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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

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**IN THE MATTER OF THE FILING OF  
TRACFONE WIRELESS, INC.'S  
PETITION FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE STATE OF SOUTH  
DAKOTA FOR THE LIMITED  
PURPOSE OF PROVIDING LIFELINE  
SERVICE TO QUALIFYING  
CUSTOMERS**

**Docket No. TC24-005**

**TRACFONE WIRELESS, INC.'S RESPONSE TO THIRD DATA REQUEST OF  
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF**

Verizon Value, Inc. (Verizon Value or the Company), formerly known as TracFone Wireless, Inc., provides the following response to the third data request of the South Dakota Public Utilities Commission (Commission) Staff issued on April 29, 2025.<sup>1</sup>

Dated: May 29, 2025

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<sup>1</sup> On May 27, 2025, the Company filed a Supplement in this docket advising the Commission that its corporate name had changed from TracFone Wireless, Inc. to Verizon Value, Inc. effective April 7, 2025.

## **RESPONSE TO THIRD DATA REQUEST**

- 3-1.** Refer to Staff's Data Request 1-25 and TracFone's response. Since October 15, 2024, have TracFone or its various brands been investigated or penalized for any sort of waste, fraud, or abuse of the Lifeline program?

### **Response**

No.

- 3-2.** Would TracFone commit to notifying the SD PUC if TracFone ever becomes aware that it is under investigation, or has been penalized, for any sort of waste, fraud, or abuse of the Lifeline program?

### **Response**

Verizon Value would commit to notifying the Commission if it has been penalized for waste, fraud, or abuse of the Lifeline program. However, Verizon Value would not agree to notifying the Commission about investigations regarding the Lifeline program. Investigations are often exploratory and confidential, and can remain pending for many years despite being dormant. Furthermore, the precise focus of investigations is often unknown and may never lead to an enforcement action. Verizon Value would be willing to notify the Commission if an investigation related to the Lifeline program leads to the issuance of a public document, such as a Consent Decree, Notice of Apparent Liability, or Forfeiture Order issued by the Federal Communications Commission. Notifying the Commission of those types of documents would provide the Commission with relevant information without requiring Verizon Value to disclose investigations that do not result in any finding of wrongdoing.

## DECLARATION

I, Stephen Athanson, state that I am Counsel for Verizon Value, Inc., formerly known as TracFone Wireless, Inc. (“Verizon Value”); that I am authorized to make this Declaration on behalf of Verizon Value; that I have read the foregoing document; and that the statements in the foregoing document with respect to Verizon Value are true and accurate to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Date: May 29, 2025

Signed by:  
  
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Stephen Athanson