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June 30, 2017

Via Electronic 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-170011**

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 FCC on June 23, 2017. All eligible telecommunication carriers that receive high-cost and/or low income support must file Form 481 by July 1 with the FCC in order to continue receiving such support.

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

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 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 Service Outage Reporting data. The unredacted confidential document has been marked "Confidential per WAC 480-07-160" and is filed electronically as a confidential document.

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

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).

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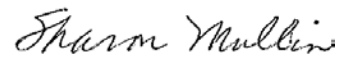
afforded to “valuable commercial information, including trade secrets... cost, or financial information, or customer-specific usage and network configuration and design information, as provided in RCW 80.04.095.”

The documents that AT&T Mobility claims are confidential include the Line 200 Attachments, which includes service Outage Reporting data and customer impact counts and resolution information not available to the public. AT&T Mobility believes that the document contains 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 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.

Further, similar outage information is afforded confidential protection by the FCC pursuant to 47 C.F.R. §4.2 for a number of reasons including those regarding security of the telecommunications network.

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

Sincerely,


Sharon Mullin

Enclosures