AT&T Mobility (SAC 529910) Annual Eligible Telecommunications Carrier Report for 2010 and 2012 Annual Plan

AT&T Mobility, study area code ("SAC") 529910, submits its Annual Eligible Telecommunications Carrier Report for 2010 ("2010 Report") and Annual Plan for 2012¹ in accordance with the rules that apply to Eligible Telecommunications Carriers ("ETCs").

This filing includes the 42 additional wire centers in Washington RSAs 2 and 3 that AT&T Mobility purchased from Rural Cellular Corporation of Minnesota and that were added to AT&T Mobility's ETC designation effective October 15, 2009.² Only when it is necessary will a distinction be made in this filing between the original ETC designated area ("Legacy ETC Designated Area")³ and those areas there were added in 2009 ("ETC Designation RSA 2/3").

I. AT&T MOBILITY ETC REPORT FOR 2010

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 2010

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

Information on the use of federal high cost universal service support received by AT&T Mobility in its Legacy ETC Designated Area is attached hereto as **Confidential Exhibit B-1.** Consistent

¹ As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner for its 2010 Report and 2012 Annual Plan.

² See New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company; and Olympia Cellular Telephone Company Inc. d/b/a AT&T Mobility For Amendment of its Designation as an Eligible Telecommunications Carrier to Include Additional Wire Centers, Order Granting Amendment of Designation as an Eligible Telecommunications Carrier to Include Wire Centers in Washington Rural Service Area 2 and 3, Docket UT-04-3011, Order 03, ("ETC Designation RSA 2/3").

³ 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.

with its prior commitment, AT&T Mobility is separately providing as <u>Confidential Exhibit B-2</u> its use of ETC support for the ETC Designation RSA 2/3 for calendar year 2010.

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

AT&T Mobility's local service outage report for calendar year 2010 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 duration 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 overly inclusive such that it contains 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 were still receiving service from other sectors of the cell site. Further, due to system limitations the information provided in the 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 that were unfulfilled for calendar year 2010 is included as **Confidential Exhibit D**. The exhibit also describers in detail how AT&T Mobility attempted to provide service to those customers. AT&T Mobility has employed the standard adopted by the Federal Communication Commission ("FCC") in 47 C.F.R. §54.202(a)(1)(B) for evaluating requests for service.

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

AT&T Mobility's report with separate totals for the numbers of complaints from customers in Washington made to the FCC and 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 requires 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 2010, 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 February 15, 2007, the Commission issued Order 01 (Docket UT-063060) which required that by February 15, 2009 AT&T Mobility have 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 ("Back-up Power Report")⁴ which showed that all but three of its priority and coverage cell sites had been augmented to comply with the 4-hour backup power requirement. In that same filing, AT&T Mobility requested a one year extension for the three priority and coverage cell sites that due to various reasons were not able to be upgraded by February 15, 2009. In Order 02, Ordering Paragraph 4, the Commission granted AT&T Mobility a one-year extension for these three cell sites⁵ and the upgrades were completed.

On August 3, 2009, AT&T Mobility filed with the Commission a Request for Clarification or in the Alternate an Extension for Compliance with the 4-hour back-up power requirement for its non-priority sites. The Commission in Order 02 (Docket UT-063060) decided that all of AT&T Mobility's cell sites within its ETC designated area must meet the 4-hour back-up power requirement; however, the Commission granted AT&T Mobility until July 1, 2012 to meet this requirement for its non-priority sites, subject to certain conditions. One condition was that AT&T Mobility must include a compliance status report on back-up power upgrades in its annual ETC filing with the Commission. Confidential Exhibit F contains AT&T Mobility's status report on the back-up power upgrades to its non-priority sites.

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

The certification for this section is included in **Exhibit A**.

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.

⁵ The Commission subsequently issued Order 03 in this docket to clarify paragraph 15 of Order 02.

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 2010 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.

- Maintained a dedicated, bi-lingual Lifeline Customer Care team supporting Lifeline Service 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 **Exhibit G** is an example of AT&T Mobility's Lifeline brochure.
- Maintained a dedicated Lifeline Web site which provides information about the offer and includes applications available for downloading;
- Continued advertising in newspapers across the state to publicize the availability of the Lifeline offering, a copy of AT&T Mobility's Lifeline advertisement in 2010 is attached as <u>Exhibit H.</u> A schedule for when the Lifeline ad was placed and in which newspaper is attached as <u>Exhibit I</u>; and,
- 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.

