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July 31, 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: 2014 ETC Certification - AT&T Mobility**

Dear Mr. King:

Enclosed please find a copy 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.

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 Exhibits B – E, J - K. 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: Exhibits B, J - K which reflect in granular detail the status of the network improvements AT&T Mobility has undertaken for calendar year 2013 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 2015; Exhibit D contains information about customer locations; and, Exhibit E contains customer complaint information by type of complaint that is not generally disclosed to the public.

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, customer base, 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.

AT&T Mobility's report of outages in Exhibit C is also highly proprietary and its disclosure could cause competitive harm to the company as well as providing information that would reveal or otherwise identify potential weakness in the telecommunications system that could be taken advantage of. If a competitor accessed information regarding the number and duration of the company's outages, and the company's response to outages, the competitor could gain an enhanced understanding of AT&T Mobility's infrastructure and technology, including its relatively strong and weak points. 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.

Please note that in its 2013 ETC Certification filed on July 31, 2013 pursuant to WAC 480-123-080(3), AT&T Mobility included a disc containing a map in .shp format showing the general location where it provides commercial mobile radio signals. This information is required to be filed every three (3) years, so it is not included in this filing.

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

Sincerely,

  
Sharon Mullin

Enclosures

## **AT&T Mobility (SAC 529910) Annual Eligible Telecommunications**

### **Carrier Report for 2013 and 2015 Annual Plan**

AT&T Mobility, study area code (“SAC”) 529910,<sup>1</sup> submits its Annual Eligible Telecommunications Carrier Report for 2013 (“2013 Report”) and Annual Plan for 2015<sup>2</sup> in accordance with the rules that apply to Eligible Telecommunications Carriers (“ETCs”).

#### **I. AT&T MOBILITY ETC REPORT FOR 2013**

##### **A. Annual Certification of Eligible Telecommunications Carriers**

With this filing AT&T Mobility is requesting continued certification as an ETC in Washington. In accordance with WAC 480-123-060 and 47 CFR §54.314, AT&T Mobility provides a certification in **Exhibit A** that all federal universal service support was used in the preceding calendar year (2013) and will be used in the coming calendar year (2015) for the “provision, maintenance, and upgrading of facilities and services for which the support is intended.”

##### **B. Report as Required by WAC 480-123-070 for Calendar Year 2013**

###### **1. Report on use of federal universal service funds and benefits to consumers (WAC 480-123-070(1)(a) and (b))**

Information on the amount of federal high cost universal service support received by AT&T Mobility and how that support was spent on the provision, maintenance and upgrade of facilities and services for which the support is intended is attached hereto as **Confidential Exhibit B**.

###### **2. Local Service Outage Reports (WAC 480-123-070(2))**

AT&T Mobility’s local service outage report for calendar year 2013 is attached hereto as **Confidential Exhibit C**. The report includes information on every outage impacting the supported services that was

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<sup>1</sup> The Commission designated AT&T Mobility as an eligible telecommunications carrier (“ETC”) in certain areas in Washington by Order dated April 29, 2005 in Docket UT-043011 which was expanded by Order 03 dated October 15, 2009 in the same docket. On May 31, 2012, AT&T Mobility notified the Commission that there had been some legal entity changes concerning AT&T Mobility’s ETC designation in Washington. *See* In the Matter of the Petition of Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; New Cingular Wireless PCS, LLC; and Olympia Cellular Telephone Company, Inc., d/b/a Cingular Wireless, LLC for Designation as an Eligible Telecommunications Carrier, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, Order No. 02 (April 29, 2005); New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company; and Olympia Cellular Telephone Company Inc. d/b/a AT&T Mobility For Amendment of its Designation as an Eligible Telecommunications Carrier to Include Additional Wire Centers, Order Granting Amendment of Designation as an Eligible Telecommunications Carrier to Include Wire Centers in Washington Rural Service Area 2 and 3, Docket UT-04-3011, Order 03 (October 15, 2009); and, Letter to David W. Danner, UTC, from Sharon Mullin, AT&T (May 31, 2012).

<sup>2</sup> As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner for its 2013 Report and 2015 Annual Plan.

thirty minutes or longer in duration and includes: (a) date and time of onset and duration; (b) description of the outage; (c) particular services affected; (d) geographic area affected; (e) steps taken to prevent a similar situation in the future; and (f) estimated number of customers affected.

The information required by this rule is broad and overly inclusive such that it contains outages of minimal, if any, impact to consumers. For example, the report includes situations where a single sector of a cell site was not available for thirty minutes even though customers were still receiving service from other sectors of the cell site. Further, due to system limitations the information provided in the report is for the entire state of Washington and not just the areas in which AT&T Mobility is designated as an ETC.

### **3. Report on failure to provide service (WAC 480-123-070(3))**

AT&T Mobility had three (3) unfulfilled request for service in calendar year 2013. AT&T Mobility has employed the standard adopted by the Federal Communication Commission (“FCC”) in 47 C.F.R. §54.202(a)(1)(B) for evaluating requests for service. The details of the unfulfilled request for service is attached hereto as **Confidential Exhibit D**.

