

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Report of)
T-Mobile West LLC as an)
Eligible Telecommunications Carrier) Docket No. _____

**T-MOBILE WEST LLC'S
ANNUAL REPORT AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

T-Mobile West LLC (hereinafter, “T-Mobile” or the “Company”) hereby submits this annual report as an eligible telecommunications carrier (“ETC”) pursuant to the Washington Utilities and Transportation Commission (“Commission”) Orders No. 01, 02 and 03 in Docket UT-101060 (“*Designating Order*”),¹ amended Sections 480-123-060 through 480-123-080 of Washington Administrative Code (“WAC”) (hereinafter referred to as the “*Washington Certification Requirements*”),² and applicable federal requirements, including 47 U.S.C. § 254(e), 47 C.F.R. §§ 54.313, 54.314, and 54.422.

On December 21, 2020, T-Mobile filed with the Commission a Petition for Conversion of its High-Cost ETC Designation and for Relinquishment of its Mobility Fund I ETC Designation Pursuant to 47 U.S.C. § 214(e)(4) (“Lifeline-Only Petition”). On January 28, 2021, the Commission granted T-Mobile’s Lifeline-Only Petition, effective December 31, 2020.³ Accordingly, T-Mobile received its final federal high-cost support for the State of Washington in 2020 and will receive no high-cost support for 2021, or thereafter. Accordingly, this Report

¹ On May 30, 2012, T-Mobile restructured the operating entity that the Commission designated as an ETC in the *Designating Order* and notified the Commission of this change, which the Commission approved in Order Number 03 in Docket UT-101060 effective June 14, 2012.

² On March 26, 2015, the Commission issued General Order R-580, Order Amending, Adopting, and Repealing Rules Permanently, Docket UT-140680 (“*ETC Modified Requirements Order*”).

³ Order No. 01 in Docket UT-201000.

represents T-Mobile's final annual report pursuant to the *Designating Order*, the *Washington Certification Requirements*, and applicable federal requirements. This Report is *not* a petition for certification as T-Mobile will no longer seek, nor receive, high-cost support for 2021 or thereafter.

I. COMMUNICATIONS REGARDING THIS REPORT

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

Mark P. Trincherro
Davis Wright Tremaine LLP
1300 SW 5th Ave, Ste 2400
Portland, Oregon 97201
Telephone: 503-778-5318
marktrincherro@dwt.com

Teri Ohta, Principal Corporate Counsel
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, Washington 98006
Telephone: 425-383-5532
Teri.Ohta@t-mobile.com

II. BACKGROUND

T-Mobile was designated as an ETC for purposes of both high-cost and Lifeline support by the Commission on October 14, 2010 in the *Designating Order*. Pursuant to discussions with Staff of the Commission, on April 5, 2011, T-Mobile filed an amended list of the local exchange carrier wire centers that comprise T-Mobile's designated service area. The Commission accepted T-Mobile's revised ETC service area list of telephone company wire centers and issued Order Number 02 in Docket UT-101060 with the revised list of local exchange carrier wire centers that comprise T-Mobile's designated service area ("Designated Area"), which is included as Attachment A.

On October 27, 2011, in its *USF/ICC Transformation Order*, the FCC adopted changes to its universal service rules.⁴ On February 6, 2012, in its *Lifeline Reform Order*, the FCC adopted

⁴ *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*").

further changes to its universal service rules governing the provision of Lifeline service,⁵ and on March 31, 2016, the FCC adopted further changes to the Lifeline program.⁶ On July 7, 2017, the FCC further streamlined the federal annual reporting requirements for recipients of high-cost universal service support.⁷ Among the changes adopted in the *USF/ICC Transformation Order*, *Lifeline Reform Order*, and *High Cost Annual Report Order*, the FCC revised the annual reporting and certification requirements, which are now reflected in 47 C.F.R. §§ 54.313, 54.314 and 54.422. In this Report, T-Mobile addresses each of the reporting requirements adopted by the Commission in the *Designating Order* and the *Washington Certification Requirements*, and incorporates the identified attachments, some of which contain confidential and proprietary information and are filed under seal. As noted above, T-Mobile converted its high-cost ETC designation in Washington to a Lifeline-only designation effective December 31, 2020⁸ and is no longer required to file FCC Form 481 for high-cost support but continues to file the Form 481 for purposes of Lifeline support in Washington.⁹

III. FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT RECEIVED

In the calendar year 2020, T-Mobile received a total of \$1,328,244 in federal high-cost universal service support for its Designated Area in Washington. Due to the conversion of its

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 (“*Lifeline Reform Order*”).