II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080 for October 1, 2011 through September 30, 2012

<u>Confidential Exhibit K</u> contains AT&T Mobility's projected receipt of federal high cost support in 2012 under the current federal rules, including the interim cap of high cost support for competitive ETCs ("CETCs"), and AT&T Mobility's plans for use of the federal high cost support for January 1, 2012 through December 30, 2012.⁶

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, the number of AT&T Mobility subscribers in a particular wire center, and the amount of support received by other CETCs. 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 AT&T Mobility. 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 2012.

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 2012 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 2012, 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.

⁶ As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner its expected receipt and use of ETC funds for calendar year 2012.

Another impact on AT&T Mobility's federal high cost support receipts for 2011 is that USAC implemented the 2008 *Dobson ETC Cap*. When the FCC approved the AT&T/Dobson merger, 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.

Exhibit A

Certification

Exhibit A

AT&T MOBILITY LLC ANNUAL CERTIFICATION July 2011

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 (collectively, "AT&T Mobility").

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:

- 1. 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-043011¹ which was expanded by Order 03 dated October 15, 2009 in the same docket²;
- 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 2010, 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 2010, 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 2010, A&T Mobility had the ability to function in an emergency and met the applicable requirements as modified by the Commission in Docket UT-063060, Orders 01 03 regarding the installation of backup power at its cell sites; and,

¹ 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; Bremerton 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.

² See New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company; and Olympia Cellular Telephone Company Inc. d/b/a AT&T Mobility For Amendment of its Designation as an Eligible Telecommunications Carrier to Include Additional Wire Centers, Order Granting Amendment of Designation as an Eligible Telecommunications Carrier to Include Wire Centers in Washington Rural Service Area 2 and 3, Docket UT-04-3011, Order 03.

6. During calendar year 2010, 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 WAC 480-123-070(7).

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 20, 2011

Subscribed and sworn to before me this 20th day of July, 2011

Welen Lais Ball
Notary Public

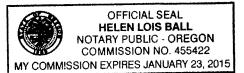


Exhibit B-1

AT&T Mobility Use of ETC Support in 2010

This report is for the Legacy ETC Designated Area. AT&T Mobility received **REDACTED** in federal high cost support in its Legacy ETC Designated Area and spent that support as outlined below. In addition to the items included in the table below, AT&T Mobility spent millions more in Washington to improve the coverage, capacity and reliability of its network, including upgrades to its mobile switching center.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
Total		REDACTED

Exhibit B-2 AT&T Mobility Use of ETC Support in 2010

AT&T Mobility received **REDACTED** in federal high cost support in 2010 in its Washington 2/3 ETC Designated Area. In addition to the items listed below, AT&T Mobility spent more to improve the coverage, capacity and reliability of its network, including upgrades to its mobile switching center.

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

Exhibit C 2010 Outage Report

Exhibit D Requests for Service

For all requests for service that AT&T Mobility received through its Service Extension Process, outlined below, AT&T Mobility only had **REDACTED** request that went unfulfilled.

Address of request: REDACTED

<u>Description of attempt to provide service:</u> **REDACTED** AT&T Mobility first determined that the customer was in an ETC designated area and then followed the following steps to determine whether it could reasonably provide service to the customer.

1. Modifying or replacing customer equipment: **REDACTED**

2. Adjusting other network or customer equipment: **REDACTED**

3. Adjusting nearest cell site: **REDACTED**

4. Reselling another carrier's service: **REDACTED**

5. Constructing a repeater or extender: **REDACTED**

6. Construct a cell site: **REDACTED**

Exhibit E Complaints per 1,000 Handsets/Lines

As required by WAC 480-123-070(4), AT&T Mobility provides the following information on the complaints it received during calendar year 2010. Specifically, **REDACTED** complaints were filed by AT&T Mobility customers in Washington with the FCC or approximately **REDACTED** complaints per 1,000 customers. AT&T Mobility customers in Washington filed **REDACTED** complaints with the office of the attorney general of Washington or **REDACTED** per 1,000 customers.

The following report 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.

Exhibit F

AT&T Back-Up Power Compliance Report: Non-Priority Sites

Exhibit G AT&T Mobility Lifeline Brochure

Lifeline and Link Up: Washington





Discounted service for qualified customers

Lifeline

Lifeline offers you a discount on your monthly wireless bill, if you qualify.

