



Sharon Mullin
Director – External Affairs
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Austin, TX 78746
Phone: 512 330-1698
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October 15, 2013

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: Annual ETC Recertification Reports required by FCC of AT&T Mobility
Docket UT-131418**

Dear Mr. King:

Pursuant to section 54.313(i) of the Federal Communications Commission's ("FCC's") rules,¹ AT&T Mobility LLC hereby provides a copy of its FCC Form 481, Carrier Annual Reporting Data Collection Form that it filed with the Universal Service Administrative Company on October 11, 2013 and that it will file with the FCC when the federal government reopens. All eligible telecommunication carriers that receive high-cost and/or low income support must file Form 481 with the FCC in order to continue receiving such support. In a public notice released August 6, 2013, the FCC established October 15, 2013 as the Form 481 filing deadline this year.

The collection of data and information contained in FCC Form 481 is done under the FCC's authority in section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, and sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422. The FCC anticipates that state commissions will use the data contained in carriers' FCC Form 481 filings to develop their section 54.314 certifications.² This year, such certifications are due on or before December 16, 2013.³

A portion of AT&T Mobility's Report 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

¹ 47 C.F.R. § 54.313(i).

² See 47 C.F.R. § 54.314(a); *Connect America Fund*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶ 612 (2011).

³ *Wireline Competition Bureau Announces Filing Deadline of October 15, 2013 for Eligible Telecommunications Carriers to File High-Cost and Low-Income Annual Reports, and Announcing Filing Deadline of December 16, 2013 for States and ETCs to File Annual Use Certifications*, DA 13-1707, Public Notice (rel. Aug. 6, 2013).

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 the following confidential information: 1) Service Outage Reporting data; 2) Improvement Plans for Calendar years 2012 and 2014; and 3) AT&T Mobility coverage Maps. 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: 1) Line 200 Attachments, which includes service Outage Reporting data and customer impact counts and resolution information not available to the public; 2) Line 100 Attachments, including the Improvement plans for 2012 and 2014 and provide detailed line count information by wire center and status of the network improvements AT&T Mobility has undertaken for calendar year 2012 and a description of the amounts of its expenditures for capital improvements and other eligible improvements to the network that it plans to make in 2014; and 3) Coverage Maps showing detailed geographic plant additions for 2012, 2013 and 2014. AT&T Mobility believes that all of these documents contain proprietary business and technical 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, customer base, marketing strategies and the company's competitive 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

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB 3060-0986 OMB 3060-0819 Avg. Burden Estimate per Respondent: 20 Hours
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<010> Study Area Code	529910
<015> Study Area Name	AT&T Mobility LLC
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Vonda T Long-Dillard
<035> Contact Telephone Number: Number of the person identified in data line <030>	(202) 457-2043
<039> Contact Email: Email of the person identified in data line <030>	vl4468@att.com

ANNUAL REPORTING FOR ALL CARRIERS			54.313 Completion Required	54.422 Completion Required	
<i>(check box when complete)</i>					
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>		
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input type="checkbox"/> <-- check box if no outages to report					
<300> Unfulfilled Service Requests (voice)		<table border="1" style="width: 30px; height: 20px;"><tr><td style="text-align: center;">1</td></tr></table>	1	<input checked="" type="checkbox"/>	
1					
<310> Detail on Attempts (voice)	<i>(attach descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<320> Unfulfilled Service Requests (broadband)					
<330> Detail on Attempts (broadband)	<i>(attach descriptive document)</i>				
<400> Number of Complaints per 1,000 customers (voice)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<410> Fixed					
<420> Mobile		0.23729			
Number of Complaints per 1,000 customers (broadband)					
<440> Fixed					
<450> Mobile					
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<510>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<610>	<i>(attached descriptive document)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>				
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>				
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)?	<i>(if yes, complete attached worksheet)</i>		N		
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>				
<1010>	<i>(attach descriptive document)</i>				
<1100> Terrestrial Backhaul (Y/N)?	<i>(if not, check to indicate certification)</i>				
<1110>	<i>(complete attached worksheet)</i>				
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>			<input checked="" type="checkbox"/>	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000> (check to indicate certification)
<2005> (complete attached worksheet)

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> (check to indicate certification)
<3005> (complete attached worksheet)

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	529910
<015> Study Area Name	AT&T Mobility LLC
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035> Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039> Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com

<110> Has your company received its ETC certification from the FCC?	(yes / no)	no
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?		
<111>	(yes / no)	

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which receives only frozen support, your progress report is only required to address voice telephony service	529910WA112
Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	
Name of Attached Document (.pdf)	

<113> Maps detailing progress towards meeting plan targets	<input checked="" type="checkbox"/>
<114> Report how much universal service (USF) support was received	<input checked="" type="checkbox"/>
<115> How (USF) was used to improve service quality	<input checked="" type="checkbox"/>
<116> How (USF) was used to improve service coverage	<input checked="" type="checkbox"/>
<117> How (USF) was used to improve service capacity	<input checked="" type="checkbox"/>
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	<input checked="" type="checkbox"/>