AT&T Mobility has committed to provide service throughout its proposed designated service area to all customers making a reasonable request for service. AT&T Mobility provides service on a timely basis to requesting customers within the applicant’s service area where the applicant’s network already passes the potential customer’s premises; and provides service within a reasonable period of time, if the potential customer is within the applicant’s licensed service area but outside its existing network coverage. AT&T Mobility has determined that these unfulfilled request for service cannot be provided at reasonable cost by:

- (1) Modifying or replacing the requesting customer’s equipment;
- (2) Deploying a roof-mounted antenna or other equipment;
- (3) Adjusting the nearest cell tower;
- (4) Adjusting network or customer facilities;
- (5) Reselling services from another carrier’s facilities to provide service; or
- (6) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

### **4. Report on complaints per 1,000 handset/lines (WAC 480-123-070(4))**

AT&T Mobility’s report with separate totals for the numbers of complaints from customers in Washington made to the FCC and the consumer protection division of the office of the attorney general of Washington is attached hereto as **Confidential Exhibit E**. This exhibit list the type of complaint and whether the complaint was resolved to the customer’s satisfaction. In some cases, AT&T Mobility was not able to reach the customer to discuss the complaint.

### **5. Compliance with applicable service quality standards (WAC 480-123-070(5))**

For wireless carriers the rule requires a commitment to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service (“Code”). On an annual basis AT&T Mobility completes a certification process with CTIA. For 2013, AT&T Mobility certified to CTIA that it had adopted the principles, disclosures and practices set forth in the CTIA Code. Included in **Exhibit A** is AT&T Mobility’s certification of substantial compliance with this requirement.

## 6. Certification of the ability to function in emergency situations (WAC 480-123-070(6))

To comply with this requirement an ETC must 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, back up generators at each microwave hub, and at least five hours back up battery power and back up generators at each switch.”

AT&T Mobility complies with the backup power requirement for its switches and microwave hubs within its ETC designated area. AT&T Mobility also complies with the backup power requirement for cell sites as it has interpreted this requirement.<sup>3</sup> Included in **Exhibit A** is AT&T Mobility’s certification of substantial compliance with this requirement.

## 7. Advertising certification, including advertisements on Indian reservations (WAC 480-123-070(7)).

The certification for this section is included in **Exhibit A**.

AT&T Mobility is committed to publicizing the availability of its Lifeline Service in a manner that is reasonably designed to reach those likely to qualify for the service. In that regard, AT&T Mobility engaged in the activities listed below in 2013 to support its Lifeline Service program.

- Maintained a dedicated, bi-lingual Lifeline Customer Care team supporting Lifeline Service through the following toll free number, 800-377-9450;
- Offered Lifeline brochures in English and Spanish with information about the company’s Lifeline offering, including pricing information and eligibility criteria. **Exhibit F** is an example of AT&T Mobility’s Lifeline brochure available in 2013 for tribal and non-tribal areas;
- Maintained a dedicated Lifeline website with information about Lifeline Service along with an application [www.att.com/mobility-lifeline](http://www.att.com/mobility-lifeline);
- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, an example of AT&T Mobility’s Lifeline advertisement for 2013 is included in **Exhibit G**. **Exhibit H** contains a list of publication names and dates;
- Continued its monthly direct mail campaign in its ETC designated area to publicize the availability of the Lifeline Service to targeted households below the poverty line or on government assistance based on census information obtained by AT&T Mobility. **Exhibit I** is the postcard used for this direct mail campaign;
- AT&T Mobility contacted various social service agencies/groups about its Lifeline Service; and,

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<sup>3</sup> Cell site” is not defined in the Commission’s regulations. AT&T Mobility interprets the term “cell site” as excluding distributed antenna systems (“DAS”) or similar systems such as in-building small cells, which generally have a different character and use than a “traditional” cell site which has antennas mounted on a cell tower or monopole or the side or roof of a building. The DAS may be owned by someone other than AT&T Mobility such that AT&T Mobility cannot install backup power. Generally speaking, a DAS is a system of spatially separated antennas connected via cables (i.e., coaxial or fiber optic cable) to a signal source, such as a base station or an external antenna capable of communicating with a base station wireless. DAS are used to distribute wireless signals through large structures such as office buildings and arenas where the signal coverage from the “traditional” cell sites is lacking, to increase the capacity of the wireless system, or to provide service in an area that does not allow a traditional cell site. AT&T Mobility also believes the term “cell site” excludes repeaters. A repeater is a device used for boosting the cell phone reception to the local area by the usage of a reception antenna, a signal amplifier and an internal rebroadcast antenna and is usually intended for use in one building.

- AT&T Mobility contacted federally recognized tribal governments across the state regarding the availability of its Lifeline Service.

In the first half of 2014 AT&T Mobility visited a number of Tribes and Tribal events to distribute Lifeline packets. For example, AT&T participated in the Affiliated Tribes of the Northwest Indians (ATNI) conference where it spoke generally about Lifeline and distributed Lifeline packets. AT&T Mobility also delivered Lifeline packets to offices of the Tulalip, Stillaguamish, Samish, Muckleshoot and Puyallup Tribes. In addition, AT&T Mobility gave Lifeline brochures to The Chief Seattle Club, an organization for homeless Native Americans based in Pioneer Square in Seattle.

## **II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080**

**Confidential Exhibit J** contains AT&T Mobility's projected receipt of federal high cost support in 2015 under the current federal rules, including the reduction in federal high cost support for competitive ETCs ("CETCs").<sup>4</sup> The exhibit also contains AT&T Mobility's plan to utilize the federal high cost support it receives for the period of January 1, 2015 through December 30, 2015.<sup>5</sup>

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 2015. If the federal high cost support that AT&T Mobility receives is more than it currently anticipates, AT&T Mobility will endeavor to spend that additional support in 2015. AT&T Mobility further notes that there may be factors outside of its control that cause a delay to a project listed in the plan for 2015, such as zoning/permitting issues, lease negotiations, back-order of equipment and so forth. Unfortunately, these delays may cause a project to be moved to a subsequent calendar year for completion.