Save Money With Lifeline

Lifeline service is just \$24.99 a month, which is then discounted depending on the federal and state support that's available in your area. Right now, you can save as much as \$8.25 each month with federal Lifeline discounting, and even more if you qualify for additional Lifeline discounts from your state.

If you live on Tribal Lands and qualify, you could get Enhanced Lifeline support, which can reduce your wireless bill to as little as \$1.

Qualifying for Lifeline

Requirements vary by state. If you live in a state that doesn't offer state Lifeline support, you may qualify for federal Lifeline benefits if your household income is at or below 135% of the *Federal Poverty Guidelines* (*FPG*), or you participate in any of these programs:

- Medicaid (not Medicare)
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) (Section 8)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)

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

If you live on Tribal Lands, you could also qualify for Enhanced Lifeline support if you meet the above requirements or participate in any of these programs:

- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Administered Temporary Assistance for Needy Families (Tribal TANF)
- Tribal Administered National School Lunch Program (Tribal NSLP)
- Tribal Administered Head Start (meeting income qualifying standards)

If you live in a state that offers state Lifeline support, you must meet the criteria as defined in the state Lifeline and Link Up application form, which is available at http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp or by calling 1-800-377-9450.

Please note: You are responsible for notifying AT&T when you no longer meet the applicable eligibility requirements for the Program within (5) days of becoming aware of such ineligibility.

Program Restrictions

You are eligible for Lifeline support on one phone line based at your principal residence and billed to your name. You can get Link Up benefits only once at the same address. Those benefits can only be applied toward your Activation Fee, never toward your purchase of equipment. Finally, you can't apply your Link Up benefits to any activation charges you paid prior to signing up for the Lifeline and Link Up programs.

Signing Up

Just complete the Lifeline and Link Up Application form and certify that you participate in a qualifying government program or otherwise meet the eligibility standards. Mail the completed application to:

AT&T

ATTN: Contract Services

1215 W. Cherry St.

Vermillion, SD 57069

If you cannot access the application form from http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp, just call **1-800-377-9450** and an application will be mailed to you.

Applications that are not completely filled out, legible and signed will be returned.

link up

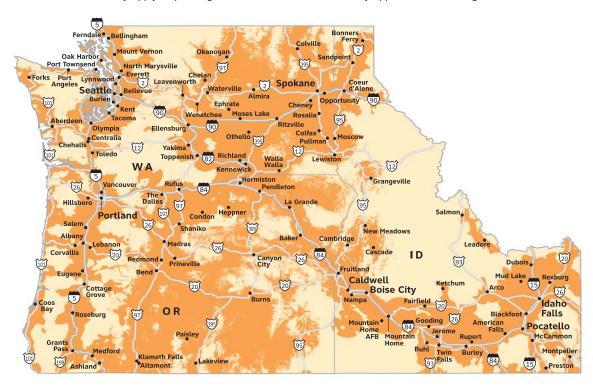
Link Up helps people who qualify for Lifeline support pay for their Activation Fee and/or any related installation charges.
Link Up cost of \$36 will be waived.

The first nations carrier to be aware street as a series of the series o

Lifeline service for only \$2499* per month

300 Anytime Minutes / 1000 Night & Weekend Minutes[†] and Nationwide Long Distance Included

*Additional discounts may apply, depending on the federal and state subsidy applicable in Washington.



AT&T Coverage Area

If you still have questions or would like to receive information by mail,

please call a Lifeline Customer Service Representative at **1-800-377-9450**, Monday through Friday between the hours of 10:00 a.m. - 7:00 p.m. CST.

AT&T GSM handset required on Lifeline/Link Up plans.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included or excluded in your plan. Map depicts an approximation of outdoor coverage, Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from the graphics shown in the map, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber. Future coverage, if depicted above, is based on current planning assumption but is subject to change and has not yet been confirmed.

The night and weekend periods are from 9:00 p.m. to 6:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The airtime minutes used in long distance calls to the United States will be discounted from the plan. Originating international long distance calls will not be allowed. The roaming cost is \$0.25 per minute and airtime minutes used will be discounted from minutes included in the plan. International roaming is not available. No rollover can be made. The airtime minutes used in excess of the ones included in the plan will be charged at \$0.15 per minute. These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations. To determine if Lifeline and Link Up are available from AT&T Mobility at your principal residence, please contact a Lifeline Customer Service Representative at 1-800-377-9450.

