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July 31, 2009

By Electronic Mail and Overnight Mail

David Danner
Executive Director and Secretary,
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: AT&T Mobility (f/k/a Cingular) Annual Eligible Telecommunications Carrier Report for 2008 and Future Annual Plan

Dear Mr. Danner:

Enclosed for filing please find AT&T Mobility's Annual Eligible Telecommunications Carrier Report for 2008 and Future Annual Plan ("Report") pursuant to WAC 480-123-060 and WAC 480-123-070. AT&T Mobility's Report contains certain confidential and proprietary information for which AT&T Mobility seeks confidential treatment pursuant to RCW 80.04.095. Consistent with Commission practice, AT&T Mobility has specifically designated the information that is confidential and provided both the complete responses – printed on yellow paper, marked "CONFIDENTIAL" and enclosed in a separate envelope marked "CONFIDENTIAL pursuant to RCW 80.04.095" – and a public response from which the confidential information has been redacted.

Please contact me if you have any questions about the Report.

Manheim
By Ey W/ Permission

Sincerely,

Cindy J. Manheim

Enclosures

PUBLIC VERSION

AT&T Mobility (f/k/a Cingular Wireless) Annual Eligible Telecommunications Carrier Report for 2008 and Future Annual Plan

Bellingham Cellular Partnership; Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company; New Cingular Wireless PCS, LLC; and, Olympia Cellular Telephone Company (collectively "AT&T Mobility" f/k/a Cingular) submits AT&T Mobility's Annual Eligible Telecommunications Carrier Report for 2008 and Annual Plan for 2010¹ for future expenditures in accordance with the rules that apply to Eligible Telecommunications Carriers ("ETCs").

I. AT&T Mobility ETC Report for 2008

A. Annual Certification of Eligible Telecommunications Carriers

With this filing AT&T Mobility is requesting continued certification as an ETC in the state of Washington. In accordance with WAC 480-123-060, AT&T Mobility provides a certification in **Exhibit A** that it will use the federal universal service support for the "provision, maintenance, and upgrading of facilities and services for which the support is intended".

B. Report as Required by WAC 480-123-070 for Calendar Year 2008

1. Report on use of federal universal service funds and benefits to consumers (WAC 480-123-070(1)(a) and (b))

Attached hereto as <u>Confidential Exhibit B</u> please find information on AT&T Mobility's use of the federal universal service funds received in 2008. It should be noted that AT&T Mobility only received federal universal service funds for the first few months of 2008 and did not receive any support for the remainder of 2008 to correct for an error in the previous distribution of Interstate Access Support ("IAS") funding to AT&T Mobility.²

¹ As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner for its annual plan.

² CETCs, like AT&T Mobility, are required to report line counts by UNE zone and customer class in the quarterly Form 525 filings made to USAC. In order to file accurate line counts per UNE zone, AT&T contacted USAC to receive information to associate wire centers with UNE zones. In the first part of 2008, it was discovered that the UNE zone file that AT&T Mobility had previously received from USAC was corrupt in that it did not reflect a UNE zone change in the Washington Verizon study area that affected over 90 of Verizon's wire centers. As a result of the error in the file that USAC transmitted to AT&T Mobility, AT&T Mobility received approximately 34 million dollars in overpayment. USAC agreed that for the State of Washington it would reduce the disbursements that AT&T Mobility would otherwise receive to zero dollars (\$0) each month until the approximately 34 million dollar IAS overpayment had been recovered. AT&T Mobility estimates that it will receive zero dollars in federal universal service support through the end of 2009.

In calendar year 2008, the federal high-cost support received by AT&T Mobility did not include a reduction for the *Dobson ETC Cap* which has not yet been implemented by USAC.³ AT&T Mobility anticipates that it will be required to return some of the federal high-cost support that it received in 2008 to USAC when the *Dobson ETC Cap* is finally implemented.