**Confidential Exhibit K** is a map depicting the coverage and cell sites added in 2013 and projected cell site locations for 2014.

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<sup>4</sup> As Mobility Fund Phase II was not implemented by June 30, 2014, the further reduction to forty (40) percent of baseline support has not been implemented. 47 CFR 54.307(e). The AT&T Mobility plan assumes that this further reduction in high-cost support will occur by 2015.

<sup>5</sup> As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported its expected receipt and use of ETC funds for calendar year 2015.

**Exhibit A**  
**Certification**

## Exhibit A

### AT&T MOBILITY LLC ANNUAL CERTIFICATION July 2014

I, Michael C. Maxwell, being of lawful age and duly sworn, state that I serve as Vice President and General Manager for the Pacific Northwest market for AT&T Mobility LLC, and its subsidiaries (collectively, "AT&T Mobility").

I hereby certify to the Washington Utilities and Transportation Commission ("Commission") under penalty of perjury under the laws of the State of Washington as follows:

1. The Commission designated AT&T Mobility as an eligible telecommunications carrier ("ETC") in certain areas in Washington by Order dated April 29, 2005 in Docket UT-043011<sup>1</sup> which was expanded by Order 03 dated October 15, 2009 in the same docket;<sup>2</sup>
2. Federal universal service support received by AT&T Mobility was used in 2013 and will be used in 2015 only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended in accordance with WAC 480-123-060;
3. During calendar year 2013, AT&T Mobility provided the supported services required by 47 U.S.C. § 214(e) and has provided detailed information on the use of funds in accordance with WAC 480-123-070;
4. During calendar year 2013, AT&T Mobility met the applicable service quality standards by complying substantially with the CTIA Consumer Code for Wireless Service as required by WAC 480-123-070(5);
5. During calendar year 2013, AT&T Mobility had the ability to function in an emergency and met the applicable requirements as modified by the Commission in Docket UT-063060, Orders 01 - 04 regarding the installation of backup power at its cell sites<sup>3</sup> and as

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<sup>1</sup> See In the Matter of the Petition of Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; New Cingular Wireless PCS, LLC; and Olympia Cellular Telephone Company, Inc., d/b/a Cingular Wireless, LLC for Designation as an Eligible Telecommunications Carrier, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, Order No. 02 (April 29, 2005).

<sup>2</sup> See In the Matter of the Petition of New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company; and Olympia Cellular Telephone Company Inc. d/b/a AT&T Mobility for Amendment of its Designation as an Eligible Telecommunications Carrier to Include Additional Wire Centers, Order Granting Amendment of Designation as an Eligible Telecommunications Carrier to Include Wire Centers in Washington Rural Service Area 2 and 3, Docket UT-04-3011, Order 03 (October 15, 2009). On May 31, 2012, AT&T Mobility notified the Commission that there had been some legal entity changes concerning AT&T Mobility's ETC designation in Washington.

<sup>3</sup> Cell site" is not defined in the Commission's regulations. AT&T Mobility interprets the term "cell site" as excluding distributed antenna systems ("DAS") or similar systems such as in-building small cells, which generally have a different character and use than a "traditional" cell site which has antennas mounted on a cell tower or



further described in the *AT&T Mobility Annual ETC Report for 2013 and 2015 Annual Plan*; and,

6. During calendar year 2013, AT&T Mobility publicized the availability of its Lifeline Service in a manner reasonably designed to reach those likely to qualify for service in accordance with WAC 480-123-070(7).

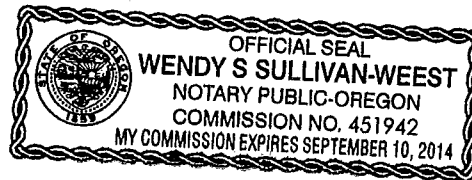
I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.



Michael C. Maxwell  
Vice President/General Manager  
Pacific Northwest Market  
July 23, 2014

Subscribed and sworn to before me  
this 23<sup>rd</sup> day of July, 2014

  
Notary Public



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monopole or the side or roof of a building. The DAS may be owned by someone other than AT&T Mobility such that AT&T Mobility cannot install backup power. Generally speaking, a DAS is a system of spatially separated antennas connected via cables (i.e., coaxial or fiber optic cable) to a signal source, such as a base station or an external antenna capable of communicating with a base station wireless. DAS are used to distribute wireless signals through large structures such as office buildings and arenas where the signal coverage from the "traditional" cell sites is lacking, to increase the capacity of the wireless system, or to provide service in an area that does not allow a traditional cell site. AT&T Mobility also believes the term "cell site" excludes repeaters. A repeater is a device used for boosting the cell phone reception to the local area by the usage of a reception antenna, a signal amplifier and an internal rebroadcast antenna and is usually intended for use in one building.

**REDACTED**

**Exhibit B**

**AT&T Mobility Use of ETC Support in 2013**

**REDACTED**

**Exhibit B**

**AT&T Mobility Use of ETC Support in 2013**

AT&T Mobility received **REDACTED** in federal high cost support for the calendar year 2013 and utilized that support as outlined below. In addition to the items included in the table below, AT&T Mobility expended additional funds in Washington to improve the coverage, capacity and reliability of its network.