Terms and Conditions: Lifeline and Link Up Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline and Link Up Contract.
© 2010 AT8T Intellectual Property. All rights reserved. AT8T, the AT8T logo and all other marks contained herein are trademarks of AT8T Intellectual Property and/or AT8T affiliated companies.

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Lifeline y Link Up: Washington

servicio lifeline



Servicio con descuento para clientes que reúnan los requisitos

Lifeline.

Lifeline ofrece un descuento en la factura mensual de telefonía móvil, para quienes cumplen con los requisitos.

Ahorra dinero con Lifeline

El servicio Lifeline cuesta sólo \$24.99 por mes, menos los descuentos que se apliquen según la asistencia federal y estatal que se ofrece en tu área. En este momento, puedes ahorrar hasta \$8.25 por mes con el descuento federal de Lifeline, e incluso más, si reúnes los requisitos para descuentos adicionales de Lifeline en tu estado.

Si vives en territorios tribales y cumples con los requisitos, podrías recibir la asistencia de Enhanced Lifeline para reducir el total de la factura de telefonía móvil y pagar hasta un mínimo de \$1.

Requisitos para Lifeline

Los requisitos varían según el estado. Si vives en un estado que no ofrece asistencia de Lifeline, es posible que reúnas los requisitos para recibir los beneficios federales de Lifeline si los ingresos de tu grupo familiar no superan el 135% de las Normas Federales de Pobreza (Federal Poverty Guidelines o FPG, por su sigla en inglés) o si participas en uno de estos programas:

- Asistencia médica Medicaid (no Medicare)
- Cupones para alimentos (Food Stamps)
- Ingresos complementarios de seguridad (Supplemental Security Income o SSI, por su sigla en inglés)
- Asistencia pública federal para vivienda pública (Federal Public Housing Assistance o FPHA, por su sigla en inglés), Artículo 8
- Programa de asistencia a hogares de bajos ingresos para gastos de energía (Low Income Home Energy Assistance o LIHEAP, por su sigla en inglés)
- Programa nacional de almuerzos escolares (National School Lunch Program o NSLP, por su sigla en inglés)
- Asistencia temporal a familias necesitadas (Temporary Assistance for Needy Families o TANF, por su sigla en inglés)

Se requiere que los clientes que buscan cumplir con los requisitos para obtener los beneficios del programa bajo las normas basadas en los ingresos proporcionen documentación escrita sobre los ingresos de su grupo familiar.

Si vives en territorios tribales, también podrías recibir los beneficios de Enhanced Lifeline si cumples con los requisitos anteriores o participas en uno de estos programas:

- Asistencia general de la Oficina para asuntos indígenas (Bureau of Indian Affairs o BIA, por su sigla en inalés)
- Asistencia temporal a familias necesitadas administrada a nivel tribal (Tribal Administered Temporary Assistance for Needy Families o Tribal TANF, por su sigla en inglés)
- Programa de almuerzos escolares administrado a nivel tribal (School Lunch Program o Tribal NSLP, por su siala en inalés)
- Programa Head Start administrado a nivel tribal (con cumplimiento de los requisitos sobre ingresos)

Si vives en un estado que ofrece la asistencia de Lifeline, debes reunir los requisitos que se definen en el formulario de solicitud de Lifeline y Link Up de dicho estado, que se puede consultar en http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp o al llamar al 1-800-377-9450.

Importante: el cliente es responsable de notificar a AT&T cuando ya no cumpla con los requisitos correspondientes para recibir los beneficios del Programa dentro de los cinco (5) días posteriores a tener conocimiento de tal inhabilitación

Restricciones del programa

Sólo se puede recibir la asistencia de Lifeline en una sola línea de teléfono, con base en tu residencia principal, facturada a tu nombre. Podrás recibir los beneficios de Link Up solamente una vez en la misma dirección. Esos beneficios se podrán aplicar solamente en el cargo de activación, nunca en la compra del equipo. Tampoco se pueden usar los beneficios de Link Up para pagar cargos de activación anteriores al momento en que te inscribiste en los programas Lifeline y Link Up.

Para inscribirte

Completa el formulario de solicitud de Lifeline y Link Up, y certifica que participas en uno de los programas gubernamentales seleccionados o que cumples con los requisitos necesarios. Envía la solicitud completa a:

AT&T ATTN: Contract Services 1215 W. Cherry St. Vermillion, SD 57069

Si no puedes tener acceso al formulario de solicitud en http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp, llama al **1-800-377-9450** y te enviaremos uno por correo.

