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June 29, 2016

# 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:** 2016 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 to WAC 480-123-080, 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 portions of Exhibits B - D. 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 portions of Exhibits B which reflects in granular detail the status of the network improvements AT&T Mobility has undertaken for calendar year 2015 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 2017; Exhibit C contains information about customer locations; and, Exhibit D 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.

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 included in this filing as an attachment.

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

Sincerely,

Sharon Mullin

Sharm Mullin

**Enclosures** 

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

#### Carrier Report for 2015 and 2017 Annual Plan

AT&T Mobility, study area code ("SAC") 529910,<sup>1</sup> submits its Annual Eligible Telecommunications Carrier Report for 2015 ("2015 Report") and Annual Plan for 2017 in accordance with WAC 480-123-060 to WAC 480-123-080.

#### I. AT&T MOBILITY ETC REPORT FOR 2015

### A. Annual Certification of Eligible Telecommunications Carriers

With this filing AT&T Mobility requests continued certification as an eligible telecommunications carrier ("ETC") in Washington. In accordance with WAC 480-123-060, AT&T Mobility **Exhibit A** contains the certification that all federal universal service support was used in the preceding calendar year (2015) and will be used in the coming calendar year (2017) 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 2015

# 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 reports outages to the Universal Service Administration Company ("USAC") and the Federal Communications Commission ("FCC") as confidential attachment "529910WA220" to the Form 481 filed on or before July 1, 2016. A copy of the Form 481 and all attachments is also filed with the Washington Utilities and Transportation Commission ("Commission"). As AT&T Mobility is providing the outage information as part of its Form 481 filing, it is not providing the same information in this report.

<sup>&</sup>lt;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).

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

AT&T Mobility had three (3) unfulfilled requests for service in calendar year 2015. AT&T Mobility has employed the standard adopted by the FCC in 47 C.F.R. §54.202(a)(1)(B) for evaluating requests for service. The details of the unfulfilled requests for service and how AT&T Mobility attempted to provide service are attached hereto as **Confidential Exhibit C**.

# 4. Report on complaints per one thousand connections (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 along with the complaint category is attached hereto as **Confidential Exhibit D**.

# 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 2015, 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) was recently revised and now requires a wireless carrier to demonstrate that it has a reasonable amount of backup power (fixed, portable or other backup power source) for its cell sites and specifies certain backup power requirements for switches. AT&T Mobility provides backup power for its cell sites through a combination of batteries and portable and/or permanent generators. AT&T Mobility's switches in Washington have automatic start generators and over three (3) hours of battery reserve.

In addition to the backup power standards AT&T Mobility annually completes the recertification program for Business Continuity/Disaster Recovery offered through CTIA. In 2015 CTIA deemed AT&T Mobility as compliant with the principles, objectives and requirements of this program. The CTIA seal for Consumer Protection and Business Continuity/Disaster Recovery are found as attachments in the Form 481 as Exhibit 529910WA510 and Exhibit 529910WA610 respectively.

# 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 2015 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. <u>Exhibit E</u> is an example of AT&T Mobility's Lifeline brochure available in 2015 for tribal and non-tribal areas;
- Maintained a dedicated Lifeline website with information about Lifeline Service along with an application <a href="http://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp">http://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp</a>.

- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, an example of AT&T Mobility's Lifeline advertisement for 2015 is included in <u>Exhibit F</u>.
   <u>Exhibit G</u> 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 H is the postcard used for this direct mail campaign; and,
- AT&T Mobility contacted various social service agencies/groups about its Lifeline Service

AT&T Mobility distributed Lifeline packets to the following tribes, Tulalip, Stillaguamish, Samish, Muckleshoot and Puyallup Tribes.

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

Confidential Exhibit B contains AT&T Mobility's projected receipt of federal high cost support in 2017. The FCC previously ordered that the federal high cost support AT&T Mobility receives in Washington be phased out over five years with the first 20% reduction beginning July 1, 2012, and an additional 20% reduction each subsequent year until July 1, 2016. As the 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)). AT&T Mobility has projected disbursements at the June 30, 2014 level and will continue to do so until further information is provided by the FCC. Confidential Exhibit B also contains AT&T Mobility's plan to utilize the federal high cost support it receives for the period of January 1, 2017 through December 31, 2017 assuming no reduction in support in 2017.

