



Cindy Manheim · Senior Counsel – Regulatory · phone 425.580.8112 · fax 425.580.8729

August 30, 2005

VIA OVERNIGHT MAIL

Carol J. Washburn, Executive Secretary
 Washington Utilities and Transportation Commission
 1300 S. Evergreen Park Drive S.W.
 Olympia, Washington 98504-7250

**RE: Annual Certification by ETCs Regarding Federal High-Cost Support Pursuant to
 WAC 480-120-399(2)**

Dear Ms. Washburn:

Enclosed for filing, please find the original annual high-cost certification and other information requested by staff of Bellingham Cellular Partnership, Bremerton Cellular Telephone Company, Hood River Telephone Company, New Cingular Wireless PCS, LLC and, Olympia Cellular Telephone Company (collectively, “Cingular Wireless”).

The enclosed certification is submitted pursuant to WAC 480-120-399(2). Cingular Wireless hereby requests that the Washington Utilities and Transportation Commission (“Commission”) file with the Universal Service Fund Administrator and the Federal Communications Commission an annual certification stating that all federal high-cost support provided to Cingular Wireless within the State of Washington will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Cingular has also included information regarding its efforts to publicize the availability of its Lifeline/Linkup programs in the State of Washington. This information is being provided as requested by Commission Staff in its mailing to all Eligible Telecommunications Carriers dated May 13, 2005.

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 COMMISSION

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If you have any questions or concerns about the enclosed certification or information around Cingular Wireless' Lifeline/Linkup efforts, please do not hesitate to contact me directly at 425.580.8112.

Sincerely,



Cindy J. Manheim

Enclosure

cc: Robert Shirley (w/ encl.) (via email and mail) ·
Kimberly Nielsen (w/ encl.)
Beth Fujimoto (w/ encl.)

PRIVATE/PROPRIETARY
Contains Private and/or Proprietary Information
May Not Be Used Or Disclosed Outside Cingular Wireless
Except Pursuant To A Written Agreement

**CINGULAR WIRELESS, LLC ANNUAL CERTIFICATION
PURSUANT TO WAC 480-120-399**

I, Paul Roth, being of lawful age and duly sworn, state that I serve as Executive Vice President, External Affairs and Public Relations for Cingular Wireless, LLC and its subsidiary licensees, Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; New Cingular Wireless PCS, LLC; and Olympic Cellular Telephone Company, Inc.(collectively, "Cingular Wireless").

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. AT&T Wireless Services, Inc. (now Cingular Wireless) was first designated as an eligible telecommunications carrier in the State of Washington by Order of the Commission dated April 13, 2004, in Docket No. UT-043011;
2. On October 26, 2004, AT&T Wireless Services, Inc. merged with Cingular Wireless, LLC. On March 2, 2005, Cingular Wireless filed a petition to amend the AT&T Wireless designation to reflect Cingular's post-merger operations. The Commission granted Cingular's Petition to Amend its designation by Order dated April 29, 2005 in Docket UT-043011¹;
3. During the calendar year 2004, Cingular Wireless provided the supported services required by 47 U.S.C. § 214(e) and as described in the Commission orders granting the Company ETC status;
4. During the calendar year 2004, Cingular Wireless has advertised the availability of supported services and charges for them as required by 47 U.S.C. § 214(e) and as described in the Commission orders granting it ETC status;
5. Funds received by Cingular Wireless from the federal high cost universal service support fund will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended;
6. The amount of all federal high-cost universal service fund support received by Cingular Wireless for the calendar year 2004 (this includes, but is not limited to, High Cost Local Support or "HCL," Local Switching Support or "LSS," Long Term Support or "LTS," Interstate Access Support or "IAS," and Interstate Common Line Support or "ICLS") is \$8.536 million.

¹ See In the Matter of Amending the Designation of AT&T Wireless PCS of Cleveland, LLC: AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; Yakima Cellular Telephone Company; Bremerton Cellular Telephone; Olympia Cellular Telephone Company; Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., Petition to Amend the Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, March 2, 2005; Order, April 29, 2005.