<b>Item</b>	<b>2013 Plan</b>	<b>2013 Spend</b>
<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>
<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>
<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>
<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>
<b>Total Spend</b>		<b>REDACTED</b>

**REDACTED**

**Exhibit C**

**2013 Outage Report**



**REDACTED**

**Exhibit D**

**2013 Service Extension Requests (“SERs”)**

ETC SER UNFULFILLED      REDACTED  
ADDRESS: REDACTED

Customer does not have coverage at residence due to the radio signal being blocked by terrain (valley). As the customer is in an ETC designated area, AT&T Mobility conducted an evaluation to determine whether it could reasonably fulfill the customer’s service request. Customer does not have broadband internet for a metrocell.

Evaluation:

A.) Modify or replace the customer’s equipment.

- This is unlikely a handset issue. The issue occurs at the customer’s primary residential/business address (not during travel). Based on current coverage map, there is no coverage at customer’s location.

B.) Deploy a roof-mounted antenna or other equipment.

- A 3G Microcell is an option to improve in-building performance. Unfortunately, customer does not currently have access to the required broadband connection for the use of a 3G Microcell.

C.) Adjust the nearest cell tower.

- This would not improve coverage for the customer as the nearest cell site is too far away.

D.) Adjust network or customer facilities.

- See response to B and C, above.

E.) Resell service from another carrier’s facilities.

- Not a feasible option.

F.) Determine the feasibility of adding a new site in this area.

- AT&T will keep this request in mind when conducting its long term site planning.

The customer has been notified of the result of this evaluation.

REDACTED

EXHIBIT D – Page 2 of 3

ETC SER UNFULFILLED            REDACTED  
ADDRESS: REDACTED

Customer does not have coverage at residence due to the distance from the nearest cell site. As the customer is in an ETC designated area, AT&T Mobility conducted an evaluation to determine whether it could reasonably fulfill the customer's service request. Customer lives over 10 miles from our nearest site, blocked by terrain and trees. The customer does not have broadband internet for a metrocell.

Evaluation:

A.) Modify or replace the customer's equipment.

- This is unlikely a handset issue. The issue occurs at the customer's primary residential/business address (not during travel). Based on current coverage map, there is no coverage at customer's location.

B.) Deploy a roof-mounted antenna or other equipment.

- A 3G Microcell is an option to improve in-building performance. Unfortunately, customer does not currently have access to the required broadband connection for the use of a 3G Microcell.

C.) Adjust the nearest cell tower.

- This would not improve coverage for the customer as the nearest cell site is too far away.

D.) Adjust network or customer facilities.

- See response to B and C, above.

E.) Resell service from another carrier's facilities.

- Not a feasible option.

F.) Determine the feasibility of adding a new site in this area.

- AT&T will keep this request in mind when conducting its long term site planning.

The customer has been notified of the result of this evaluation.

REDACTED

EXHIBIT D – Page 3 of 3

ETC SER UNFULFILLED            REDACTED  
ADDRESS: REDACTED

Customer does not have coverage at residence due to the distance from the nearest cell site. As the customer is in an ETC designated area, AT&T Mobility conducted an evaluation to determine whether it could reasonably fulfill the customer's service request. Customer lives over 10 miles from our nearest site, blocked by terrain and trees. Customer does not have broadband internet for a metrocell.

Evaluation:

A.) Modify or replace the customer's equipment.

- This is unlikely a handset issue. The issue occurs at the customer's primary residential/business address (not during travel). Based on current coverage map, there is no coverage at customer's location.

B.) Deploy a roof-mounted antenna or other equipment.

- A 3G Microcell is an option to improve in-building performance. Unfortunately, customer does not currently have access to the required broadband connection for the use of a 3G Microcell.

C.) Adjust the nearest cell tower.

- This would not improve coverage for the customer as the nearest cell site is too far away.

D.) Adjust network or customer facilities.

- See response to B and C, above.

E.) Resell service from another carrier's facilities.

- Not a feasible option.

F.) Determine the feasibility of adding a new site in this area.

- AT&T will keep this request in mind when conducting its long term site planning.

The customer has been notified of the result of this evaluation.



**REDACTED**

**Exhibit E**

**Complaints per 1,000 Handsets/Lines**

As required by WAC 480-123-070(4), AT&T Mobility provides the following information on the complaints it received during calendar year 2013. Specifically, **REDACTED** complaints were filed by AT&T Mobility customers in Washington with the FCC or approximately **REDACTED** complaints per 1,000 customers. AT&T Mobility customers in Washington filed **REDACTED** complaints with the office of the attorney general of Washington or **REDACTED** per 1,000 customers.

The following table includes the complaints received and the outcome. For each complaint that AT&T Mobility receives from the FCC or the office of the attorney general, a specialized customer care group within AT&T Mobility attempts to contact the customer to resolve the matter.

<b>WA Complaints Summary</b>			
<b>Root Cause</b>	<b>Satisfied</b>	<b>Unsatisfied/Unable to contact/Undetermined</b>	<b>Grand Total</b>
<b>Billing/Billing Issue/Collections/Fees/Payment</b>			
<b>Equipment/Feature</b>	<b>REDACTED</b>		
<b>Misc</b>			
<b>Network</b>			
<b>Point of Sale</b>			
<b>Policy</b>			
<b>Grand Total</b>			

**Exhibit F**

**AT&T Mobility Lifeline Brochure**

Washington

# lifeline service



Discounted service for qualified customers



## Lifeline

Lifeline offers you a discount on your monthly wireless bill, if you qualify.

### Save Money With Lifeline

Lifeline service is just \$24.99 a month, which is then discounted by \$9.25 to reduce your monthly charge to \$15.74.

If you live on Tribal Lands and qualify, you could get Enhanced Lifeline support, which can reduce your wireless bill to as little as \$1.

