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May 16, 2012

By Electronic Mail and Overnight Mail

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

RE: AT&T Mobility Petition Docket UT-063060

Dear Mr. Danner:

Enclosed please find AT&T Mobility's Amended Petition for Request of Permanent Waiver for Two (2) Cell Sites or in the Alternate Extension for Compliance with WAC §480-123-070(6) and WAC §480-123-030(1)(g) ("Amended Petition").

A portion of AT&T Mobility's Amended Petition 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. Specifically AT&T Mobility is claiming confidential treatment for information in Exhibits A and D of its Amended Petition. 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 documents that AT&T Mobility claims are confidential include: Exhibit A which includes site identification, site name, estimated cost to install power and, Exhibit D which contains information regarding AT&T Mobility's backup power augmentation project. AT&T Mobility believes that all of these documents contain valuable proprietary information regarding AT&T Mobility's telecommunications network in Washington, the public disclosure of which would cause serious competitive harm to the company. Disclosure of these materials would reveal confidential details pertaining to AT&T Mobility's network infrastructure. Because this information goes to the heart of the company's business planning and competitive strategy, its public disclosure would be both economically damaging to AT&T Mobility

and economically advantageous to its competitors. The company does not generally disclose publicly this type of information.

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

Sincerely,

Sharon Mullin *by Dec with permission*

Sharon Mullin

Enclosure

cc: Jing Liu
William Weinman

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T Mobility's Request for Permanent Waiver or in the Alternate a Temporary Waiver of WAC 480-123-070(6) Regarding Eligible Telecommunications Carrier Requirements))))	Docket No. UT-063060 Amended Petition
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AMENDED REQUEST FOR PERMANENT WAIVER FOR TWO (2) CELL SITES OR IN THE ALTERNATE EXTENSION FOR COMPLIANCE WITH WAC 480-123-070(6) AND WAC 480-123-030(1)(g)

On April 12, 2012, New Cingular Wireless PCS, LLC and AT&T Mobility Wireless Operations Holdings, Inc. (collectively "AT&T Mobility") filed a request for a permanent waiver for sixteen (16) cells sites or in the alternate a one (1) year extension from the requirement to install four hours of backup power at these sixteen (16) cell sites in accordance with WAC 480-123-070(6) and WAC 480-123-030(1)(g). AT&T Mobility made the filing out of abundance of caution, as it was concerned with meeting the July 1, 2012 deadline due to the issues it was encountering with upgrading those cell sites to four hours of reliable backup power. However, despite filing the request AT&T Mobility continued to diligently work to install the required backup power at the sixteen cell sites. As a result of this continued work, AT&T Mobility now only needs to request a permanent waiver or in the alternate a one year extension for compliance with WAC 480-123-070(6) and WAC 480-123-030(1)(g) for two (2) cell sites.

1. **Amended Confidential Attachment A** provides the following updated information for the two remaining cell sites covered by this request: 1) the site identification, name and location; 2) estimated cost to install four hours of backup power; 3) the reason for the long time to upgrade; 4) the current backup power at the site.

2. AT&T Mobility is also providing in Confidential Exhibit D details on the cost of its Phase II implementation of the four hour backup power requirements. Specifically, the exhibit provides the number of cell sites per year that have been upgraded to four hours of backup power along with costs associated with these upgrades.
3. Installing four hours of backup power at the two cell sites covered by this request is simply not needed. As demonstrated in Confidential Exhibit B of AT&T Mobility's April 12, 2012 request, there is one hundred percent (100%) overlap coverage from adjacent cell sites(s) that have already been augmented with four hours of reliable backup power.
4. With the exception of the items mentioned herein, including the reduction of cell sites covered by the request from sixteen to two, the remaining portions of AT&T Mobility's request filed on April 12, 2012 remain unchanged.

IV. CONCLUSION

AT&T Mobility requests a permanent waiver for two (2) cell sites or in the alternate a one-year extension of time to install permanent backup power at two (2) cell sites within its ETC designated area.

Respectfully submitted on May 16, 2012.

New Cingular Wireless PCS, LLC and AT&T
Mobility Operations Holdings, Inc.

Cynthia J. Manheim by Doc with permission

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Amended Exhibit A

Site ID	Site Name	Revised Estimated Cost to Complete Permanent Solution¹	Long Lead Issue	Description	Current Battery Run Time (hours)
REDACTED	REDACTED	REDACTED	REDACTED	Zoning laws limit cabinet heights preventing AT&T Mobility from installing full size battery cabinets with the required batteries. If the permanent waiver request is not granted, a rented portable generator will be installed and wired (so that it turns on automatically with a power outage). This solution would remain in place until a zoning variance is obtained to install a full size cabinet with permanent batteries.	REDACTED
REDACTED	REDACTED	REDACTED	REDACTED	The current location of AT&T Mobility's equipment could not structurally handle the additional weight of the batteries required to meet the 4-hours of backup power. If the permanent waiver request is not granted, a rented portable generator will be installed and wired (so that it turns on automatically with a power outage). This solution would remain in place until all equipment, including batteries required to meet the 4-hour backup power requirement are installed in a new location.	REDACTED

¹ Despite this request, AT&T Mobility has been diligently working on the temporary solution of installing a portable generator and a long term permanent solution for each of these sites. ****Begin Confidential****

****End Confidential****. As such, even if the permanent waiver request is granted, AT&T Mobility will have costs associated with each of these sites.

Exhibit D – Cost Phase II Implementation

Year	Number Cell Sites Added 4 Hours Backup Power	ETC Support Utilized
2010	REDACTED	REDACTED
2011 ²	REDACTED	REDACTED
2012 (Estimated in Sept. 2011 filing)	REDACTED	REDACTED
2012 – Current estimate if request not granted	REDACTED	REDACTED
2012 – Current estimate if request is granted for the 2 cell sites	REDACTED	REDACTED ³

² In its September 9, 2011 ETC Certification filing with the Commission, AT&T Mobility estimated that it would complete backup power augmentation on 316 sites in 2011. In fact, AT&T Mobility was able to complete the backup power augmentation on 11 more sites that expected for a total of 327 in 2011.

³ Despite this request, AT&T Mobility has been diligently working on the temporary and long term solutions. As such, even if the permanent waiver request is granted, AT&T Mobility will have incurred costs for each of these sites. ****Begin Confidential****
****End Confidential**** Even if the permanent waiver request is granted, AT&T Mobility will have costs associated with each of these sites, and is unable to estimate at this time the reduction in ETC support that will be utilized if the permanent waiver is granted.