potentially consequential acquisition. We urge the FCC to continue this approach in requesting additional information from Verizon and TracFone and ensuring that specific conditions are adopted to protect access to Lifeline services and potential harms in the MVNO marketplace. We look forward to your response to this letter and working with you to achieve these goals.

Sincerely,



Mark R. Herring
Attorney General of Virginia



Aaron D. Ford
Attorney General of Nevada



Peter Neronha
Attorney General of Rhode Island



Ellen F. Rosenblum
Attorney General of Oregon



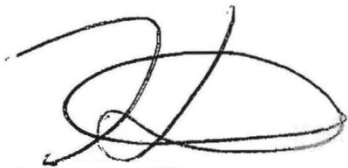
Keith Ellison
Attorney General of Minnesota



Kathy Jennings
Attorney General of Delaware



William Tong
Attorney General of Connecticut



Karl A. Racine
Attorney General for the District of Columbia



Letitia James
Attorney General of New York



Dana Nessel
Michigan Attorney General



Bob Ferguson
Washington State Attorney General



Maura Healey
Massachusetts Attorney General



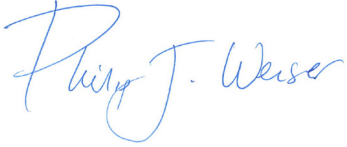
Tom Miller
Attorney General of Iowa



Thomas J. Donovan, Jr.
Vermont Attorney General



Josh Stein
North Carolina Attorney General



Philip Weiser
Colorado Attorney General



Hector Balderas
New Mexico Attorney General