### Qualifying for Lifeline

Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Only one Lifeline service is available per household; A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; A household is not permitted to receive Lifeline benefits from multiple providers; Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's (or "FCC") rules and will result in the subscriber's de-enrollment from the program; and Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person. You may qualify for federal Lifeline benefits if your household income is at or below 135% of the Federal Poverty Guidelines (FPG), or you participate in any of these programs:

- Medicaid (not Medicare)
- Supplemental Nutrition Assistance Program (SNAP or Food Stamps)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) (Section 8)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)

Customers seeking to qualify for program benefits under the income-based standards are required to provide written documentation of their household income.

If you live on Tribal Lands, you could also qualify for Enhanced Lifeline support if you meet the above requirements or participate in any of these programs:

- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Administered Temporary Assistance for Needy Families (Tribal TANF)
- Tribal Administered Head Start (meeting income qualifying standards)
- Food Distribution Program on Indian Reservations (FDPIR)

**Please note:** You are responsible for notifying AT&T when you no longer meet the applicable eligibility requirements for the Program within (30) days of becoming aware of such ineligibility.

### Program Restrictions

Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household.

Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Federal Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1. current or prior year's statement of benefits from a qualifying state, federal or Tribal program. 2. a notice letter of participation in a qualifying state, federal or Tribal program. 3. program participation documents (e.g.: consumers SNAP card, Medicaid card, or copy thereof). 4. other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment/Workmen's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. AT&T Mobility will NOT retain a copy of this documentation.

### Signing Up

Just complete the Lifeline Application form and certify that you participate in a qualifying government program or otherwise meet the eligibility standards. Mail the completed application and documentation to:

**AT&T**  
**ATTN: Contract Services**  
**PO Box 2377**  
**Jacksonville, Texas 75766**

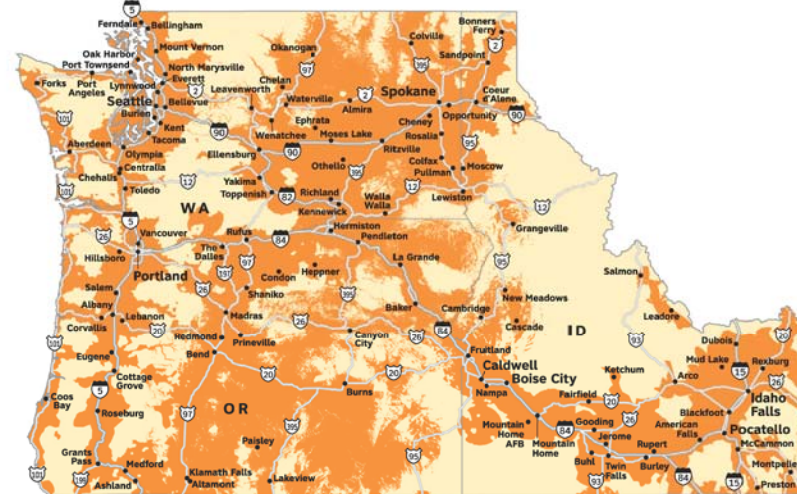
If you cannot access the application form from <http://www.att.com/mobility-lifeline>, just call **1-800-377-9450** and an application will be mailed to you.

Applications that are not completely filled out, legible and signed will be returned.



## Lifeline service for only \$15<sup>74</sup> per month

300 Anytime Minutes / 1000 Night & Weekend Minutes\* and Nationwide Long Distance Included



AT&T Coverage Area

If you still have questions or would like to receive information by mail, please call a Lifeline Customer Service Representative at **1-800-377-9450**, Monday through Friday between the hours of 10:00 a.m. - 7:00 p.m. CST.

### AT&T GSM handset required on Lifeline plans.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included or excluded in your plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from the graphics shown in the map, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber. Future coverage, if depicted above, is based on current planning assumption but is subject to change and has not yet been confirmed.

\*The night and weekend periods are from 9:00 p.m. to 6:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The anytime minutes used in long distance calls to the United States will be discounted from the plan. Originating international long distance calls will not be allowed. The roaming cost is \$0.25 per minute and anytime minutes used will be discounted from minutes included in the plan. International roaming is not available. No rollover can be made. The anytime minutes used in excess of the ones included in the plan will be charged at \$0.15 per minute. These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations. To determine if Lifeline is available from AT&T Mobility at your principal residence, please contact a Lifeline Customer Service Representative at 1-800-377-9450.

**Terms and Conditions:** Lifeline Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline Contract. © 2013 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. Revised 03/2013.



Washington

servicio  
lifeline



Servicio con subsidio para clientes  
que reúnan los requisitos



RTP BR T 0313 5925 D-6a/r  
WAS

## Lifeline

Lifeline ofrece un descuento en la factura mensual de servicio móvil, para quienes cumplen con los requisitos.

### Ahorra dinero con Lifeline

El servicio telefónico Lifeline cuesta sólo \$24.99 al mes, a lo que luego se le descuentan \$9.25 para reducir el cargo mensual a \$15.74.

Si vives en territorios tribales y cumples con los requisitos, podrías recibir la asistencia de Enhanced Lifeline para reducir el total de la factura de servicio móvil y pagar hasta un mínimo de \$1.