2. Local Service Outage Reports (WAC 480-123-070(2))

AT&T Mobility's local service outage report for calendar year 2008 is attached hereto as **Confidential Exhibit C**. The report includes information on every outage affecting the supported services that was thirty minutes or longer in during and includes: (a) date and time of onset and duration; (b) description of the outage; (c) particular services affected; (d) geographic area affected; (e) steps taken to prevent a similar situation in the future; and (f) estimated number of customers affected. The information requested for this report is broad and very inclusive such that it includes outages of minimal, if any, impact to consumers. For example, the report would include a situation where a single sector of a cell site was not available for thirty minutes even though customers would not have noticed a disruption in service.

It should be noted that due to system limitations the information provided in this report is for the entire state of Washington and not just the areas in which AT&T Mobility is designated as an ETC.

3. Report on failure to provide service (WAC 480-123-070(3))

AT&T Mobility's report on the number of requests for service within it designated area that were unfulfilled for calendar year 2008 are included in **Confidential Exhibit D**. The Exhibit also describers in detail how AT&T Mobility attempted to provide service to those applicants. The standard that AT&T Mobility is employing for this requirements is the same as that which the Federal Communication Commission ("FCC") adopted in 47 C.F.R. §54.202(a)(1)(B).

³ In the FCC Dobson Merger Approval, an interim cap was set on AT&T Mobility for ETC receipts that was "twelve times the level of support that AT&T Mobility and Dobson collectively were eligible to receive as competitive ETCs for the month of June 2007." See *In the Matter of Applications of AT&T Inc., and Dobson Communications Corporation, For Consent to Transfer Control of Licenses and Authorizations, File Nos.* 0003092368 et al, WT Docket No. 07-13, para. 71. AT&T refers to this as the "Dobson ETC Cap" and this cap was in effect from November 15, 2007 to August 1, 2008, when the industry-wide interim cap went into effect. Unlike the industry-wide interim cap, the Dobson ETC Cap was to be applied on a national basis. USAC has never implemented the Dobson ETC Cap; however, AT&T anticipates that it will do so and at that time AT&T Mobility will have to return some of the ETC support that it received in Washington in 2008.

4. Report on complaints per 1,000 handset/lines (WAC 480-123-070(4))

AT&T Mobility's report with the separate totals for the numbers of complaints from customers in Washington made to the FCC or the consumer protection division of the office of the attorney general of Washington is attached hereto as **Confidential Exhibit E**. This exhibit also generally describes the nature of the complaint and AT&T Mobility's efforts to resolve the matter.

It should be noted that due to system limitations the information provided in this report is for the entire state of Washington and not just the areas in which AT&T Mobility is designated as an ETC.

5. Compliance with applicable service quality standards (WAC 480-123-070(5))

For wireless carriers the rule require a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service ("Code"). On an annual basis AT&T Mobility completes a certification process with CTIA. For 2008, AT&T certified to CTIA that it had adopted the principals, disclosures and practices set forth in the CTIA Code. Included in **Exhibit A** is AT&T Mobility's certification of substantial compliance with this requirement.

6. Certification of the ability to function in emergency situations (WAC 480-123-070(6))

To comply with this requirement an ETC must certify that it has adhered to the requirements in WAC 480-123-030(1)(g). WAC 480-123-030(1)(g) requires wireless providers that are ETCs to have "four hours of back up battery power at each cell site, back up generators at each microwave hub, and at least five hours back up battery power and back up generators at each switch." AT&T Mobility complies with the backup power requirement for its switches and microwave hubs within its ETC designated area.

