

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	Docket No. _____
T-Mobile West LLC For Conversion	)	
of Its High-Cost Eligible	)	T-MOBILE WEST LLC’S PETITION FOR
Telecommunications Carrier Designation	)	CONVERSION OF ITS HIGH-COST
and for Relinquishment of Its Mobility	)	ELIGIBLE TELECOMMUNICATIONS
Fund I Eligible Telecommunications	)	CARRIER DESIGNATION AND FOR
Carrier Designation Pursuant to 47	)	RELINQUISHMENT OF ITS MOBILITY
U.S.C. § 214(e)(4)	)	FUND I ELIGIBLE
	)	TELECOMMUNICATIONS CARRIER
	)	DESIGNATION PURSUANT TO 47 U.S.C. §
	)	214(E)(4)

**T-MOBILE WEST LLC’S PETITION FOR CONVERSION OF  
ITS HIGH-COST ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION  
AND FOR RELINQUISHMENT OF ITS MOBILITY FUND I ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION  
PURSUANT TO 47 U.S.C. § 214(e)(4)**

T-Mobile West LLC (hereinafter, “T-Mobile” or the “Company”) hereby submits this petition for conversion of its high-cost eligible telecommunications carrier (“ETC”) designation to a Lifeline-only ETC designation and for relinquishment of its Mobility Fund I (“MF I”) ETC designation in the State of Washington, effective December 31, 2020. This petition is made pursuant to 47 U.S.C. § 214(e)(4), 47 C.F.R. § 54.205 and Washington Administrative Code (“WAC”) 860-07-370(3). As explained herein, this conversion and relinquishment of T-Mobile's high-cost and MF I ETC designations, respectively, meets all applicable requirements and should be expeditiously granted.

## I. COMMUNICATIONS REGARDING THIS APPLICATION

All correspondence and communications regarding this Application should be addressed as follows:

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## II. BACKGROUND

On October 14, 2010, the Commission issued Order No. 01 in Docket UT-101060 (“*High-Cost Designation Order*”), designating T-Mobile as an ETC for purposes of receiving federal high-cost support and low income (Lifeline) universal service support. The Universal Service Administrative Company (“USAC”) has assigned study area code (“SAC”) 529013 to T-Mobile to represent its High-Cost ETC Service Area in Washington.

On June 14, 2012, the Commission issued Order No. 01 in Docket UT-120512 (“*MF I Designation Order*”), granting T-Mobile conditional designation as an ETC for purposes of participating in the Mobility Fund Phase I auction. Pursuant to Ordering Paragraph (1) of the *MF I Designation Order*, T-Mobile filed with the Commission a notification specifying the names of the census blocks and census tracts where, pursuant to the auction results, it was

eligible to receive MF I support,<sup>1</sup> as well as the names of associated incumbent local exchange carriers' wire centers corresponding to the census blocks and census tracts. USAC assigned SACs 528001, 528002 and 528003 to T-Mobile to represent its MF I ETC Service Area in Washington.

### **III. T-MOBILE'S REQUEST FOR CONVERSION AND RELINQUISHMENT OF ITS ETC DESIGNATIONS**

As an ETC in Washington, T-Mobile has utilized high-cost universal service support (including MF I) to expand its coverage and improve its network, and has made Lifeline discounted services available to eligible consumers. This build out of T-Mobile's network, supported by MF I, also spurred additional competition in these census blocks. However, T-Mobile has determined it will seek to convert its high-cost ETC designation to Lifeline-only and relinquish its MF I ETC designation in Washington, effective December 31, 2020. T-Mobile has made this determination based on a number of considerations, including: (1) expiration of its MF I-related funding and obligations in Washington; (2) the new 5G high-cost support requirements adopted by the Federal Communications Commission ("FCC") in its recently issued *5G Rural Fund Order*;<sup>2</sup> and (3) its business plans and requirements. T-Mobile has already met the MF I deployment obligations and will continue to meet the remaining obligations, such as the requirement to retain MF I-related documents for ten years after the date of its final MF I support disbursement.<sup>3</sup>

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<sup>1</sup> *Mobility Fund Phase I Auction Closes, Winning Bidders Announced for Auction 901*, Public Notice, 27 FCC Rcd 12031, DA 12-1566 (WTB 2012); *Mobility Fund Phase I Support Authorized for 42 Winning Bids*, Public Notice, 28 FCC Rcd 9001, 9003, Attachment A, DA 13-1429 (WTB 2013).