### Requisitos para Lifeline

Lifeline es un beneficio federal y realizar declaraciones falsas voluntariamente para obtenerlo puede resultar en multas, prisión, cancelación de la inscripción o prohibición para volver a inscribirse en el programa. Sólo se ofrece un servicio de Lifeline por grupo familiar. Por "grupo familiar" se entenderá, a los efectos del programa Lifeline, cualquier persona o grupo de personas que vivan juntas en una misma dirección y compartan ingresos y gastos. Un solo grupo familiar no podrá recibir beneficios Lifeline de varios proveedores. La violación de este límite constituye un incumplimiento del reglamento de la Comisión Federal de Comunicaciones (FCC) y se cancelará la inscripción del suscriptor en el programa. Lifeline es un beneficio no transferible y el suscriptor no podrá transferirlo a ninguna otra persona. Es posible que tengas derecho a recibir los beneficios federales de Lifeline si los ingresos de tu grupo familiar son iguales o inferiores a un 135% de las normas federales de pobreza (FPG, por su sigla en inglés), o si participas en uno de estos programas:

- Asistencia médica Medicaid (no Medicare)
- Programa complementario de asistencia nutricional (Supplemental Nutrition Assistance Program, SNAP, o cupones de alimentos)
- Ingresos complementarios de seguridad (Supplemental Security Income o SSI)
- Asistencia federal para vivienda pública (Federal Public Housing Assistance o FPHA), Sección 8
- Programa de asistencia a hogares de bajos ingresos para gastos de energía (Low Income Home Energy Assistance Program o LIHEAP)
- Programa nacional de almuerzos escolares (National School Lunch Program o NSLP)
- Asistencia temporal a familias necesitadas (Temporary Assistance for Needy Families o TANF)

Los clientes que buscan cumplir con los requisitos para obtener los beneficios del programa bajo las normas basadas en los ingresos deben proporcionar documentación escrita sobre los ingresos de su grupo familiar.

Si vives en territorios tribales, también podrías recibir los beneficios de Enhanced Lifeline si cumples con los requisitos anteriores o participas en uno de estos programas:

- Asistencia general de la Oficina para asuntos indígenas (Bureau of Indian Affairs o BIA)
- Asistencia Temporal a familias necesitadas administrada a nivel tribal (Tribal Administered Temporary Assistance for Needy Families o Tribal TANF)
- Head Start administrado a nivel tribal (con cumplimiento de los requisitos sobre ingresos)

• Programa de distribución de alimentos en reservas indígenas (Food Distribution Program on Indian Reservations o FDIPIR)

**Importante:** el cliente es responsable de notificar a AT&T cuando ya no cumpla con los requisitos correspondientes para recibir los beneficios del programa dentro de los treinta (30) días posteriores a tener conocimiento de tal inhabilitación.

### Restricciones del programa

Lifeline es un programa de ayuda gubernamental. El servicio no es transferible. Sólo los clientes que cumplan con los requisitos podrán inscribirse en el programa. Existe un límite de un descuento por grupo familiar.

Formularios de documentación requerida para inscribirse: todos los suscriptores deberán demostrar que cumplen con los requisitos basándose por lo menos en (1) que los ingresos del grupo familiar (según la cantidad de integrantes) son iguales o inferiores a un 135% de las normas federales de pobreza; O (2) que el grupo familiar participa en uno de los programas de asistencia federal.

1. Declaración actual o del año anterior de los beneficios que recibe de un programa calificado estatal, federal o tribal. 2. Una carta que certifique la participación en un programa calificado estatal, federal o tribal. 3. Documentos que prueben la participación en un programa (por ej. tarjeta SNAP del consumidor, tarjeta Medicaid, o copias de las mismas). 4. Otros documentos oficiales que certifiquen que el cliente participa en un programa calificado estatal, federal o tribal. Requisitos de ingresos: declaración de renta estatal, federal o tribal del año previo, declaración de ingresos actual de un empleador o un talón de pago. Un estado de cuenta de los beneficios del seguro social. Un estado de cuenta de los beneficios de la Administración de Veteranos de Guerra. Un estado de cuenta de los beneficios de jubilación o de pensión. Un estado de cuenta de los beneficios de desempleo o de indemnización por accidentes de trabajo. Una carta federal o tribal que certifique la participación en el programa Asistencia general (General Assistance). Sentencia de divorcio, sentencia de manutención de los hijos u otro documento oficial con información sobre los ingresos de al menos los últimos tres (3) meses. AT&T Mobility NO se quedará con una copia de estos documentos.

### Para inscribirse

Completa el formulario de solicitud de Lifeline, y certifica que participas en uno de los programas gubernamentales seleccionados o que cumples con los requisitos necesarios. Envía la solicitud completa y la documentación a:

AT&T  
ATTN: Contract Services  
PO Box 2377  
Jacksonville, Texas 75766

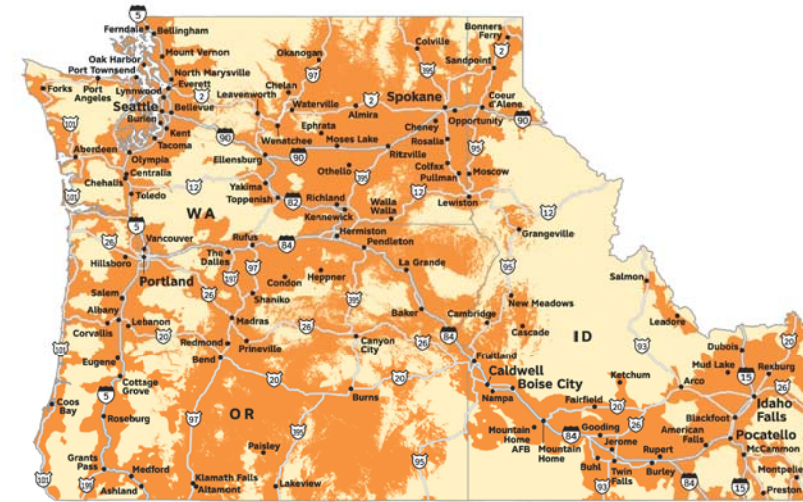
Si no puedes tener acceso al formulario de solicitud desde <http://www.att.com/mobility-lifeline>, llama al 1-800-377-9450 y te enviaremos una solicitud por correo.

