

February 23, 2010

VIA OVERNIGHT AND ELECTRONIC MAIL

Ms. Catrice C. Williams, Secretary
Massachusetts Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110

Re: TracFone Wireless, Inc. Annual Verification of SafeLink Wireless® Lifeline
Subscribers, D.T.C. 09-9

Dear Ms. Williams:

Enclosed please find an original and three copies of TracFone Wireless, Inc.'s Motion for Extension of Time. Please contact me if you have any questions regarding this filing.

Sincerely,



Debra McGuire Mercer

Counsel for TracFone Wireless, Inc.

Enclosures

cc via electronic mail:

Alison Lackey
Betsy Whittey
Kajal Chattopadhyay
Michael Isenberg
Armine Simonyan
Michael Mael
Charles Harak
John Breyault

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

TRACFONE WIRELESS, INC.)	
Annual Verification of SafeLink Wireless)	D.T.C. 09-9
Lifeline Subscribers)	
)	

MOTION FOR EXTENSION OF TIME

TracFone Wireless, Inc. ("TracFone"), by its counsel, hereby files this Motion for Extension of Time in accordance with 220 CMR 1.0(5). By this Motion, TracFone requests an extension of time, until March 3, 2010 to file its responses to the First Set of Information Requests of the Department of Telecommunications and Cable.

On February 9, 2010, the Hearing Officer issued a Procedural Notice setting a schedule for this proceeding. Pursuant to the Procedural Notice, TracFone's responses to the first set of information requests are due February 23, 2010. TracFone learned today that the TracFone personnel with personal knowledge regarding the requests are not available to review and approve the responses until later this week. Given that there are 38 questions, most of which have multiple sub-parts, TracFone personnel require additional time to ensure that each response is complete and accurate. TracFone recognizes the importance of providing responses to the Department's questions and is working diligently to provide those responses. TracFone requests that the Department extend the date for filing responses to March 3, 2010. The Procedural Notice requires the Department to serve a second set of information requests on TracFone by March 16, 2010. Therefore, TracFone's filing of its responses to the first set of data requests will not delay this proceeding.

Based on the foregoing, good cause exists for an extension of time to file responses to the first set of information requests.

Respectfully submitted,



Mitchell F. Brecher
Debra McGuire Mercer
GREENBERG TRAURIG, LLP
2101 L Street, NW
Suite 1000
Washington, D.C. 20037
(202) 331-3100

Counsel for TracFone Wireless, Inc.

February 23, 2010

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing TracFone Wireless, Inc.'s Motion for Extension of Time was served electronically to the persons listed below, on this 23rd day of February, 2010.

Catrice C. Williams, Department Secretary
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8287
Email: catrice.williams@state.ma.us
Dtc.efiling@state.ma.us

Alison Lackey, Hearing Officer
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8253
Email: Alison.lackey@state.ma.us

Betsy Whittey, Hearing Officer
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8285
Email: betsy.whittey@state.ma.us

Kajal Chattopadhyay, Acting General
Counsel
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8254
Email: Kajal.chattopadhyay@state.ma.us

Michael Isenberg, Director, Competition
Division
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8265
Email: mike.isenberg@state.ma.us

Armine Simonyan, Telecom Analyst
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8279
Email: armine.simonyan@state.ma.us

Michael Mael, Telecom Analyst
Department of Telecommunications and
Cable
Two South Station, 4th Floor
Boston Ma, 02110
Tel: 617-305-3580
Fax: 617-988-8269
Email: michael.mael@state.ma.us

Charles Harak, Esq.
7 Winthrop Square, 4th Floor
Boston, MA 02110-1245
Tel: (617) 542-8010
Email: charak@nclc.org

John Breyault
National Consumers League
1701 K Street, NW, Suite 1200
Washington, D.C. 20006
Tel: (202) 835-3323
Email: johnb@nclnet.org

/s/ Raymond Lee