With respect to the requirement regarding four hours of battery backup at all cell sites, on July 31, 2006 AT&T Mobility submitted a permanent waiver of the obligation to comply with this requirement. In response to this request, on February 15, 2007, the Commission issued Order 01 (Docket UT-063060) which required AT&T Mobility to have within two years of the Order four hours of backup power at its Priority and Coverage cell sites within its ETC designated area using a reliable alternate power sources (battery, fixed generators or fuel cells). On March 6, 2009, AT&T Mobility submitted a Compliance Report and Request for Limited Extension of Partial Exemption ("Report"). As stated in the Report, AT&T upgraded to four hours of backup power all except three of its Priority and Coverage cell sites within it ETC designated area. For the three cell sites, AT&T Mobility has requested a one year extension to complete the upgrade to these three cell site and work is underway to meet this deadline.

⁴ See Cingular's Request for Permanent Waiver or in the Alternate a Temporary Waiver of WAC 480-123-070(6) Regarding Eligible Telecommunications Carrier Requirements, Docket UT-063060; Compliance Report and Request for Limited Extension of Partial Exemption.

AT&T Mobility will be filing shortly a request for clarification of Order 01 in Docket UT-063060 or in the alternate to grant AT&T Mobility an extension until July 1, 2012 to install 4-hours of backup power at its remaining cell sites within its ETC designated area.

7. Advertising certification, including advertisements on Indian reservations (WAC 480-123-070(7).

AT&T Mobility is committed to publicizing the availability of its Lifeline Service in a manner that is reasonably designed to reach those likely to qualify for the service. In that regard, AT&T Mobility engaged in the activities listed below in 2008 to support its Lifeline Service program. AT&T Mobility continues to look for methods to improve its outreach activities and to partner with government agencies to increase the effectiveness of its outreach activities. The certification for this section is included in **Exhibit A**.

- Maintained a dedicated, bi-lingual Lifeline Customer Care team supporting Lifeline Service activations, customer service, and other Lifeline customers support needs through the following toll free number, 800-377-9450;
- Produced Lifeline brochures in English and Spanish with information about the company's Lifeline and Link Up offering, including pricing information and eligibility criteria. Enclosed as <u>Exhibit F</u> is an example of AT&T Mobility's Lifeline brochure that was in circulation in 2008;
- Maintained a dedicated Lifeline Web site (<u>www.wireless.att.com/about/community-support/index.jsp</u>) with information about the offer and includes applications available for downloading;
- Continued advertising in newspapers to publicize the availability of the Lifeline offering, a copy of AT&T Mobility's Lifeline advertisement in 2008 is attached as <u>Exhibit G</u> and information on the publications is attached as <u>Exhibit H</u>.
- Printed and distributed to various agencies listed in <u>Exhibit I</u> the AT&T Mobility Lifeline self-mailer/outreach packets in Spanish and English, which included a Lifeline brochure, application and self-addressed return envelope;
- Distributed self-mailer packets to all AT&T Mobility owned retail locations within our ETC designated area;
- Partnered with United Way to support the communications and publicity of its Lifeline Program. AT&T Mobility has its Lifeline information on the 2-1-1 United Way Infolink which provides up to date resources to people in need in the community;
- Continued its monthly direct mail campaign in its ETC designated area to publicize the availability of the offering to targeted households below the poverty line or on government assistance based on census info obtained by AT&T Mobility. Attached as Exhibit J is the postcard that was created for Washington; and,

■ Mailed letters to the federally recognized Indian tribes across the state asking for their support with publicizing the availability of its Lifeline Service. Attached as **Exhibit K** is a list of the Indian tribes to which AT&T Mobility sent letters.

II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080 for October 1, 2009 through September 30, 2010

Attached as <u>Confidential Exhibit L</u> is AT&T Mobility's projected receipt of ETC funds and use of those funds for October 1, 2009 through December 30, 2010 based on its current projection of the ETC funds that it will receive during that time period. As noted in section I.B.1 above, AT&T Mobility does not anticipate receiving any federal universal service funds through the end of 2009 to correct for an error in the previous distribution of IAS funding to AT&T Mobility

As the Commission is aware, the amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC and the number of AT&T subscribers that have service in a particular wire center. In addition, there are a number of matters currently pending before the Federal Communications Commission ("FCC") that, if adopted, could greatly impact the amount of funding available for Competitive ETCs ("CETCs"). If the federal high cost support that AT&T Mobility receives is less than it current anticipates, AT&T Mobility may reduce or eliminate some projects included in its plan for 2010.

