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**Via E-Filing**

February 2, 2015

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

**Re: Docket UT-150061**  
**FCC Form 555, Annual Lifeline Eligible Telecommunications Carrier Certification**  
**Form for New Cingular Wireless PCS, LLC (“AT&T Mobility”)**

Dear Filing Center:

As required by the FCC in its February 6, 2012 Released Order in WC Docket No. 11-42, attached is a copy of AT&T Mobility’s Washington FCC Form 555 filed with the FCC.<sup>1</sup> These results must be provided to the Commission, the Universal Service Administrative Company (“USAC”), and to the states and tribal governments.

Please contact me with any questions or concerns you may have at (512) 330-1698.

Sincerely,

*Sharon Mullin*  
Sharon Mullin  
Director - Regulatory

Attachment

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<sup>1</sup> AT&T Mobility filed its FCC Form 555 online with USAC. Once a carrier enters its six-digit study area code (“SAC”) into USAC’s online FCC Form 555, the online tool automatically populates a name associated with that SAC. In some cases, this automatically generated name differs from (*e.g.*, is an abbreviated version of) the legal entity name for AT&T Mobility’s eligible telecommunications carrier affiliate.



**Anisa A. Latif**  
Associate Director  
Federal Regulatory

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January 30, 2015

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, D.C. 20554

**Re: AT&T Annual Lifeline Eligible Telecommunications Carrier Certification  
Form – FCC Form 555  
WC Docket No. 14-171**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 54.416, AT&T, on behalf of its affiliate AT&T Mobility<sup>1</sup>, hereby submits its 2015 Annual Lifeline Eligible Telecommunications Carrier Certification Form via the Commission's Electronic Comment Filing System. As required, AT&T also submitted its filing to the Universal Service Administrative Company.

Should you have any questions, feel free to contact me.

Sincerely,

**/s/ Anisa A. Latif**  
Anisa A. Latif

Attachment

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<sup>1</sup> SAC Nos. 619004, 259908, 409004, 479006, 269905, 279010, 319026, 289912, 389015, 539010, 639005, 399015, 449022, 529910, and 209012.

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

*Deadline: January 31<sup>st</sup> (Annually)*

<p>529910</p> <hr/> <p>Study Area Code (SAC)</p> <p><i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for <b>each</b> SAC through which it provides Lifeline service).</i></p>	
<p>WA</p> <hr/> <p>State</p>	<p>Cingular Wireless</p> <hr/> <p>ETC Name</p>
<p>AT&amp;T Mobility</p> <hr/> <p>DBA, Marketing or Other Branding Name <i>(If same as ETC name, list "N/A" Do <u>not</u> leave blank)</i></p>	<p>SBC Telecom, SBC Long Distance, BellSouth N</p> <hr/> <p>Holding Company Name <i>(If same as ETC name, list "N/A" Do not leave blank)</i></p>

**Does the reporting company have affiliated ETCs?**

Yes

No

*Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.*

Affiliated ETC's SAC	Affiliated ETC's Name
-- See attached worksheet --	

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial SAM

**Section 2: Annual Recertification**

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year <i>(February data month)</i>	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year  <i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i>	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
126	0	7	2	117

**Recertification Results:**

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible  <i>(This should be a subset of Block G.)</i>	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
1	1	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
118	65

**Note:** If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

**Certification:**

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial SAM

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: USAC. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial SAM

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial \_\_\_\_\_

**Section 3: De-enroll Percentage**

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

<b>M = (F+K)</b>	<b>N = (J+L)</b>	<b>O = ((N ÷ M) * 100)</b>
<b>Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC</b> <i>(This should equal the number reported in Block E)</i>	<b>Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility</b>	<b>Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response</b>
119	65	54.63%

**Section 4: Pre-Paid ETCs**

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

**Is the ETC Pre-Paid?**      Yes       No

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

<b>P</b>	<b>Q</b>
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

**Signature Block**

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,  
Certified Online  
 Signature of Officer  
scott.mair@att.com  
 Email Address of Officer  
Tristan Reni  
 Person Completing This Certification Form

Scott A. Mair - SVP Technology Planning and Engineering  
 Printed Name and Title of Officer  
01/20/2015  
 Date  
425-580-6105  
 Contact Phone Number

### Affiliated ETCs

SAC	Name
549004	ATandT Corp.
639005	Cingular Wireless
259908	Cingular Wireless
399015	Cingular Wireless
529910	Cingular Wireless
539010	ATandT Mobility LLC
215191	BellSouth Telecommunications LLC
225192	BellSouth Telecommunications LLC
235193	BellSouth Telecommunications LLC
245194	BellSouth Telecommunications LLC
255181	BellSouth Telecommunications LLC
265182	BellSouth Telecommunications LLC
275183	BellSouth Telecommunications LLC
285184	BellSouth Telecommunications LLC
295185	BellSouth Telecommunications LLC
409034	Cricket Communications
459009	Cricket Communications
549009	Cricket Communications
469012	Cricket Communications
579006	Cricket Communications
229023	Cricket Communications
479014	Cricket Communications
349028	Cricket Communications
329017	Cricket Communications
419025	Cricket Communications
269035	Cricket Communications
189008	Cricket Communications
429012	Cricket Communications
239027	Cricket Communications
379024	Cricket Communications
499014	Cricket Communications
559014	
159025	Cricket Communications
309011	Cricket Communications
439053	Cricket Communications
539009	Cricket Communications
179017	Cricket Communications
249001	Cricket Communications
299024	Cricket Communications
449065	Cricket Communications
509008	Cricket Communications
199017	Cricket Communications
529017	Cricket Communications
339035	Cricket Communications
345070	Illinois Bell Telephone Company
325080	Indiana Bell Telephone Company Incorporated
315090	Michigan Bell Telephone Company
555173	Nevada Bell Telephone Company
209012	Cingular Wireless
269905	Cingular Wireless