<sup>2</sup> *Establishing a 5G Fund for Rural America*, Report and Order, GN Docket No. 20-31, FCC 20-150, 2020 WL 6381425 (rel. Oct. 29, 2020).

<sup>3</sup> 47 C.F.R. § 54.1010.

Though T-Mobile will no longer receive federal high-cost universal service support in Washington after the effective date of the conversion of its high-cost ETC designation to a Lifeline-only ETC designation, it will continue to provide wireless service to consumers in Washington and will continue as a Lifeline-only ETC. Thus, going forward, existing and future subscribers of T-Mobile in the state will be able to enjoy T-Mobile’s high quality wireless service offerings and existing and future qualified customers will receive Lifeline service from T-Mobile in its Lifeline-only ETC designated service area. T-Mobile plans to continue to expand its coverage and improve its network in Washington, including a significant expansion of its 5G network in both urban and rural areas in the state. T-Mobile’s plan is to invest nearly \$40 billion over the next three years to bring the company and its nationwide wireless network into the 5G era. And, it has committed to bring 5G coverage to at least 85% of the U.S. rural population by 2023 and at least 90% of the U.S. rural population by 2026.<sup>4</sup>

There are a number of other ETCs that provide Lifeline service throughout T-Mobile’s MF I ETC Service Area, including incumbent local exchange carriers (“ILECs”). Additionally, T-Mobile’s affiliate, Assurance Wireless, is a Lifeline provider in the state under its own ETC designation. T-Mobile will also continue to offer a variety of low-cost service plans to consumers in Washington, including T-Mobile Connect, Project 10 Million, and Connecting Heroes. The T-Mobile Connect plans include (1) unlimited voice and text and 2 GB of data for \$15.00 per month, or (2) unlimited voice and text and 5 GB of data for \$25.00;<sup>5</sup> Project 10 Million represents a \$10 billion investment that offers school districts free internet access of 100

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<sup>4</sup> *Applications of T-Mobile, US, Inc., and Sprint Corporation, For Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, Declaratory Ruling, and Order of Proposed Modification, 34 FCC Rcd 10578, FCC 19-103 (2019).

<sup>5</sup> Press Release, T-Mobile, *T-Mobile Launches Early to Help the Most Vulnerable in America Get and Stay Connected* (Mar. 23, 2020), <https://www.t-mobile.com/news/offers/tmobile-connect-launch>.

GB of data per year and mobile hotspots for 10 million eligible households;<sup>6</sup> and Connecting Heroes represents a \$7 billion investment over ten years that will provide first responder agencies with free unlimited talk, text and data.<sup>7</sup>

**A. T-Mobile's Conversion and Relinquishment of its ETC Designation Complies With Federal Law**

The Commission "shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier;"<sup>8</sup> 47 U.S.C. section 214(e)(4) states in relevant part:

(4) Relinquishment of universal service

A State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall establish a time, not to exceed one year after the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

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<sup>6</sup> Project 10 Million Launch Page, T-MOBILE.COM, <https://www.t-mobile.com/business/education/project-10-million>.

<sup>7</sup> Press Release, T-Mobile, *T-Mobile Launches 'Connecting Heroes' – Free 5G for First Responder Agencies Is Here* (May 21, 2020), <https://www.t-mobile.com/news/un-carrier/connecting-heroes>.

<sup>8</sup> 47 U.S.C. § 214(e)(4).

The requirements for relinquishing ETC designation are: (1) there must be more than one ETC serving in the area of the ETC seeking relinquishment; (2) the ETC seeking relinquishment must provide advance notice to the relevant state commission; (3) the customers served by the relinquishing ETC must continue to be served by an ETC; and (4) to the extent that additional facilities are required to serve any of the relinquishing ETC's customers, sufficient notice shall be provided to ensure that the construction or purchase can be timely completed.

T-Mobile's application for conversion and relinquishment of its ETC designations complies with federal law and must be granted because: (1) T-Mobile will continue to provide Lifeline service in its current high-cost ETC Service Area under its Lifeline-only ETC designation after converting its high-cost ETC designation; (2) there is currently more than one ETC serving the MF I ETC Service Area; (3) T-Mobile is providing advance notice to the Commission of such relinquishment; (4) T-Mobile will continue providing service to its customers, and additionally, the remaining ETCs in the market should be able to serve the universal service needs of consumers within their respective designated service areas, which cover the high-cost ETC Service Area and MF I ETC Service Area; and (5) no additional facilities will need to be purchased or constructed by the remaining ETCs.

