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August 26, 2014

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:** Erratum - Annual ETC Recertification Reports of AT&T Mobility Docket UT-143013

Dear Mr. King:

On June 30, 2014 and pursuant to section 54.313(i) of the Federal Communications Commission's ("FCC's") rules,<sup>1</sup> AT&T Mobility LLC ("AT&T Mobility") provided a copy of its FCC Form 481, Carrier Annual Reporting Data Collection Form that it filed with the FCC. 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.

AT&T Mobility recently learned that due to a system error, three attachments to the 2014 Form 481 were inadvertently omitted from the filing as explained in the attached letter sent to the FCC. The following attachments are therefore included with this erratum submittal: description of unfulfilled voice telephony service requests resolution process (Line 310), description of compliance with Service Quality and Consumer Protection (Line 510) and description of Functionality in Emergency Situations (Line 610).

AT&T Mobility apologizes for any inconvenience this may have caused.

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

Sincerely,

Sharm Mullin Sharon Mullin

Enclosures

<sup>1</sup> 47 C.F.R. § 54.313(i).



**Anisa A. Latif** Associate Director Federal Regulatory AT&T Services. Inc. 1120 20<sup>th</sup> Street, N.W., Suite 1000 Washington, D.C. 20036

202.457.3068 Phone 202.457.3071 Fax <u>al7161@att.com</u> E-mail

August 18, 2014

Via Electronic Submission

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW 12<sup>th</sup> Street Lobby – TW-A325 Washington, D.C. 20554

## RE: ERRATUM - FCC Form 481 – Carrier Annual Reporting Data Collection Form (Sections 54.313 and 54.422 Annual Reporting) WC Docket Nos. 10-90; 11-42

Dear Ms. Dortch:

AT&T Services, Inc., on behalf of certain wireless affiliates (collectively, AT&T)<sup>1</sup>, hereby submits three attachments to these affiliates' 2014 FCC Forms 481 – Carrier Annual Reporting Data Collection Form, which were officially filed with the Commission on June 27, 2014 via the Electronic Comment Filing System. AT&T recently learned that three attachments were inadvertently omitted from its Commission filings due to a system error. AT&T certified and submitted complete FCC Form 481 filings to USAC on June 23, 2014; however the printed copies of those complete filings generated by USAC's E-file system omitted the following attachments: description of unfulfilled voice telephony service requests resolution (Line 310), description of compliance with Service Quality and Consumer Protection (Line 510) and description of Functionality in Emergency Situations (Line 610). AT&T provides those attachments here. I apologize for any inconvenience this may have caused.

Should you have any questions, feel free to contact me.

Sincerely,

<u>/s/ Anisa A. Latif</u> Anisa A. Latif

Attachments

<sup>&</sup>lt;sup>1</sup> Study Area Codes 619004, 389015, 539010, 399015 and 529910.

# AT&T MOBILITY'S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2013 CALENDAR YEAR

Number of Unfulfilled Requests for Service	Description of How Service Was Attempted
	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:
	<ol> <li>AT&amp;T Mobility will provide service on a timely basis to requesting customers within AT&amp;T Mobility's service area where AT&amp;T Mobility's network already passes the potential customer's premises;</li> </ol>
	<ol> <li>If a customer cannot be served by AT&amp;T Mobility's existing facilities, AT&amp;T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by:</li> </ol>
	<ul> <li>a) Modifying or replacing the requesting customer's equipment;</li> </ul>
	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.
	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.

Expanding the Wireless Frontier



Steve Largent President/CEO

June 18, 2013

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, 2013 – December 31, 2013, 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 <u>maltschul@ctia.org.</u>.

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.

Great work!

Sincerely,

Steve Largent

cc: Martin Grambow, SVP, General Counsel & Secretary Errol S. Phipps, General Attorney

Attachment





## 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.



#### **Functionality in Emergency Situations Certification**

Section 54.313(a)(6) requires an ETC to certify it is able to function in emergency situations as set forth in C.F.R. Section 54.202(a)(2). 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 LLC 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 and portable and/or permanent generators. AT&T Mobility LLC 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 LLC certifies it is able to function in emergency situations as forth in C.F.R. Section 54.202(a)(2).

Expanding the Wireless Frontier



Steve Largent President/CEO

September 11, 2013

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, 2013– June 30, 2014. 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 <u>maltschul@ctia.org</u>.

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.

Thurs for leading . Ralph !

Sincerely,

Steve Largent

cc: Bruce Lundeen, MBCP, MBCI BCP Standards & Practices Business Continuity Planning

