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By Electronic Mail and Overnight Mail

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

RE: 2015 ETC Certification - AT&T Mobility Amended Exhibit B

Dear Mr. King:

As requested by Staff, AT&T Mobility is submitting the attached amended Exhibit B in compliance with WAC 480-123-070 (1) (b) and 480-123-080 (2).

Please note that Exhibit B contains certain confidential and proprietary information for which AT&T Mobility seeks confidential treatment pursuant to WAC 480-07-160 and RCW 80.04.095. Consistent with the Commission's rules, AT&T Mobility has specifically designated the information that is confidential and provided both the complete responses and redacted version. The unredacted confidential documents have been printed on yellow paper, marked "Confidential per WAC 480-07-160)" and enclosed in a separate envelope marked "Confidential per WAC 480-07-160".

AT&T Mobility states as follows the legal basis under which the information is claimed to be confidential. Pursuant to WAC 480-07-160(2)(c) confidential treatment may be afforded to "valuable commercial information, including trade secrets... cost, or financial information, or customer-specific usage and network configuration and design information, as provided in RCW 80.04.095." The information that AT&T Mobility claims are confidential include portions of Exhibits B which reflects in granular detail the status of the network improvements AT&T Mobility has undertaken for calendar year 2014 and a description of the amounts of its expenditures and eligible improvements to the network that it plans to make in 2016.

If there are any questions, please do not hesitate to contact me.

Sincerely,

Sharon Mullin
Sharon Mullin

Enclosures

cc: Tim Zawislak – WUTC Staff

REDACTED Exhibit B - Report on Use of 2014 Federal High Cost Support

| ILEC Study Area (list every study area) | Wire Center CLLI (list every wire center) | Wire Center Name | Project (e.g. cell site, radio, cabinets, etc.) or if no project for the W/C provide reason why | Start Date | Completion Date | Capital Investment | 2014 Expense (utilities, Lease, Interconnect) | Capital and Expense investment for 2014 |
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| | | | | | | \$ REDACTED | \$ REDACTED | \$ REDACTED |

\$ REDACTED 2014 Total Disbursement from Federal High Cost Support

Note: 1st Carrier is a capacity augment increasing the transport and therefore the voice/data capacity available at the site.

Customer benefit (2014):

- NSB (New Site Build) – **REDACTED**
- 1st Carrier – These sites were upgraded from second generation (“2G”) technology to UMTS which along with increasing capacity provides customers with more uniform voice quality along with the ability to employ advanced voice features and simultaneous voice and data service usage. In addition, customers enjoy higher data speeds.
- LTE Upgrade – These cell sites were upgraded to LTE (4G) which improves capacity. Customers will enjoy much faster data speeds than 3G technology.
- Operating Expense – Supports expenses associated with sites built with ETC support allowing customers to have access to a robust network in Washington ETC areas.

Redacted Exhibit B - 2016 Washington Service Improvement Plan

| ILEC Study Area (list every study area) | Wire Center CLLI (list every wire center) | Wire Center Name | Project (e.g. cell site, radio, cabinets, etc.) or if no project for the W/C provide reason why | Start Date | Completion Date | Capital Investment | 2016 Expense (utilities, Lease, Interconnect) | Capital and Expense investment for 2014 |
|---|---|------------------|---|------------|-----------------|--------------------|---|---|
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\$ REDACTED Estimated 2016 Total Disbursement from Federal High Cost Support

Customer benefit (2016):

- Operating Expense: Supports expenses associated with sites built with ETC support allowing customers to have access to a robust network in Washington ETC areas.