#### **1. T-Mobile Will Continue to Serve the High-Cost ETC Service Area**

After conversion of its high-cost ETC designation, T-Mobile will continue to provide wireless service and Lifeline service throughout its converted ETC Service Area under a Lifeline-only designation. T-Mobile will serve the same local exchange carrier wire centers. These same wire centers currently in T-Mobile's High-Cost ETC Service Area are also served by the incumbent local exchange carriers in their respective service areas. Therefore, even after

conversion of its high-cost ETC designation, T-Mobile, as well as at least one other ETC, will serve the converted ETC Service Area as required by 47 U.S.C. § 214(e).

**2. There Is More Than One ETC Currently Serving the MF I ETC Service Area**

T-Mobile's MF I ETC Service Area is also currently served by more than one ETC as required by 47 U.S.C. § 214(e). Therefore, T-Mobile is permitted to relinquish its MF I ETC designation throughout its MF I ETC Service Area.

**3. T-Mobile Is Providing Advance Notice to the Commission**

Consistent with 47 U.S.C. § 214(e), T-Mobile is filing this petition in advance of its requested effective date of relinquishment of federal high-cost universal service support, meeting the requirement to provide advance notice to the Commission of its intent to relinquish such support.

**4. Both T-Mobile and the Remaining ETCs Will Serve Consumers Within the ETC Service Area**

T-Mobile is designated as a high cost ETC in the ILEC wire centers in its ETC service area. As T-Mobile has indicated above, T-Mobile will continue to serve both Lifeline customers and non-Lifeline customers throughout the converted ETC Service Area. T-Mobile will also continue providing uninterrupted service to its traditional wireless customers upon the effective date of its relinquishment of its MF I ETC designation. To the best of T-Mobile's knowledge, the ILECs will also continue to serve customers in the High-Cost and MF I ETC Service Areas, respectively. Individually, and collectively, consumers within both the High-Cost ETC Service Area and the MF I ETC Service Area will continue to be served consistent with 47 U.S.C. § 214(e).

T-Mobile has one impacted Lifeline customer in its MF I ETC Service Area. Following relinquishment of its MF I ETC designation, effective December 31, 2020, in accordance with 47 U.S.C. § 214(e)(4) and consistent with this Commission's past practice,<sup>9</sup> T-Mobile will provide written notice to the customer that T-Mobile no longer participates in the Lifeline program in that part of the State of Washington. The notice will inform this customer that they will continue receiving service and will receive courtesy credits in the amount of their Lifeline discount for 60 days. The notice will indicate that, after 60 days, this customer may continue to receive service under their selected calling plan without the Lifeline discount, they may select an alternative calling plan from T-Mobile at specified rates, or they may obtain discounted Lifeline service from another provider that can be identified by contacting USAC or the Commission. If that one former T-Mobile Lifeline customer decides to obtain service from another provider, T-Mobile will not impose any non-recurring fees on the customer to transition their service.

**5. No Additional Facilities Will Need to Be Purchased or Constructed by the Remaining Eligible Telecommunications Carriers**

To the best of T-Mobile's knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within either the High-Cost ETC Service Area or the MF I ETC Service Area. Because the ILECs collectively currently serve the entire area in which T-Mobile is designated as both a high-cost and an MF I ETC in Washington, the Commission need not provide notice to these carriers to permit them to purchase or construct facilities to ensure that T-Mobile's customers will continue to receive service.

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<sup>9</sup> *Petition of RCC Minnesota, Inc., For Designation as an Eligible Telecommunications Carrier*, Order Granting Petition for Relinquishment of Eligible Telecommunications Carrier Designation, Docket UT-023033, Order 05, 2009 WL 1384075 (Wash. UTC 2009).



#### IV. CONCLUSION

Through this application, T-Mobile has complied with all requirements of 47 U.S.C. § 214(e). T-Mobile has demonstrated that it meets the requirements for relinquishment. There is no barrier to prevent T-Mobile from converting its high-cost ETC designation and relinquishing its MF I ETC designation in Washington. Consistent with all applicable requirements, therefore, T-Mobile respectfully requests the Commission expeditiously approve T-Mobile's application for conversion and relinquishment of, respectively, its high-cost and Mobility Fund I ETC designations, effective December 31, 2020.<sup>10</sup>

Dated this 21st day of December 2020.

Respectfully submitted,

T-Mobile West LLC

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<sup>10</sup> Because T-Mobile will not be seeking certification as an ETC for the purposes of receiving federal high-cost universal service support going forward, including for the 2021 calendar year, T-Mobile will not be filing further annual ETC Certification Requirements reports for federal high-cost support with the Commission, including the annual ETC Certification Requirements report due on July 1, 2021.