7. The loop counts on which federal high-cost universal support was based for support received during the calendar year 2004 are as follows²:

- (a) **1Q 2004**
 - HCM – 802,017
 - ICLS – 48,822
 - HCL – 71,333
 - IAS – 344,750

- (b) **2Q 2004**
 - HCM – 801,504
 - ICLS – 50,796
 - HCL – 70,819
 - IAS – 334,779

- (c) **3Q 2004**
 - HCM – 778,203
 - ICLS – 50,481
 - HCL – 69,321
 - IAS – 312,804

- (d) **4Q 2004**
 - HCM – 752,306
 - ICLS – 50,360
 - HCL – 69,104
 - IAS – 309,060

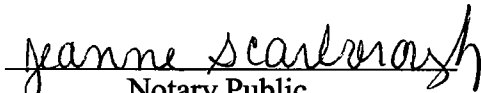
² Subscriber numbers are provided based on quarterly filing deadlines as prescribed by the Universal Service Administrative Company (USAC). The line count numbers included are those that were filed with USAC for each quarter in 2004.

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



Paul Roth
Executive Vice President
External Affairs and Public Relations
Signed at Atlanta, Georgia on
August 30, 2005

Subscribed and sworn to before me
this 30th day of August, 2005.


Notary Public

**NOTARY PUBLIC, FULTON COUNTY, GEORGIA
MY COMMISSION EXPIRES JUNE 6, 2009**

**CINGULAR WIRELESS LIFELINE/LINK-UP
2004 - 2005**

The Commission designated Cingular Wireless (formerly AT&T Wireless) eligible telecommunication carrier status for certain areas within the State of Washington on April 13, 2004. At that time, Cingular launched its Lifeline/Link Up offering in Washington State. In order to support and publicize the offering, Cingular created the following resources:

- (1) A dedicated, bi-lingual Lifeline Customer Care team supporting the following toll free number, 800-377-9450;
- (2) Lifeline brochures in English and Spanish that provided information about the company's Lifeline and Link Up offering, including pricing information and eligibility criteria;
- (3) Dedicated Lifeline Web site: www.attws.com/lifeline, which provided information about the offer and included applications available for downloading; and
- (4) Reached out the Department of Social and Health Services (DSHS) and offered to provide the agency with copies of our brochure to provide eligible consumers.¹

On October 26, 2004, Cingular Wireless merged with the former AT&T Wireless Services, Inc. On March 2, 2005, Cingular Wireless filed with the Commission a petition to amend the AT&T Wireless designation to reflect Cingular's post-merger operations.² During this period of company transition, Cingular was required to re-brand all of its existing Lifeline materials to reflect the Cingular name. We took this opportunity to increase our efforts to publicize Lifeline as follows:

- (1) The new Lifeline Web site is www.cingular.com/lifeline;
- (2) Brochures have been updated to reflect the new Cingular Lifeline offering and were distributed to all Cingular retail locations within our ETC service area;
- (3) Cingular launched an advertising campaign in newspapers across the state to publicize the availability of the offering;
- (4) At the recommendation of Commission Staff, Cingular contacted Tracey Rascon, Tribal Outreach Coordinator for the Affiliated Tribes of NW Indians to begin developing an outreach plan to communicate the availability of Lifeline to consumers living on tribal lands.

Copies of the resources mentioned above, where appropriate, have been included for your reference.

¹ Cingular was informed that DSHS preferred not to distribute the brochures for fear of showing favoritism to one Lifeline provider over another.

² See In the Matter of Amending the Designation of AT&T Wireless PCS of Cleveland, LLC: AT&T Wireless Services of Washington, LLC; Spokane Cellular Telephone Company; Yakima Cellular Telephone Company; Bremerton Cellular Telephone; Olympia Cellular Telephone Company; Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., Petition to Amend the Designation as an Eligible Telecommunications Carrier, Docket No. UT-043011, March 2, 2005.

Lifeline Publications and Run Dates

The enclosed "Lifeline Notice" ran as a quarter-page advertisement in the publications listed below.

March/April Lifeline Campaign	
Publication	Publication Date
Bellingham Herald	3/15/05
Mount Vernon Skagit Valley Herald	3/15/05
Everett Herald	3/15/05
Seattle Times	3/15/05
Bremerton Sun	3/15/05
Tacoma News Tribune	3/15/05
Olympia Olympian	3/15/05
Longview Daily News	3/15/05
Spokane Spokesman	3/15/05
Yakima Herald	3/15/05
Tri-City Herald	3/15/05
Puyallup Herald	3/17/05
Walla Walla Union Bulletin	3/15/05
Wenatchee World	3/15/05
<i>King County Journal Newspapers:</i>	
Auburn Reporter	4/13/05
King County Journal	3/21/05
Bellevue Reporter	4/13/05
Bothell/Kenmore Reporter	4/6/05
Kent Reporter	4/6/05
Redmond Reporter	4/13/05
Snoqualmie Valley Record	3/23/05
Mercer Island Reporter	3/23/05
<i>The Enterprise Newspapers:</i>	
Edmonds Enterprise	3/18/05
Shoreline/Lake Forest Park Enterprise	3/18/05
Lynnwood/Mountlake Terrace Enterprise	3/18/05
Mill Creek Enterprise	3/18/05
August Lifeline Campaign	
Tri-City Herald	8/16/05
Whidbey News-Times	8/17/05
Bainbridge Island Review	8/17/05
Central Kitsap Reporter	8/17/05
North Kitsap Herald	8/17/05
Port Orchard Independent	8/17/05
Journal of San Juan Islands	8/17/05
Mount Vernon Skagit Valley Herald	8/16/05