LINE 200 ATTACHMENT

**REDACTED – FOR PUBLIC
DISCLOSURE**

(800) Operating Companies and Affiliates		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986
		OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	529910
<015>	Study Area Name	AT&T Mobility LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039>	Contact Email Address - Email Address of person identified in data line <030>	vi4468@att.com

<810>	Reporting Carrier	AT&T Mobility LLC
<811>	Holding Company	SBC Telecom; SBC Long Distance; BellSouth Mobile Data, Inc.
<812>	Operating Company	AT&T Mobility Corporation

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	AT&T Communications of New York	159010	Ceased being ETC on 8/1/13
	AT&T CORP	549004	AT&T Corp.
	AT&T MOBILITY, LLC	199009	AT&T Mobility
	AT&T MOBILITY, LLC	259908	AT&T Mobility
	AT&T MOBILITY, LLC	399015	AT&T Mobility
	AT&T MOBILITY, LLC	529910	AT&T Mobility
	AT&T MOBILITY, LLC	539010	AT&T Mobility
	AT&T MOBILITY PUERTO RICO, INC	639005	AT&T Mobility
	BELLSOUTH TELECOMMUNICATIONS, LLC	215191	AT&T Florida
	BELLSOUTH TELECOMMUNICATIONS, LLC	225192	AT&T Georgia
	BELLSOUTH TELECOMMUNICATIONS, LLC	235193	AT&T North Carolina
	BELLSOUTH TELECOMMUNICATIONS, LLC	245194	AT&T South Carolina
	BELLSOUTH TELECOMMUNICATIONS, LLC	255181	AT&T Alabama
	BELLSOUTH TELECOMMUNICATIONS, LLC	265182	AT&T Kentucky
	BELLSOUTH TELECOMMUNICATIONS, LLC	275183	AT&T Louisiana
	BELLSOUTH TELECOMMUNICATIONS, LLC	285184	AT&T Mississippi
	BELLSOUTH TELECOMMUNICATIONS, LLC	295185	AT&T Tennessee
	ILLINOIS BELL TELEPHONE COMPANY	345070	AT&T Illinois
	INDIANA BELL TELEPHONE COMPANY, INC	325080	AT&T Indiana
	MICHIGAN BELL TELEPHONE COMPANY	315090	AT&T Michigan
	NEVADA BELL TELEPHONE COMPANY	555173	AT&T Nevada
	NEW CINGULAR WIRELESS PCS, LLC	209012	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	269905	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	279010	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	289912	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	319026	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	339920	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	389015	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	409004	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	449022	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	479006	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	619004	AT&T Mobility
	PACIFIC BELL TELEPHONE COMPANY	545170	AT&T California
	SOUTHWESTERN BELL TELEPHONE COMPANY	405211	AT&T Arkansas
	SOUTHWESTERN BELL TELEPHONE COMPANY	415214	AT&T Kansas
	SOUTHWESTERN BELL TELEPHONE COMPANY	425213	AT&T Missouri
	SOUTHWESTERN BELL TELEPHONE COMPANY	435215	AT&T Oklahoma
	SOUTHWESTERN BELL TELEPHONE COMPANY	445216	AT&T Texas
	THE OHIO BELL TELEPHONE COMPANY	305150	AT&T Ohio
	THE SOUTHERN NEW ENGLAND TELEPHONE CO.	135200	AT&T Connecticut
	WISCONSIN BELL, INC	335220	AT&T Wisconsin
	NEW CINGULAR WIRELESS PCS, LLC (f/k/a Allied Wireless of the Palmetto State, LLC)	249020	U-LIFELINE WIRELESS
	GEORGIA RSA#8 PARTNERSHIP	229014	ALLIED WIRELESS
	Corr Wireless Communications, LLC	259005	Corr Wireless

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	529910
<015>	Study Area Name	AT&T Mobility LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035>	Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039>	Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com

<910> Tribal Land(s) on which ETC Serves

Chehalis, Coeur d'Alene, Colville. Hoh, Jamestown S'Klallam, Kalispel Reservation, Lower Elwha, Lummi, Muckleshoot, Nisqually, Nooksack, Port Gamble, Port Madison Puyallup, Quileute, Quinault, Samish, Sauk-Suiattle, Skokomish, Spokane, Squaxin Island, Stillaguamish Reservation, Swinomish, Tulalip, Upper Skagit, Yakama
(No High Cost Funds were spent in the Tribal Lands)

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px 5px;">Select (Yes,No, NA)</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> <tr> <td style="padding: 2px 5px;">NA</td> </tr> </table>	Select (Yes,No, NA)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Select (Yes,No, NA)												
NA												
NA												
NA												
NA												
NA												
NA												
NA												
NA												
NA												
<922>	Feasibility and sustainability planning;	NA										
<923>	Marketing services in a culturally sensitive manner;	NA										
<924>	Compliance with Rights of way processes	NA										
<925>	Compliance with Land Use permitting requirements	NA										
<926>	Compliance with Facilities Siting rules	NA										
<927>	Compliance with Environmental Review processes	NA										
<928>	Compliance with Cultural Preservation review processes	NA										
<929>	Compliance with Tribal Business and Licensing requirements.	NA										