Se devolverán las solicitudes que no se reciban completas, sean ilegibles o no estén firmadas.

link up

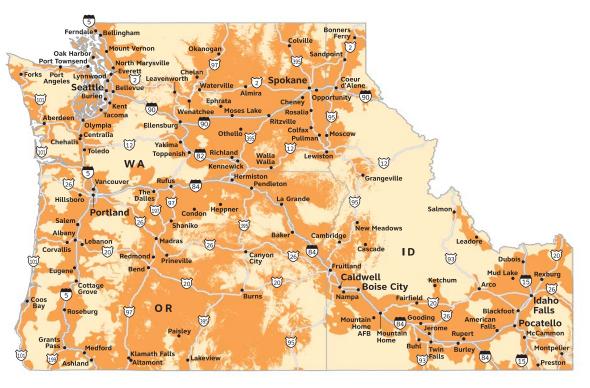
El programa Link Up ayuda a las personas que cumplan con los requisitos para recibir los beneficios de Lifeline a pagar el cargo de activación o los cargos relacionados con la instalación. No se cobrará el costo de \$36 correspondiente a Link Up.

La primera emprese telefórica naciona en recibir el premi sur INFALEZ ConsumerInformation Code POLALITA Para más información varia vevencial.cog

Servicio Lifeline a sólo \$2499* por mes

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana[†], y larga distancia a nivel nacional

*Es posible que se apliquen otros descuentos, según el subsidio federal y estatal correspondiente a Washington.



Área de cobertura de AT&T

En caso de tener preguntas o si deseas recibir información por correo,

comunicate con un representante del servicio al cliente de Lifeline al **1-800-377-9450**, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

Para los planes Lifeline y Link Up se requiere un teléfono GSM de AT&T.

La información que aparece en la pantalla del teléfono no indica la tarifa que se cobrará. Es importante revisar el mapa de cobertura para ver las áreas que se incluyen en el plan. El mapa muestra una aproximación de la cobertura al aire libre. El mapa puede incluir áreas en las que otras compañías no aflitadas ofrecen sus servicios y es posible que represente el área para la cual se cuenta con licencia en lugar de una aproximación de cobertura. El área de cobertura real puede variar considerablemente de lo que muestran los gráficos del mapa por motivos del terreno, clima, follaje, edificios y demás construcciones, intensidad de la señal, equipo del cliente y otros factores. AT&T no garantiza la cobertura. Los cargos dependerán del lugar de donde se transmite y recibe la llamada, mas no del lugar en donde se encuentra el suscriptor. La cobertura futura, en caso de representarse arriba, se basa en suposiciones actuales de planificación, aunque se encuentra sujeta a cambio y aún no se ha confirmado.

**! Los períodos de noche y de fin de semana se extienden de 9:00 p.m. a 6:00 a.m. de lunes a viernes, y sábados y domingos durante las 24 horas. Los minutos de uso utilizados en las llamadas de larga distancia a los Estados Unidos se descontarán del plan. No está permitido efectuar llamadas de larga distancia internacional. El costo de roaming es de \$0.25 por minuto y los minutos de uso se descontarán de los minutos incluidos en el plan. No se ofese servicio de roaming internacional. No se pueden traspasar los minutos de mes a mes. Los minutos de uso que excedan la cantidad asignada en el plan se cobrarán a \$0.15 por minuto. Estos programas gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos requisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece los servicios de Lifeline y Link Up en el lugar de residencia principal del suscriptor, favor de comunicarse con un representante del servicio al cliente de Lifeline al 1-800-377-9450.

Términos y condiciones: el servicio de Lifeline y Link Up está sujeto a los términos y condiciones que aparecen en los Términos de servicio, el Plan de tarifas, la Información de venta y en el Contrato de Lifeline y Link Up. © 2010 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todas las otras marcas contenidas aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T Actualizado: julio de 2010.

WAS

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7/23/10 11:05:13 AM

Exhibit H AT&T Mobility Lifeline Advertisement



lifeline

under the L<mark>ifeline</mark> Customers must meet certain eligibility criteria I on income level or current participation in financial assistance programs.



FREE SHIPPING | 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.

LIFFLINE

\$24.99 per month prior to discounts includes 300 Anytime minutes, 1,000 night & weekend minutes, and nationwide long distance.

LINKUP

No activation fee.