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carrier Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-41, 09-197, and 10-90, Third Report and Order, Further Report and Order, and Order On Reconsideration, FCC 16-38 (April 27, 2016).

⁷ *In the Matter of Connect America Fund, ETC Annual Reports and Certifications*, Report and Order, FCC 17-87, July 7, 2017 (“*High-Cost Annual Report Order*”).

⁸ Order No. 01 in Docket UT-201000.

⁹ T-Mobile’s FCC Form 481, applicable to Lifeline annual reporting, is filed in Commission docket no. UT-210003 contemporaneous with this Report. T-Mobile is no longer required to file FCC Form 690 for its Mobility Fund service area in Washington because this federal reporting requirement applied for five years after award of support, which was in 2013. See 47 C.F.R. § 54.1006(a).

high-cost ETC designation to a Lifeline-only ETC designation in Washington, T-Mobile will not receive high-cost support for its Designated Area in 2021 or thereafter.

IV. ANNUAL CERTIFICATIONS AND REPORTING

A. Use of Universal Service Support and Benefits to Consumers

Standard 1 of the *Washington Certification Requirements* requires that an ETC submit a report providing a “substantive description of investments made and expenses paid with support from the federal high cost fund,” including “the company’s gross capital expenditures and operating expenses made with federal high-cost support received by the ETC in the preceding calendar year along with a description of major projects and affected exchanges,” plus “a substantive description the benefits to consumers that resulted from the investments and expenses reported.”¹⁰ T-Mobile’s report regarding its use of federal high cost universal service support for 2020 is included as Confidential Attachment B.

The *Washington Certification Requirements*¹¹ and federal law¹² require ETCs to use support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” The FCC rules require states to “file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for

¹⁰ WAC 480-123-070(1).

¹¹ WAC 480-123-060.

¹² 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7.

which the support is intended.”¹³ Included in Attachment C is T-Mobile’s annual certification based upon federal and Washington requirements.¹⁴

B. Local Service Outages

Standard 2 of the *Washington Certification Requirements* requires “detailed information on any outage in the service area (during the prior calendar year) of at least thirty minutes in duration in which the ETC owns, operates, leases, or otherwise utilizes facilities, that potentially affect: (i) At least ten percent of the end users; or (ii) A 911 special facility, as defined in 47 C.F.R. Sect. 4.5(e).”¹⁵ ETCs must include the following information in their outage reports: ¹⁶

- (a) the date and time of onset of the outage;
- (b) a brief description of the outage and its resolution;
- (c) the particular services affected;
- (d) the geographic areas affected by the outage;
- (e) steps taken to prevent a similar situation in the future; and
- (f) the number of customers affected.

T-Mobile’s Outage Report is attached as Confidential Attachment D.

C. Requests for Service

Standard 3 of the *Washington Certification Requirements* requires an ETC to identify the number of requests for service from consumers within its designated service areas that were

¹³ 47 C.F.R. § 54.314(a).

¹⁴ Because, effective December 31, 2020, T-Mobile is now a Lifeline-only provider in Washington and will therefore receive no high-cost support in 2021, the certifications in Attachment C do not address the use of high-cost support for 2021.

¹⁵ WAC 480-123-070(2).

¹⁶ WAC 480-123-070(2).

unfulfilled in the prior calendar year and describe in detail how the Company attempted to provide service to those potential customers.¹⁷ T-Mobile had no unfulfilled service requests in 2020.

D. Complaints Per 1,000 Handsets

Standard 4 of the *Washington Certification Requirements* requires an ETC to report the number of complaints, per 1,000 connections, made to the FCC, or (separately) to the consumer protection division of the Office of the Attorney General of Washington during the previous calendar year.¹⁸ The Washington Certification Requirements also required ETCs to “report the number of consumer complaints in each general category (or example, billing disputes, service quality).”¹⁹ Confidential Attachment E includes the complaints per 1,000 connections consistent with the applicable requirements and the number of consumer complaints in each general category.

E. Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

Standard 5 of the *Washington Certification Requirements* requires an ETC to certify that it met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h), which, for a wireless carrier, is the CTIA-The Wireless Association’s® (“CTIA”) Consumer Code for Wireless Service (“Consumer Code”).²⁰ T-Mobile is a signatory to the Consumer Code and meets applicable service quality and consumer protection rules for wireless carriers. Attachment F includes CTIA’s notification that T-Mobile has completed CTIA’s recertification process for the period January 1, 2020 through December 31, 2021. Attachment J includes T-Mobile’s certification of compliance with applicable service quality standard and consumer protection rules.