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986
	OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	529910
<015> Study Area Name	AT&T Mobility LLC
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Vonda T Long-Dillard
<035> Contact Telephone Number - Number of person identified in data line <030>	(202) 457-2043
<039> Contact Email Address - Email Address of person identified in data line <030>	vl4468@att.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	Name of attached document (.pdf)
<1220> Link to Public Website	HTTP http://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.isp


Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0819 July 2013
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<010> 529910
 <015> AT&T Mobility LLC
 <020> 2014
 <030> Vonda T Long-Dillard
 <035> (202) 457-2043
 <039> vl4468@att.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

I certify that I am an officer ^{*(see Title or position of Authorized Officer below)} of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: AT&T Mobility LLC	
Signature of Authorized Officer: 	Date: 10/10/13
Printed name of Authorized Officer: Michael C. Maxwell	
Title or position of Authorized Officer: *Vice President/General Manager Pacific Northwest	
Telephone number of Authorized Officer: (503)691-5000	
Study Area Code of Reporting Carrier: 529910	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

LINE 100 ATTACHMENTS

**REDACTED – FOR PUBLIC
DISCLOSURE**

EXHIBIT 529910WA310

AT&T MOBILITY'S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2012 CALENDAR YEAR

Number of Unfulfilled Requests for Service	Description of How Service Was Attempted
1	<p>Section 54.313(a)(3) of the Commission's rules requires an ETC to report the number of requests for service from potential customers within the ETC's designated service area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. In response to a request for service, AT&T Mobility takes the following steps:</p> <ol style="list-style-type: none"> 1) AT&T Mobility will provide service on a timely basis to requesting customers within AT&T Mobility's service area where AT&T Mobility's network already passes the potential customer's premises; 2) If a customer cannot be served by AT&T Mobility's existing facilities, AT&T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by: <ol style="list-style-type: none"> a) Modifying or replacing the requesting customer's equipment; b) Deploying a roof-mounted antenna or other equipment; c) Adjusting the nearest cell tower; d) Adjusting network or customer facilities e) Reselling services from another carrier's facilities to provide service; or f) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. <p>If, after these steps, the customer cannot be served, AT&T Mobility will notify the customer and provide the Commission with an annual report of how many requests for service could not be filled.</p>

Steve Largent
President/CEO

August 27, 2012

Mr. Ralph de la Vega
President and Chief Executive Officer
AT&T Mobility & Consumer Markets
AT&T
1025 Lenox Park Boulevard, Suite B650
Atlanta, GA 30319


Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility has completed the recertification process for the CTIA Business Continuity/Disaster Recovery Program ("Program") for the period July 1, 2012– June 30, 2013. CTIA deems AT&T Mobility is compliant with the principles and objectives of the Program and confirms AT&T Mobility has recertified that it has implemented and maintained the requirements set forth in the Program.

Please ensure that the relevant employees of AT&T Mobility are aware of your recertification status. If you should have any questions concerning the certification process, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or maltschul@ctia.org.

CTIA commends AT&T Mobility for its ongoing leadership and participation in the CTIA Business Continuity/Disaster Recovery Program, and we look forward to continuing to work with AT&T Mobility on this important industry initiative.

Sincerely,


Steve Largent

cc: Bruce Lundeen
BCP Standards & Practices
AT&T Business Continuity Planning



Steve Largent
President/CEO

August 16, 2012

Mr. Ralph de la Vega
President and CEO
AT&T Mobility Services, LLC
1025 Lenox Park Boulevard, B650
Atlanta, GA 30319

Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility (“AT&T”) has completed the recertification process for the CTIA Consumer Code for Wireless Service (“Voluntary Consumer Code”) for the period January 1, 2012 – December 31, 2012, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, AT&T is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of AT&T review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, we will provide two specimens (color and black/white) of the Seal for AT&T’s use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Michael Altschul, CTIA’s Senior Vice President & General Counsel, at (202) 736-3248 or maltschul@ctia.org.

CTIA commends AT&T for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with AT&T on this important industry initiative.

Sincerely,

Congratulations!



Steve Largent

Attachment

cc: Martin Grambow

EXHIBIT 529901WA510

SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

EXHIBIT 529910WA610

AT&T MOBILITY'S CERTIFICATION REGARDING ITS ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Section 54.313(a)(6) of the Commission's Rules requires an ETC to certify an ability to function in emergency situations as set forth in section 54.202(a)(2) of the Commission's Rules. Furthermore, the State of Washington requires an ETC to annually 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, backup generators at each microwave hub, and at least five hours back up battery power and backup generators at each switch." The standards set forth in section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities and a capability to manage traffic spikes resulting from emergency situations. AT&T Mobility has in place emergency operation procedures so that it can function in an emergency. Backup power is provided at switch locations and cell sites through a combination of batteries, portable and permanent generators. AT&T Mobility also has mobile switches and portable COWs (Cells on Wheels) that it can deploy in the event of an emergency. Based on the foregoing, AT&T Mobility certifies it is able to function in emergency situations as set forth in section 54.202(a)(2) and as required by the State of Washington.