ADDITIONAL SERVICE PLANS AVAILABLE STARTING AT \$399 plus additional charges MINIMUM RATE PLAN INCLUDES:

- 450 minutes per month
- 5,000 night & weekend minutes
- No roaming or long distance charges
- Directory assistance available by dialing 4-1-1, \$1.79 per call
- Free mobile to mobile service
- No additional charge to call 9-1-1
- No additional charge to dial "O" for operator assistance to complete a call

Coverage is not available in all areas. See coverage map at stores for details. Phone Return Policy/Early Termination Fee: None if cancelled in Tirst 30 days; up to \$35 restocking fee may apply to equipment returns; thereafter \$150 or \$325 depending on device (check att. com/equipmentETF). Agents may impose add'l fees. Subject to change. **Sales Tax** calculated based on price of unactivated equipment. **Billing:**Usage rounded up to the next full minute or kilobyte, at the end of each call or data session, for billing purposes. © 2010 AT&T Intellectual Property. Service provided by AT&T. Mobility. All rights reserved. AT&T, the AT&T logo, and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. All other marks contained herein are the property of their respective owners.





Exhibit I
Lifeline Print Publications and Dates - 2010

Publication	Dates of Publication	Location
Bellingham Herald	2/2, 5/4, 8/3, 10/26	Skagit, Whatcom
The Columbian/Vancouver Columbian	2/2, 5/4, 8/3, 10/26	Skamania, Cowlitz, Clark
Kitsap Sun	2/2, 5/4, 8/3, 10/26	Jefferson, Kitsap, Mason
Longview Daily News	2/2, 5/4, 8/3, 10/26	Columbia, Cowlitz, Lewis, Pacific, Wahkiakum
Olympia Olympian	2/2, 5/4, 8/3, 10/26	Grays Harbor, Lewis, Mason, Thurston
Port Townsend Leader	2/3, 2/5, 8/4, 10/27	Jefferson
Seattle Times/Post Intelligencer		Benton, Chelan, Clallam, Cowlitz, Douglas, Grant, Grays Harbor, Island, Jefferson, King, Kitsap, Kittitas, Lewis, Mason, Okanogan, Pierce, San Juan, Skagit, Snohomish, Thruston, Whatcom,
	2/2, 5/4, 8/3, 10/26	Yakima
Spokane Spokesman-Review	2/2, 5/4, 8/3, 10/26	Adams, Benewah, Bonner, Boundary, Grant, Kootenai, Latah, Lincoln, Pend Oreille, Shoshone, Spokane, Stevens, Whitman
Tacoma News Tribune	2/2, 5/4, 8/3, 10/26	Grays Harbor, King, Kitsap, Lewis, Mason, Pierce, Thurston
Tri-City Herald	2/2, 5/4, 8/3, 10/26	Adams, Grant, Franklin, Benton, Umatilla, Walla Walla, Yakima
Whidbey News-Times	2/6, 5/8, 8/7, 10/30	Island
Yakima Herald-Republic	2/2, 5/4, 8/3, 10/26	Benton, Kittitas, Klickitat, Yakima

Exhibit J AT&T Mobility Lifeline Direct Mail Postcard





Lifeline Service.

Representantes bilingües disponibles. Llama ahora al **1-800-377-9450** para hablar con un representante bilingüe del servicio al Cliente de Lifeline.





brochure and the Lifeline and Link-Up service applications at

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.

Other phones are available at a discount with your Lifeline Service.

LIFELINE LINK-UP:

\$24.99 per month prior to discounts — includes 300 Anytime Minutes, 1,000 Night and Weekend Minutes.

Call 1-800-377-9450 or log on to www.wireless.att.com/about/community-support/index.jsp







Exhibit K

Annual Plan for Universal Service Support Expenditures for October 1, 2011 through December 31, 2012⁸

AT&T Mobility projects that it will receive **REDACTED** for its entire ETC designated area in Washington for January 1 – December 31, 2012.

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 2012.

In general the capital expenditures listed below increase the coverage, capacity, and reliability of AT&T Mobility's network in its ETC designated area in Washington.

Item	Description	Planned Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED

⁸ AT&T Mobility understands that the Washington rule only requires it to provide planned expenditure information through September 30, 2011; however, AT&T Mobility's plans are on a calendar year basis.

Item	Description	Planned Amount
REDACTED	REDACTED	REDACTED
Total		REDACTED

Exhibit L

Map

Cell sites as of end of year 2010 and end of year 2012