AT&T Mobility is committed to spending the federal high cost support that it receives for the provision, maintenance and upgrading of services and facilities for which the support is intended. As there is often a long lead time for capital projects, if for some reason AT&T Mobility receives more federal high cost support in 2010 than is currently anticipated, AT&T Mobility will spend this support in the following calendar year.

In addition to the variability in federal high cost support received, AT&T Mobility further notes that there may be factors outside of its control that cause a delay to a project listed in the plan for 2010, such as zoning/permitting issues, lease negotiations, back-order of equipment and so forth. Unfortunately, these delays may cause a project to be moved to a subsequent calendar year for completion.

Exhibit A

AT&T MOBILITY LLC ANNUAL CERTIFICATION July 2009

I, Michael C. Maxwell, being of lawful age and duly sworn, state that I serve as Vice President and General Manager for the Pacific Northwest market for AT&T Mobility LLC, and its subsidiaries Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; New Cingular Wireless PCS, LLC; and Olympia Cellular Telephone Company, Inc. (collectively, "AT&T Mobility", f/k/a Cingular).

I hereby certify to the Washington Utilities and Transportation Commission ("Commission") under penalty of perjury under the laws of the State of Washington as follows:

- AT&T Mobility has been designated by the Commission as an eligible telecommunications carrier ("ETC") in certain areas in the State of Washington by Order dated April 29, 2005 in Docket UT-043011⁵;
- 2. Federal universal service support received by AT&T Mobility will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended in accordance with WAC 480-123-060.
- 3. During calendar year 2008, AT&T Mobility provided the supported services required by 47 U.S.C. § 214(e) and has provided detailed information on the use of funds in accordance with WAC 480-123-070;
- 4. During calendar year 2008, AT&T Mobility met the applicable service quality standards by complying substantially with the CTIA Consumer Code for Wireless Service as required by WAC 480-123-070(5);
- 5. During calendar year 2008, A&T Mobility had the ability to function in an emergency and met the applicable requirements as modified by the Commission Order 01, Docket UT-063060, Order 01, regarding the installation of backup power at its cell sites; and,
- 6. During calendar year 2008, AT&T Mobility publicized the availability of its Lifeline Service in a manner reasonably designed to reach those likely to qualify for service in accordance with newly enacted WAC 480-123-070(7).

⁵ See In the Matter of Amending the Designation of AT&T Wireless PCS of Cleveland, LLC: AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; Yakima Cellular Telephone Company; Bermerton Cellular Telephone; Olympia Cellular Telephone Company; Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., Petition to Amend the Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, March 2, 2005; Order, April 29, 2005.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Michael C. Maxwell

Vice President/General Manager

Pacific Northwest Market

July 30, 2009

Subscribed and sworn to before me this 30 day of July, 2009

Notary Public

OFFICIAL SEAL
SARAH A. HAUGEN
NOTARY PUBLIC - OREGON
COMMISSION NO. 41 1027
MY COMMISSION EXPIRES OCT. 18, 2010

Exhibit B

AT&T Mobility Use of ETC Support in 2008

REDACTED

AT&T Mobility details below the capital expenditures it made in 2008 with the federal universal service support that it received. These expenditures were focused on installing four-hours of backup power at AT&T Mobility's Priority and Coverage cell sites in compliance with Order 01 (Docket UT-063060) and constructing additional cell sites within its ETC designated area.

