



Sharon Mullin
Director
External Affairs

2003 Point Bluff
Austin, TX 78746

T: 512-330-1698
F: 832 213-0203
smullin@att.com

August 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: 2012 ETC Certification - AT&T Mobility

Dear Mr. Danner:

Enclosed please find an Amended Exhibit K of AT&T Mobility's Annual Eligible Telecommunications Carrier Report and Future Annual Plan ("Report") that was initially filed on July 30, 2012 pursuant to WAC 480-123-060 and WAC 480-123-070. Some of the information for 2013 has changed.

Consistent with the initial filing, AT&T Mobility claims that Amended Exhibit K 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 version of Amended Exhibit K has been printed on yellow paper, marked "Confidential per WAC 480-07-160" and is enclosed in a separate envelope marked "Confidential per WAC 480-07-160".

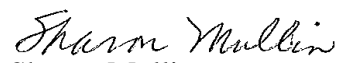
AT&T Mobility states as follows the legal basis under which the information is claimed to be confidential. Pursuant to WAC 480-07-160(2)(c) confidential treatment may be afforded to "valuable commercial information, including trade secrets... cost, or financial information, or customer-specific usage and network configuration and design information, as provided in RCW 80.04.095." Amended Exhibit K reflects in granular detail the locations of the network improvements AT&T Mobility performed in calendar year 2011 and the locations of its expenditures for capital improvements and other eligible improvements to the network that it plans to make in 2012 and 2013. AT&T Mobility believes that the document contains 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 the information would reveal confidential details pertaining to AT&T Mobility's network infrastructure, customer base, marketing strategies and the company's competitive

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position in the Washington telecommunications marketplace. 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

Enclosures

CONFIDENTIAL PER WAC 480-07-160

**Exhibit K
Map**

**Cell sites as of End of Year 2011, Projected End of Year 2012,
and Projected End of Year 2013**

REDACTED