Longview Daily News	8/16/05
Yakima Herald	8/16/05
Puyallup Herald	8/18/05
Snoqualmie Valley Record	8/17/05
Anacortes American	8/17/05
Goldendale Sentinel	8/18/05
White Salmon Enterprise	8/18/05
Centralia Chronicle	8/16/05
Pullman News	8/18/05
Battle Ground Reflector	8/17/05
Ellensburg Record	8/17/05
Spokane Spokesman	8/16/05

Cingular Wireless Lifeline Service Notice

Qualified low-income residents may receive discounted service from Cingular Wireless under the Lifeline program. Customers must meet certain eligibility criteria based on income level or current participation in financial assistance programs. For questions or to apply for Lifeline service, call a Lifeline Customer Service Representative at 1-800-377-9450 or visit www.cingular.com/lifeline.



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BBDO

Client: CINGULAR
Art Director: ALOK

Job No.: CIN GEN P5 1717
Copywriter:

Size: 5.75X10.5
Production: CHRIS

Date: 4/26/2005
Traffic: STACEY

Studio	Proofreader	Copywriter	Art Director	Production	Creative Dir.	Acct. Exec.	Acct. Sup.

Cingular Lifeline Ad
1/4 page newspaper
AD CODE
PUB NAME

Keep the lines of communication open — affordably.

Lifeline and Link Up

AT&T Wireless is proud to offer Lifeline and Link Up for our customers who qualify.

These are government programs that help people who meet certain criteria pay for their wireless service and related fees.

Lifeline

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

How much can I save with Lifeline?

You can save between \$6.50 and \$10 a month with federal Lifeline discounting, and even more if you qualify for additional Lifeline discounts from your state. Right now, Lifeline Service is just \$19.99 a month, which is discounted depending on the federal and state support that's available in your area. 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 a month.

How many minutes will I get?

Monthly charge	\$19.99*	\$24.98
Daytime Minutes	185	165
Night and Weekend Minutes	185	160
Additional Minutes	185	160

*One thousand Night and Weekend Minutes may be purchased for \$4.99 a month.
All from your Local Service Area.



How do I qualify?

Requirements vary by state. If you live in a state that doesn't offer state Lifeline support, 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
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) (Section 8)
- Low-Income Home Energy Assistance (LIHEAP)
- National School Lunch Free Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)

If you live on Tribal Lands, you may 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 for Tribal Administered Temporary Assistance for Needy Families (Tribal TANF)
- Tribal Administered School Lunch Free Lunch Program (Tribal NSLP)
- Tribal Administered Head Start (meeting income qualifying standards)

If you live in a state that does offer state Lifeline support, you just need to meet the criteria defined by your state as they appear in the Lifeline and Link Up application form for your state available from AT&T Wireless.

Are there any restrictions?

Yes. You can only get Lifeline support for one phone line based from your principal residence and billed to your name.

How do I sign up?

Just complete the Lifeline and Link Up application form and certify that you participate in a qualifying government program or otherwise meet the eligibility standards. If you'd like a copy of the application, just stop by an AT&T Wireless Store or Authorized Dealer within your state, call 1 800 377-9450 or visit attwireless.com/lifeline.

What if I no longer qualify for Lifeline benefits?

It's up to you to let us know if and when you stop qualifying for Lifeline benefits. At that time, you'll stop receiving them.

What if I don't plan on making any toll or long-distance calls with my wireless phone?

If you prefer, you can choose Toll Blocking which prevents anyone using your phone from making any outgoing toll or long-distance calls. If you choose Toll Blocking when you activate service, you won't be charged for a service deposit or use of the feature. But if you decline Toll Blocking at activation, you may be charged a deposit of up to \$200 by AT&T Wireless. Any long-distance calls you make will be charged at 49¢ a minute plus applicable airtime or roaming charges. International long distance calling will be blocked.

Link Up

Link Up helps people who qualify for Lifeline support pay for their activation fee and/or any related installation charges.