In addition to the expenditures listed below, AT&T Mobility also expended its own capital to increase the coverage, capacity, and reliability of AT&T Mobility's network in ETC designated areas and also completed technological upgrades to a number of its cell sites.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
Total		REDACTED

Exhibit C 2008 Outage Report

REDACTED

Exhibit D Requests for Service

REDACTED

Exhibit E Complaints per 1,000 Handsets/Lines

As required by WAC 480-123-070(4), AT&T Mobility (ATTM) provides the following information on the complaints it received during calendar year 2008. **REDACTED**

The report below includes the complaints received. For each complaint that AT&T Mobility receives from the FCC or the office of the attorney general, a specialized customer care group within AT&T Mobility attempts to contact the customer to resolve the matter. The customer care representative attempts to resolve the complaint to the customer's satisfaction or explains to the customer in more detail the reason for AT&T Mobility's position.

Report REDACTED

Exhibit F

AT&T Mobility Lifeline Brochure (front – English)

ifeline

Liberine offers you a discount on your monthly wheless bill, if you qualify.

Save money with Lifeline

Program Restrictions

Lifethe service is just \$24.89 a morth, which is then discoursed experiting on the federal and same support that's setable in your area. High now, you can save as much a \$45.50 end morth with federal Lifethe discourting, and even more if you quality for additional Lifethe discours from your size.

You are edigible for Likeline support on one phone line based as you trymopal readerers and histor to your name. You can get Lift Up benefits only once as the same address. Those benefits can only be applied toward your Authenton Rea, new or your purchase or your Authenton Rea, new or your purchase or your Authenton Rea, new or your purchase or you address you or apply your Lift Up benefits to say achterion charges you paid prior to signing up for the Lifetine and Lift Up programs.

Hyou live on Thibat Lands and quality, you could get Enhanced Lifeline support, which can reduce your wheless bill to as little as \$1.

Qualifying for Lifeline

Requirements way by state. If you like in a state that doctern offer state Lifethe support, you may qualify for rederat Lifethe benefits if your household income is at on below 135% of the Featrat Poverty Qualeithes (FPQ) or you participate in any of these programs:

Aust complete the Lifeline and Lint Up Application from and corby that you participate in a qualifying government program or ordrewise meet the edigibility standards. Mail the completed application for

Signing Up

- Medicald (not Medicare)
- Supplemental Security Income (SSI) Food Stormps

Scorudale, AZ 85267-2726 ATTN- Contract Services

PO Box 12726

- Federal Public Housing Assistance (FPHA) (Section 8)
 - Low-Income Home Energy Assistance (LINGAP)

Applications that are not completely filled out, legible and sligned will be returned. If you cannot access the application form from chigular contrôliting, just call 1-800-377-9450 and an application will be mailed to you.

Link up helps people who quality for Ufeline support pay for their Activation Fee and/or any related histaltrion charges. Link up cost of \$26 will be walted.

· Temporary Assistance for Needy Families (TAMF) Mathenal School Lunch Program (NSLP)

Customers seeking to qualify for program benefits under the income-based standards are required to provide written documentation of their household income.

if you like on Tribal Lands, you could also quasity for Enhanced Lifetine support if you meet the above requirements or participate in any of these programs: Burnou of Indian Alfairs (BIA) general assistrance

- Tiba Adhibitmed Temparay Assistance for Need Fomilies (Tribal TANE)
 - Tibol Administrated School Lunch Program (Tribol NSLP)
- Tribal Administened Head Start (me-thig Income queliging standards)

If you live in a state that offers state Lifeline support, the nate man are defined as offered in the state Lifeline and Link Up application form, which is evaluate at cinquisar.com/lifeline or by calling 1-800-317-9450. Plasse note: K's up to you to let us know if and when you stop qualifying for program benefits. At that time, benefits will cease.

Lifeline service for only 52499° per month 300 Anytime Minutes / 1000 Night and Weekend Minutes Additional discounts may apply depending on the federal and state substay applicable in Washington. AND LIBITING CALLING AND ANYTHM 2 AND MIGHT & WORKEN Fixure Coverage Area AT&T REGION

If you still have questions or would like to receive information by mail. please call a Lifetine Customer Service Representative at 1-800-377-9450, Monday through Rhiday between the hours of 800 a.m. - 500 p.m. PST.