¹⁷ WAC 480-123-070(3).

¹⁸ WAC 480-123-070(4).

¹⁹ WAC 480-123-070(4).

²⁰ WAC 480-123-070(5); WAC 480-123-030(1)(h).

F. Certification of Ability to Function in Emergency Situations

Standard 6 of the *Washington Certification Requirements* requires an ETC to annually certify that it is able to function in emergency situations and is in compliance with Washington Administrative Code 480-123-030(1)(g), requiring that, when commercial power is not available, it has a reasonable amount of backup power (fixed, portable or other backup power source) for cell sites required to have backup power.”²¹ 47 C.F.R. § 54.313(a)(1) similarly requires an ETC to certify its ability to function in emergency situations. T-Mobile’s certification of ability to function in emergency situations is included in Attachment J. A copy of T-Mobile’s Emergency Operations Plan is included as Attachment G.

G. Advertising Certification

Standard 7 of the *Washington Certification Requirements* requires an ETC to annually certify that it has publicized the availability of its applicable telephone assistance programs, such as Lifeline Service, in a manner reasonably designed to reach those likely to qualify for service, including to residents of federally recognized Indian reservations within the ETC’s designated service area.²² Attachment J includes T-Mobile’s certification that it appropriately advertised the availability of its telephone assistance program in a manner reasonably designed to reach those likely to qualify for service in accordance with Standard 7 of the *Washington Certification Requirements*. Attachment H includes examples of the advertising that T-Mobile completed in its Designated Area in 2020.

²¹ WAC 480-123-030(1)(g).

²² WAC 480-123-070(7).

H. Annual Plan for Universal Service Support Expenditures

The *Washington Certification Requirements* also require an ETC to report on the planned use of federal support, including the company's planned gross capital expenditures and operating expenses made with federal high-cost support received by the ETC for the coming year along with a description of major projects and affected exchanges, and a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.²³ Due to the relinquishment of its high-cost ETC designation in Washington, T-Mobile will no longer receive high-cost support in Washington in 2021 and thereafter. T-Mobile is therefore not submitting any further updates to its Service Improvement Plan or projecting use of high-cost universal service funds that the Company will no longer receive.

The Washington Certification Requirements also require an ETC to submit, at least every three years, a copy of its then current coverage map in native ESRI format, consistent with WAC 480-123-080(3). T-Mobile submitted a copy of its coverage map in its 2018 Annual Report; because T-Mobile has relinquished its high-cost ETC designation in Washington, T-Mobile is not submitting a copy of its coverage map in this year's filing.

VI. ADDITIONAL T-MOBILE CONDITIONS OF ETC DESIGNATION

The Commission granted T-Mobile's request for ETC designation subject to two conditions. Condition 1(a) of the *Designating Order* requires T-Mobile to comply with all applicable federal and Washington state statutes and regulations, including E911 tax contributions. T-Mobile confirms its compliance with all applicable requirements.

²³ WAC 480-123-080.

Condition 1(b) of the *Designating Order*, related to Lifeline and Link Up support and eligibility, requires T-Mobile to identify the number of Lifeline customers and receipt of federal Lifeline and Link Up support. The Commission also requires T-Mobile to submit a copy of its Annual Verification Survey report made to the USAC regarding its Lifeline customers' continued eligibility for Lifeline, and based upon a review of that information, the Commission reserved the right to impose more rigorous customer eligibility verification requirements on T-Mobile.

A. Low Income Subscribership and Lifeline and Link Up Support

T-Mobile identifies in Confidential Attachment I the total number of Lifeline customers it served in Washington as of December 31, 2020 and the total amount of federal Lifeline and Link Up support received in 2020 for its Washington study area, in compliance with condition 1(b) of the *Designating Order*.

B. Annual Verification Survey

T-Mobile previously provided the Commission with a copy of its Annual Verification Survey filed with USAC on or about January 31, 2020 for its Designated Area in Washington in compliance with condition 1(b) of the *Designating Order*.


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VI. CONCLUSION

Based on the foregoing information, T-Mobile respectfully submits this final Annual Report.

Dated this 30th day of June, 2021.

Respectfully submitted,

By: 

Mark P. Trinchero
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland, Oregon 97201
Telephone: 503-778-5318

Teri Ohta
Principal Corporate Counsel
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, Washington 98006
Telephone: 425-383-5532