Se devolverán las solicitudes que no se reciban completas, sean ilegibles o no estén firmadas.



## Servicio Lifeline por sólo \$15<sup>74</sup> al mes

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana\*, y larga distancia a nivel nacional



Área de cobertura de AT&T

En caso de tener preguntas o si deseas recibir información por correo, comunícate con un representante del servicio al cliente de Lifeline al 1-800-377-9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

Para los planes Lifeline se requiere un teléfono GSM de AT&T.

La información que aparece en la pantalla del teléfono no indica la tarifa que se cobrará. Es importante revisar el mapa de cobertura para ver las áreas que se incluyen en el plan. El mapa muestra una aproximación de la cobertura al aire libre. El mapa puede incluir áreas en las que otras empresas no afiliadas ofrecen sus servicios y es posible que represente el área para la cual se cuenta con licencia en lugar de una aproximación de cobertura. El área de cobertura real puede variar considerablemente de lo que muestran los gráficos del mapa por motivos del terreno, clima, follaje, edificios y demás construcciones, intensidad de la señal, equipo del cliente y otros factores. AT&T no garantiza la cobertura. Los cargos de penderán del lugar donde se transmite y recibe la llamada, más no del lugar en el que se encuentra el suscriptor. La cobertura futura, en caso de representarse arriba, se basa en suposiciones actuales de planificación, aunque se encuentra sujeta a cambio y aún no se ha confirmado.

\*Los periodos de noche y de fin de semana son de 9:00 p.m. a 6:00 a.m. de lunes a viernes, y todo el día los sábados y domingos. Los minutos de uso utilizados en las llamadas de larga distancia a los Estados Unidos se descontarán del plan. No está permitido efectuar llamadas de larga distancia internacional. El costo de roaming es de \$0.25 por minuto y los minutos de uso se descontarán de los minutos incluidos en el plan. No se ofrece servicio de roaming internacional. No se pueden traspasar los minutos de mes a mes. Los minutos de uso que excedan la cantidad asignada en el plan se cobrarán a \$0.15 por minuto. Estos programas gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos requisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece el servicio de Lifeline en el lugar de residencia principal del suscriptor, favor de comunicarse con un representante del servicio al cliente de Lifeline al 1-800-377-9450.

**Términos y condiciones:** el servicio de Lifeline está sujeto a los términos y condiciones que aparecen en los términos de servicio, el plan de tarifas, la información de venta y en el contrato de Lifeline. © 2013 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todas las otras marcas contenidas aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Actualizado: Marzo de 2013.

**Exhibit G**

**AT&T Mobility Lifeline Advertisement**

# Lifeline service from AT&T Mobility.



**FREE**  
while supplies last  
PANTECH BREEZE III™

Qualified low-income residents of Washington may receive discounted service from AT&T under the Lifeline program. Customers must meet certain eligibility criteria based on income level or current participation in financial assistance programs.

Rethink Possible® 

FREE SHIPPING | FOR QUESTIONS OR TO APPLY FOR LIFELINE SERVICE,  
CALL A LIFELINE CUSTOMER SERVICE REPRESENTATIVE AT 1-800-377-9450  
OR VISIT [WWW.ATT.COM/MOBILITY-LIFELINE](http://WWW.ATT.COM/MOBILITY-LIFELINE).

**SERVICE AVAILABLE AT \$15.74** after Lifeline discounts are applied.

Discounts starting at \$9.25 per month.

Includes 300 Anytime minutes, nationwide long distance, and 1,000 night and weekend minutes.

**ADDITIONAL SERVICE PLANS AVAILABLE STARTING AT \$39<sup>99</sup>** plus additional charges  
**MINIMUM RATE PLAN INCLUDES:**

- 450 minutes per month
- 5,000 night & weekend minutes
- No roaming or long distance charges
- Directory assistance available by dialing 4-1-1, \$1.79 per call
- Free mobile to mobile service
- No additional charge to call 9-1-1
- No additional charge to dial "0" for operator assistance to complete a call

**Lifeline is a government assistance program**, the service is nontransferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household consisting of either wireline or wireless service. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) household income at or below 135% of Federal Poverty Level guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1: Current or prior year's statement of benefits from a qualifying state, federal, or Tribal program. 2: A notice letter of participation in a qualifying state, federal, or Tribal program. 3: Program participation documents (e.g., consumer SNAP card, Medicaid card, or copy thereof). 4: Other official document evidencing the consumer's participation in a qualifying state, federal, or Tribal program. Income eligibility: Prior year's state, federal, or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment/Workers' Compensation statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months' time. AT&T Mobility will NOT retain a copy of this documentation. **Billing:** Usage rounded up to the next full minute or kilobyte, at the end of each call or data session, for billing purposes. Screen images simulated. All marks used herein are the property of their respective owners. ©2013 AT&T Intellectual Property.



