

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

In the Matter of

Virgin Mobile USA, L.P.

Application for Limited Designation as an
Eligible Telecommunications Carrier.

Docket No. 14 – 0475

**VIRGIN MOBILE USA, L.P.’s RESPONSE TO STAFF’S FOURTH SET OF
DATA REQUESTS**

Virgin Mobile USA, L.P. (“Virgin Mobile”) hereby submits the attached response to
Staff’s Fourth Set of Discovery.

**VIRGIN MOBILE USA, L.P.'s RESPONSE TO STAFF'S FOURTH SET OF
DATA REQUESTS**

JZ 4.01 Is 542 Knox Rd 400 N, Abingdon, IL (southwest of the intersection of Knox Rd 400 N and Knox Rd 550 E) within or outside of the proposed Virgin Mobile ETC service area?

Response: The 542 Knox Rd 400 N, Abingdon, IL address does not fall within the proposed ETC service area of Virgin Mobile USA, L.P. d/b/a Assurance Wireless ("Virgin Mobile").

Name: James R. Burt

Title: Director - Policy

Number: 913-315-9384

**VIRGIN MOBILE USA, L.P.'s RESPONSE TO STAFF'S FOURTH SET OF
DATA REQUESTS**

JZ 4.02 Please explain how, based upon the information included in the record of this proceeding, one could determine if 542 Knox Rd 400 N, Abingdon, IL is within Virgin Mobile's ETC service area.

Response: A consumer can determine whether the 542 Knox Rd 400 N, Abingdon, IL address falls within Virgin Mobile's proposed ETC service area by using the address and the Abingdon exchange map, included in Virgin Mobile's Amended Exhibit 2.2. According to the scale on the Abingdon exchange map, Virgin Mobile's proposed ETC service area (reflected by the green portion on the map) begins at one-quarter mile west of Knox Road 550 E on Knox Rd 400 N. The 542 Knox Rd 400 N, Abingdon, IL address is located less than one-quarter mile west of Knox Road 550 E. The 542 Knox Rd 400 N, Abingdon, IL address is therefore outside Virgin Mobile's proposed ETC service area.

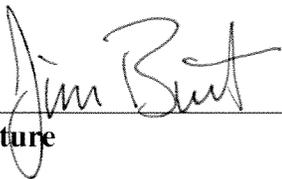
Name: James R. Burt

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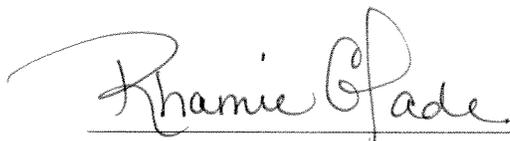
VERIFICATION

I, James R. Burt, being first duly sworn on oath, deposes and states that I have read the responses of Virgin Mobile USA, L.P. to Data Requests JZ 4.01 through JZ 4.02 and the answer made therein is true, correct and complete to the best of my knowledge and belief.



Signature

SUBSCRIBED AND SWORN to before me this 16th day of December 2014.



NOTARY PUBLIC