How much can I save with Link Up?

Link Up will pay half of your one-time \$36 activation fee, or \$18. For the remaining \$18, you can make regularly scheduled payments—deferring full payment for up to a year.

How do I know if I qualify?

Simple. If you qualify for Lifeline, you qualify for Link Up.

Are there any restrictions?

Yes. You can get Link Up benefits only once at the same address, and they can only be applied toward your activation fee and/or any related installation charges, never toward equipment on your premises or your phone. Finally, you can't apply your Link Up benefits to any activation or installation charges you paid prior to signing up for the Lifeline and Link Up programs.

Additional Terms and Conditions

Lifeline and Link Up Service is subject to the terms and conditions found in the Service Agreement package with your plan, Rate Plan brochure, Sales Information and Lifeline and Link Up Contact Holder.

Comunicación abierta y por poco dinero.

Lifeline y Link Up

AT&T Wireless se complace en presentar los programas Lifeline y Link Up.

Estos programas gubernamentales ofrecen ayuda para pagar el servicio inalámbrico y cargos relacionados a personas que cumplen con ciertos criterios.

Lifeline

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

¿Cuánto puedo ahorrar con Lifeline?

Puedes ahorrar entre \$6.50 y \$10 por mes, con el descuento federal de Lifeline, e incluso más, si reúnies los requisitos para descuentos adicionales de Lifeline en tu estado. En este momento, el servicio de Lifeline cuesta solo \$9.50 por mes, tras recibir los descuentos de la asistencia federal y estatal que se ofrece en tu área.

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

¿Cuántos minutos voy a recibir?

Carga mensual	\$19.99*	\$24.98
Minutos a cualquier hora	45	75
Minutos de noche y de fin de semana	45	100
Minutos adicionales	45	75

*Se puede adquirir 1000 minutos de noche y de fin de semana por \$4.99 mensuales. Todo desde tu área local de servicio.



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¿Existen restricciones?

Si la asistencia de Lifeline se puede usar únicamente con una línea de teléfono, en la residencia principal, facturada a tu nombre.

¿Cómo suscribirme?

Completa el formulario de solicitud de Lifeline y Link Up, y verifica que participas en uno de los programas gubernamentales seleccionados o que cumples con los requisitos necesarios. Para recibir una solicitud, visita una de las tiendas de AT&T Wireless o un concesionario autorizado en tu estado, llama al 1 800 377-9450 (una llamada sin cargos de larga distancia) o visita el sitio attwireless.com/lifeline. El sitio se ofrece sólo en inglés.

¿Qué sucede si dejo de cumplir con los requisitos?

Si en algún momento dejas de cumplir con los requisitos, nos deberás avisar en ese momento. A partir de entonces, dejará de recibir los beneficios.

¿Qué pasa si no voy a hacer llamadas con cargo o de larga distancia?

Si prefieres, puedes optar por el Bloqueo de llamadas, para que nadie pueda usar el teléfono para hacer llamadas con cargo o de larga distancia. Si optas por esta función al activar el servicio, no te cobraremos el depósito de servicio ni los cargos de uso de la función. De otra manera, AT&T Wireless te cobrará un depósito de hasta \$200. Las llamadas de larga distancia se cobran a 45¢ por minuto, más tiempo de distancia internacional. Las llamadas de larga distancia internacional estarán bloqueadas.

Link Up

El programa Link Up ayuda a las personas que reciben los beneficios de Lifeline a pagar el cargo de activación y los cargos relacionados con la instalación.

¿Cuánto puedo ahorrar con Link Up?

Link Up cubre la mitad del cargo único de activación, es decir \$18 de los \$36. Los \$18 restantes se pueden pagar en cuotas periódicas durante el plazo de un año.

¿Cómo sé si reúno los requisitos?

Es muy simple: si reúnes los requisitos para Lifeline, también puedes recibir los beneficios de Link Up.

¿Existen restricciones?

Si puedes recibir los beneficios de Link Up sólo una vez en la misma dirección y se pueden usar únicamente para cubrir el cargo de activación y los cargos de instalación relacionados. No se pueden usar para comprar el teléfono o equipo. Tampoco se pueden usar los beneficios de Link Up para pagar cargos de activación o instalación anteriores al momento en que te suscribiste a los programas Lifeline y Link Up.

Términos y condiciones adicionales

El servicio de Lifeline y Link Up está sujeto a los términos y condiciones del Contrato de servicio que se incluye con el teléfono, en el folleto del Plan de tarifas, la información de venta y en la Hoja de Información Adicional de Lifeline y Link Up.