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Lifeline y Link Up

Servicio Lifeline

Servicio con descuento para clientes que reúnan los requisitos







Exhibit F (continued)

AT&T Mobility Lifeline Brochure (back – Spanish)

Jathe oftece un descreeno en la factura mensual de telefonta móvil, para quienes cumplen con los requisitos

Ahorra dinero con Lifeline

El servicio Lifetine cuesta solo \$24.99 por mes y se harà Lun decuentos cagnilia lassibucida relocidar y escrita que se ofrece en un efra, En este monemo, puedes ahornar massa \$25.20 por mes con el descuerno federal del ulfel he è frotuso més, al richnes los requestos pera descuertos adciponales de Lifetine en un sorado.

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Requisitos para Lifeline

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« Optones para difinentas (Food Stampas)

- Ingress condementatios de seguidad Supplementa Security Income o SSI, por su alga en Inglés) Adstructo federa por ou Wenda público (Federa Padiz Housing Assistance o FFHA, por su sigia en Inglés, Articulo 8
- Programo de astrendo a hogares de bajos ingresos para gastos de energo (Lov-Income Home Energy Astriance o Lilleak, por su sigla en ingles)
- Programs national de dimuezos escalates Matenal School Lunch Rogram o MS.P. par su siga en ingles)
 - Assistanto temparal a familias necestados Femparay Assistance for Needy Families o TANF, por su sigla en Ingles
 - Se requere que los cientes que bascan cumplir con los requisicos pas obrante los beneficios del programa tago las nomes bascas en los ingresos prograciónen documentación escrita sobre los fingresos de su grupo familiar.
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- Astrencia general de la Oticho para asumos Indipenas Bureau al Indian Affais o BA, par su sigia en Inglés)
- Astrando temporal o familios necesitados coministrado a trive tabol (Tabol Administrado Temporary Assistantos (or Needy Families o Tabol TAME, por su sigla en ingles)

Servicio Lifeline a sólo \$2499 por mes

Lifeline and Link Up

Washington

300 minutos a cualquier hora / 1000 minutos de noche y de fin de semanaí

"Es positive que se apliquen orros discuerros, según el subsidio ficiarial y estata, con espondieme a Wadhington

ATST REGION

- Ares de lamades para Lifetine de ATET

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 de fin de semana
- Arus de coberura finura

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Programa Heat Start adhibitarado a nivel utbal (on cumplimiento de los requisitas sobre ingresos)

No se ofrace servicio en esta área

importance si dejas de cumplir con los requisitos del programa, nos deberas ariaar en ese momemo. A parair de emonces, se suspenderan los beneficios. Restricciones del programa

Ago se puede retait la adservació de Urileire en una soda linea de trelefont, con labos en su trelefontal principal, futurada a sun combre bodran a trelefontal principal. Les laboratores en su en la retain defección. Bes laboratores en la retain de describe de activación numa en la compara des que ne cargo de activación, numa en la compara des que ne mançon con de activación actedires al momento en que se fescribiste en los programes Lifenes y leix los

Para inscribirse

Completa el fomulario de solicitud de Lifetine y Link Ny Certifica que participas en uno de los programas gubernamentales seleccionados o que cumples con los requisitos necesarios. Envia la solicitud completa a:

ATTN: Comment Services

Scortsdale, AZ 85287-2726 PO Box 12726

Si no puedes tener acceso al formulario de solicitud en cingular.com/lifetina, itama al 1-800-377-9450 y te enviaremos uno por correo. Se devolveran las solicitudes que no se reciban completas, sean ilegibles o no estén firmadas.

E programa Link Up ayuda a las personas que cumplan con los requisitos para necibir los beneficios de Lifeline a pagar el cargo de actración o los argigos relacionados con la insalación. No se cobrará el costo de 536 con esponaliente a Link Up.