## Exhibit H

### Lifeline Print Publications and Dates – 2013

<b>Insertion Date</b>	<b>Publication</b>
3/3/2014	Bellingham Herald
3/3/2014	Kitsap Sun
3/3/2014	Longview Daily News
3/3/2014	Olympia Olympian
3/3/2014	Port Townsend Leader
3/3/2014	Seattle Times/Post Intelligencer
3/3/2014	Spokane Spokesman-Review
3/3/2014	Tacoma News Tribune
3/3/2014	The Columbian
3/3/2014	Tri-City Herald
3/3/2014	Whidbey News-Times
3/3/2014	Yakima Herald-Republic
6/2/2014	Bellingham Herald
6/2/2014	Kitsap Sun
6/2/2014	Longview Daily News
6/2/2014	Olympia Olympian
6/2/2014	Port Townsend Leader
6/2/2014	Seattle Times/Post Intelligencer
6/2/2014	Spokane Spokesman-Review
6/2/2014	Tacoma News Tribune
6/2/2014	The Columbian
6/2/2014	Tri-City Herald
6/2/2014	Whidbey News-Times
6/2/2014	Yakima Herald-Republic
9/1/2014	Bellingham Herald
9/1/2014	Kitsap Sun
9/1/2014	Longview Daily News
9/1/2014	Olympia Olympian
9/1/2014	Port Townsend Leader
9/1/2014	Seattle Times/Post Intelligencer
9/1/2014	Spokane Spokesman-Review
9/1/2014	Tacoma News Tribune
9/1/2014	The Columbian
9/1/2014	Tri-City Herald
9/1/2014	Whidbey News-Times
9/1/2014	Yakima Herald-Republic
11/10/2014	Bellingham Herald

11/10/2014	Kitsap Sun
11/10/2014	Longview Daily News
11/10/2014	Olympia Olympian
11/10/2014	Port Townsend Leader
11/10/2014	Seattle Times/Post Intelligencer
11/10/2014	Spokane Spokesman-Review
11/10/2014	Tacoma News Tribune
11/10/2014	The Columbian
11/10/2014	Tri-City Herald
11/10/2014	Whidbey News-Times
11/10/2014	Yakima Herald-Republic



**Exhibit I**

**AT&T Mobility Lifeline Direct Mail Postcard**



Front for all state versions

# AT&T Mobility Lifeline Service\*

*Representantes bilingües disponibles. Llama ahora al **1-800-377-9450** para hablar con un representante bilingüe del servicio al Cliente de Lifeline.*



\*Lifeline is a government assistance program; the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household consisting of either wireline or wireless service. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

AL4557



# Get a phone with affordable service.

National  
(AL, AR, LA, VA, MS, WA)



PO Box 91166  
Seattle, WA 98111-9266



## AT&T Mobility Lifeline Service

\$15.74 per month after discount of \$9.25. The plan includes 300 Anytime Minutes and 1,000 Night and Weekend Minutes, including Nationwide Long Distance.

Qualified low-income residents may receive discounted wireless service from AT&T Mobility under the Lifeline program. Lifeline is a government assistance program; the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. Customers must meet certain eligibility criteria based on income level or current participation in financial assistance programs.

Call today to find out which phones are available at a discount with AT&T Mobility Lifeline Service.

✓ For more information call  
**1-800-377-9450** or visit  
**att.com/mobility-lifeline**

<Elizabeth Fitzgerald>  
<Suite 2100>  
<1215 4th Ave.>  
<Seattle, WA 98161-1018>



Printed on recycled paper. Please recycle. ♻️

**Limited time offer:** Available while supplies last. Regarding equipment offered substitutions may apply. For specific information regarding the terms and conditions of the rate plan, please refer to the Lifeline rate plan brochure and Lifeline service applications at <http://att.com/mobility-lifeline>. "Roaming" and other charges may apply. Clients and applicants of the Lifeline service must meet certain criteria based on their income and/or their current participation in certain programs of economic assistance. Certain restrictions apply. **Forms of documentation necessary for enrollment:** All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1 - current or prior year's statement of benefits from a qualifying state, federal or Tribal program. 2 - a notice letter of participation in a qualifying state, federal or Tribal program. 3 - program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). 4 - other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment/Workmen's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. AT&T Mobility will NOT retain a copy of this documentation. ©2013 AT&T Intellectual Property. All rights reserved. AT&T and the AT&T logo are trademarks of AT&T Intellectual Property. All other marks contained herein are the property of their respective owners.

AL4557-T1A

**REDACTED**

**Exhibit J**

**Annual Plan for Universal Service Support Expenditures for January 1, 2015  
through December 31, 2015<sup>6</sup>**

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<sup>6</sup> AT&T Mobility understands that the Washington rule only requires it to provide planned expenditure information through September 30, 2013; however, AT&T Mobility's plans are on a calendar year basis.

**REDACTED**

**Exhibit J**

**Annual Plan for Universal Service Support Expenditures for January 1, 2015  
through December 31, 2015**

AT&T Mobility's projected receipt of federal high cost support in 2015 is **REDACTED** for its entire ETC designated area in Washington. This amount includes the reduction in federal high cost support for CETCs.<sup>1</sup>

<b>Item</b>	<b>2015 Plan</b>	<b>2015 Amount</b>
<b>REDACTED</b>	<b>REDACTED</b>	<b>REDACTED</b>
<b>Total Plan</b>		<b>REDACTED</b>

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<sup>1</sup> As Mobility Fund Phase II was not implemented by June 30, 2014, the further reduction to forty (40) percent of baseline support has not been implemented. 47 CFR 54.307(e). The AT&T Mobility plan assumes that this further reduction in high-cost support will occur by 2015.

**REDACTED**

**Exhibit K**

**Map**

**Cell sites as of End of Year 2013, Projected End of Year 2014 and Projected End of Year 2015**

**THE ENTIRE MAP IS REDACTED**