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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: 2011 ETC Certification - AT&T Mobility

Dear Mr. Danner:

Enclosed please find a copy of Amended Exhibits F and K of AT&T Mobility's Annual Eligible Telecommunications Carrier Report and Future Annual Plan ("Report") filed pursuant to WAC 480-123-060 and WAC 480-123-070, which has also been filed electronically.

Amended Exhibits F and K contain 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 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 F contains detailed information about the status of AT&T's backup power augmentation project; and, Exhibit K reflects in granular detail the amounts of its expenditures for capital improvements and other eligible improvements to the network that it plans to make in 2012. 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 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 by Joe with permission

Sharon Mullin

Enclosures

AT&T Mobility (SAC 529910) Amended Confidential Exhibits F and K

September 9, 2011

CONFIDENTIAL PER WAC 480-07-160

AMENDED – EXHIBIT F

AT&T Back-Up Power Compliance Report: Non-Priority Sites

****REDACTED****

CONFIDENTIAL PER WAC 480-07-160

AMENDED – EXHIBIT F

Summary Back-up Power Compliance:

Year	Back-up Power Upgrades to Non-Priority Cell Sites	ETC Support
2010	REDACTED	REDACTED
2011	REDACTED	REDACTED
2012	REDACTED	REDACTED
Total	REDACTED	REDACTED

*As these are the more difficult and costly sites to upgrade to 4-hours of backup power it may actually cost more than this estimate to upgrade the remaining cell sites.

CONFIDENTIAL PER WAC 480-07-160

Exhibit K – Amended

**Annual Plan for Universal Service Support Expenditures for
October 1, 2011 through December 31, 2012¹**

AT&T Mobility projects that it will receive **REDACTED** for its entire ETC designated area in Washington for January 1 – December 31, 2012.

As the Commission is aware, the amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC and the number of AT&T subscribers that have service in a particular wire center. In addition, there are a number of matters currently pending before the FCC that, if adopted, could greatly impact the amount of funding available for CETCs. If the federal high cost support that AT&T Mobility receives is less than it currently anticipates, AT&T Mobility may reduce or eliminate some projects included in its plan for 2012.

In general the capital expenditures listed below increase the coverage, capacity, and reliability of AT&T Mobility's network in its ETC designated area in Washington.

Item	Description	Planned Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED

¹ AT&T Mobility understands that the Washington rule only requires it to provide planned expenditure information through September 30, 2011; however, AT&T Mobility's plans are on a calendar year basis.

Item	Description	Planned Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
Total		REDACTED