Service Ifeline

for qualifying customers Discounted service



En caso de tener preguntas o si deseas recibir información por correo, comunicate con un representante del servido al cilome de Libeline al 1-800-377-9450, de lanes a viennes de 850 am, a 550 pm, thora del Pacifico,

The new at&t LCP BH T 050T 0003 E

Exhibit G

AT&T Mobility Lifeline Advertisement



FREE SHIPPING | 1.800.377.9450 - WWW.WIRELESS.ATT.COM/ABOUT/COMMUNITY-SUPPORT/INDEX.JSP

Transition to Digital Broadcasting on February 17, 2009

After the transition to digital broadcasting, analog-only TVs will need a conventer to get full-power, over-the-air broadcasts. Analog-only TVs shouldn't need a conventer for low-power, Class A, or translator TV stations; cable and statellite TV services, or VCRs, DVDs, and video games. Contact www.DTV.gbv, www.tbv.2009.gbv, or 1-888-DTV-2009 for more information on the DTV transition and subsidized coupons for conventers.

Exhibit H
Lifeline Print Publications and Dates - 2008

Publication	Publication Date	
Tri-City Herald	3/5, 6/18, 9/17	
Whidbey News-Times	3/5, 6/18, 9/17	
Port Townsend Leader	3/5, 6/18, 9/17	
Bremerton (Kitsap) Sun	3/5, 6/18, 9/17	
Yakima Herald	3/5, 6/18, 9/17	

Exhibit ILifeline Packets Distributed to the Following Agencies

Program / Public Agency	Address
Catholic Community Services	100 - 23rd Ave S Seattle, WA 98144
Catholic Community Services	875 - 140th Ave NE Suite 205 Bellevue, WA 98005
Asian Counseling & Referral Services	3639 Martin Luther King Jr. Wy S Seattle, WA 98144
Angelorum Pregnancy Services	19662 Aurora Ave N, Suite A Shoreline, WA 98133
Solid Ground	1501 N 45th Street Seattle, WA 98103
Issaquah Valley Community Services	PO Box 652 Issaquah, WA 98027
Jewish Family Services	1601 - 16th Ave Seattle, WA 98122
Kent Food Bank	515 W Harrison Street, Suite 107 Kent, WA 98032
Lutherna Alliance to Create Housing	8757 - 15th Ave NW Seattle, WA 98117
Multi-Service Center	1200 S 336th Street Federal Way, WA 98003
Muckleshoot Family Resource Center	39015 - 172nd Ave SE Auburn, WA 98092

Exhibit J

AT&T Mobility Lifeline Direct Mail Postcard (front side)

