



October 15, 2013

Via Hand-Delivery and/or Electronic Filing

Office of the Secretary
Federal Communications Commission
445 12th Street, SW – Room TW-A325
Washington, DC 20554

Vice President – High Cost and Low Income Division
Universal Service Administration Company
2000 L Street, NW – Suite 200
Washington, DC 20036

Re: Docket No. 10-90; Form 481 - Carrier Annual Reporting
Filing Entity: T-Mobile West LLC
State of Washington
Study Area Codes:

- 529013 (Legacy Support)
- 528001 (Mobility Fund T-Mobile)
- 528002 (Mobility Fund T-Mobile)
- 528003 (Mobility Fund T-Mobile)

T-Mobile USA, Inc., on behalf of its wholly-owned subsidiary, T-Mobile West LLC (“T-Mobile”), submits the attached Form 481 – Carrier Annual Reporting for its designation as an Eligible Telecommunications Carrier in the state of Washington, consistent with the rules and orders of the Federal Communications Commission (“FCC”), including 47 C.F.R. §§ 54.313 and 54.422. T-Mobile completed the attached Form 481 pursuant to the Instructions for Completing FCC Form 481 (“Instructions”) and, as explained below, in accordance with the rules and orders of the FCC. By including documentation requested by the Form 481 and Instructions, T-Mobile does not waive its rights or otherwise concede that this documentation is required under the FCC’s rules. In certain instances, as explained below, the Form 481 and Instructions do not require the submission of information that appears to be required by the FCC rules and orders; nevertheless, T-Mobile provides this information consistent with the rules and orders of the FCC. Specifically:

- Service Quality worksheet lines 110 – 112 and the Instructions do not require the submission of a Five-Year Service Quality Improvement Plan and annual Progress Report, unless the carrier was designated as an ETC by the FCC; however, the FCC has made clear in its rules and orders that all ETCs must submit a Progress Report on its Five-Year Service Quality Improvement Plan and therefore, to the extent not already on file with the FCC, T-Mobile is submitting

its Five-Year Service Quality Improvement Plan, along with its Progress Report on this plan.

- Lines 320 and 330 and the Instructions provide for the reporting of unfulfilled service requests for broadband, which the FCC has clarified is not required for competitive ETC recipients of high cost legacy support, and therefore T-Mobile is not reporting this information.
- Lines 440 and 450 and the Instructions provide for the reporting of complaints related to broadband service, which the FCC has clarified is not required for competitive ETC recipients of high cost legacy support, and therefore T-Mobile is not reporting this information.
- Line 510 and the Instructions require ETCs to attach a descriptive document explaining how an ETC complied with the applicable service quality standards and consumer protection rules; however, 47 C.F.R. § 54.313(a)(5) and 47 C.F.R. § 54.422(b)(3) only require ETCs to certify compliance with applicable service quality standards and consumer protection rules. Without waiving its objections to providing additional information not required by the FCC rules, T-Mobile is submitting documentation of its compliance with applicable service quality standards and consumer protection rules.
- Line 610 and the Instructions require ETCs to attach a descriptive document explaining how an ETC is able to function in emergency situations; however, 47 C.F.R. § 54.313(a)(6) and 47 C.F.R. § 54.422(b)(4) only require ETCs to certify that they are able to function in emergency situations. Without waiving its objections to providing additional information not required by the FCC rules, T-Mobile is submitting documentation explaining how it is able to function in emergency situations.
- Lines 700 and 710 provide for the completion of the attached worksheet for voice and broadband price offerings; however, the worksheet is not attached to Form 481 and the Wireline Competition Bureau has not, to date, specified the format of the submission of price offerings as required by 47 C.F.R. § 54.313(a)(7), and therefore T-Mobile is not submitting this information.
- Lines 1000 and 1010 only apply to ETCs providing fixed voice services and therefore is not applicable to T-Mobile.

Any questions concerning this filing should be directed to the undersigned.

Respectfully submitted,



Rhonda R. Thomas
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Enclosure