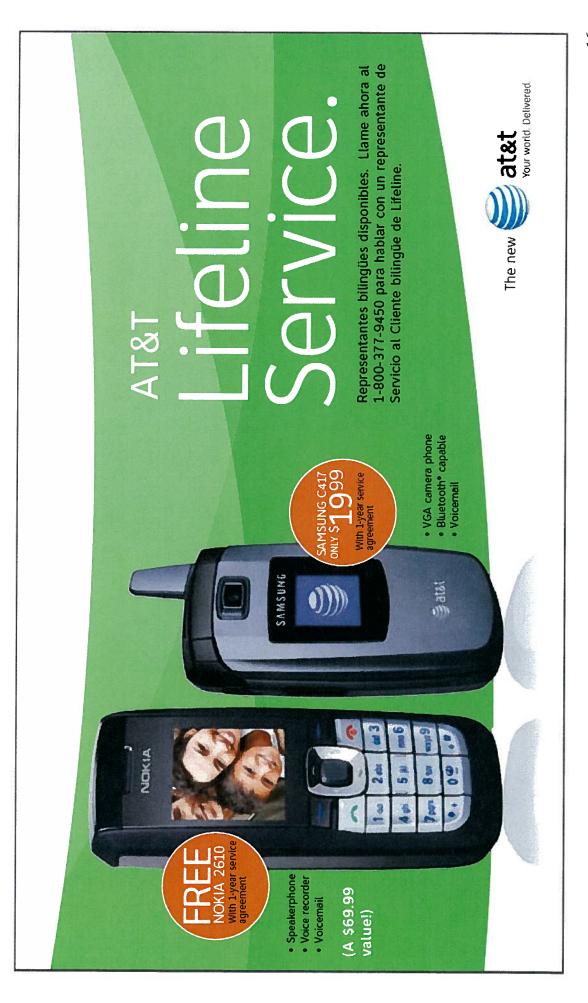


Exhibit J (continued) AT&T Mobility Lifeline Direct Mail Postcard (back side)



The affordable way to stay in touch, plus a free phone.

Qualified low-income residents may receive discounted wireless service from AT&T under the Lifeline program. Customers must meet certain eligibility criteria based on income level or current participation in financial assistance programs. For questions or to apply for Lifeline Service, call a Lifeline Customer Service Representative at 1-800-377-9450 or visit www.wireless.att.com/about/community-support/index.jsp.

Check out the two great phones shown here to go with your Lifeline Service.

LIFELINE LINK-UP:

\$24.99 per month prior to discounts – includes 300 anytime minutes and 1,000 night and weekend minutes.

PRSRT STD U.S. POSTAGE PAID AT&T

> PO Box 191508 Atlanta, GA 31119-1508

Ms. Jane Sample 123 Main Street, Suite # Anytown, USA 00000-0000 ||||...|||...|||...|||...|||...|||...|||...| Call 1-800-377-9450, log on to www.wireless.att.com/about/community-support/index.jsp or come in to an AT&T store near you.

Offers available while supplies last. Regarding equipment offered substitutions may apply. For specific information regarding the ferms and conditions of the rate plan, please refer to the Lifeline and conditions of the rate plan brochure and the Lifeline and Link-Up service applications available at ATAT Stores and at www.wireless.att.com/about/community-support/index/sp. "Roaming" and other charges may apply. Clients and applicants of the Lifeline service must meet certain criteria based on their income and/or their current participation in certain programs of economic assistance. Certain restrictions apply, © 2007 AT&T Knowledge Ventures, All rights reserved, AT&T and AT&T logos are trademarks of AT&T Knowledge Ventures and/or AT&T affiliated companies.

Exhibit K Federally Recognized Indian Tribes Outreach List

15838 Sandy Hook Road Suquamish Tribe Poulsbo, Washington 98370 Kitsap	Tribe	Address	County
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Exhibit L

Annual Plan for Universal Service Support Expenditures for October 1, 2009 through December 31, 2010⁵

As explained in section I.B.1 above, AT&T Mobility will not receive any federal universal service support in 2009. Assuming that there are no additional changes to the federal universal service support mechanisms, AT&T Mobility anticipates that it will start receiving federal universal service support in January 2010 and projects that it will receive **REDACTED** through December 31, 2010.

As the Commission is aware, the amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC and the number of AT&T subscribers that have service in a particular wire center. In addition, there are a number of matters currently pending before the FCC that, if adopted, could greatly impact the amount of funding available for CETCs. If the federal high cost support that AT&T Mobility receives is less than it currently anticipates, AT&T Mobility may reduce or eliminate some projects included in its plan for 2010.

In general the capital expenditures listed below increase the coverage, capacity, and reliability of AT&T Mobility's network in ETC designated areas in Washington. AT&T Mobility's focus for capital investment in 2010 was to fill in coverage gaps, increase the depth and capacity of the network, and increases reliability, thereby increasing the quality of service experienced by the customer. AT&T Mobility also utilized some of the ETC support on technological upgrades which also provide increased benefits to the consumer.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED

⁵ AT&T Mobility understands that the Washington rule only requires it to provide planned expenditure information through September 30, 2010; however, AT&T Mobility's plans are on a calendar year basis.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
Total		REDACTED