# Exhibit A

# AT&T MOBILITY LLC ANNUAL CERTIFICATION 2016

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 certify to the Washington Utilities and Transportation Commission ("Commission") under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge:

- 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 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 2015 and will be used in 2017 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 2015, 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 2015, AT&T Mobility met the applicable service quality standards and consumer protection rules by complying substantially with the CTIA Consumer Code for Wireless Service as required by WAC 480-123-070(5);
- 5. During calendar year 2015, AT&T Mobility had the ability to function in an emergency and met the applicable requirements as required by WAC 480-123-070(6) as described in the AT&T Mobility Annual ETC Report for 2015 and 2017 Annual Plan; and,

<sup>&</sup>lt;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>&</sup>lt;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.

6. During calendar year 2015, 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).

Michael C. Maxwell

Vice President/General Manager

Pacific Northwest Market

June <u>23</u>, 2016

Subscribed and sworn to before me this <u>23</u> day of June, 2016

Notary Public

OFFICIAL STAMP

KARON L LEAL

NOTARY PUBLIC-OREGON

COMMISSION NO. 950842

MY COMMISSION EXPIRES MAY 11, 2020

# Exhibit B

AT&T Mobility Use of ETC Support in 2015 and 2017

# Exihibit B - Report on Use of 2015 Federal High Cost Support

ILEC Study Area (list every study area)	Wire Center CLLI (list every wire center)	Project (e.g. cell site, radio, cabinets, etc.) or if no project for the W/C provide reason why	Start Date	Completion Date	Capital Investment	2015 Expense (Utilities, Lease, Interconnect)	Capital and Expense investment for 2015
		REDACTED					
					REDACTED	REDACTED	REDACTED

REDACTED 2015 Total Disbursement from High Cost Support

Note: 1st Carrier is a capacity augment increasing the transport and therefore the voice/data capacity available at the site.

#### Customer benefit (2015):

- NSB (New Site Build) This new cell site will increase coverage to an area with a population of over 4,000.
- 1<sup>st</sup> Carrier These sites were upgraded from second generation ("2G") technology to UMTS which along with increasing capacity provides customers with more uniform voice quality along with the ability to employ advanced voice features and simultaneous voice and data service usage. In addition, customers enjoy higher data speeds.
- LTE Upgrade These cell sites were upgraded to LTE (4G) which improves capacity. Customers will enjoy much faster data speeds than 3G technology.
- Operating Expense Supports expenses associated with sites built with ETC support allowing customers to have access to a robust network in Washington ETC areas.

# Exihibit B - 2017 Washington Service Improvement Plan

ILEC Study Area (list every study area)	Wire Center CLLI (list every wire center)		Project (e.g. cell site, radio, cabinets, etc.) or if no project for the W/C provide reason why	Start Date	Completion Date	Capital Investment		Capital and Expense investment for 2017
			REDACTED					
_								
					REDACTED	REDACTED	REDACTED	

REDACTED

2017 Total Disbursement from High Cost Support

### Customer benefit (2017):

• Operating Expense – Supports expenses associated with sites built with ETC support allowing customers to have access to a robust network in Washington ETC areas.

# **Exhibit C**

2015 Service Extension Requests ("SERs")

### **Exhibit C**

### 2015 Service Extension Requests ("SERs")

ETC SER UNFULFILLED REDACTED ADDRESS: REDACTED

Customer requests a Service Extension Request due to little and/or no service for 3 Months.

#### Evaluation:

- A.) Modify or replace the customer's equipment.
  - This is unlikely a handset issue. Based on current coverage map, the area is very remote and has little to no coverage.
- B.) Deploy a roof-mounted antenna or other equipment.
  - A 3G Microcell is an option to improve in-building performance. Unfortunately the 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 distant.
- 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.

### <u>REDACTED</u>

EXHIBIT C – Page 2 of 3

ETC SER UNFULFILLED REDACTED ADDRESS: REDACTED

Customer requests a Service Extension Request due to no coverage in the area. The customer just moved so a short duration of about a week.

#### Evaluation:

- A.) Modify or replace the customer's equipment.
  - This is unlikely a handset issue. Based on complaint and current coverage map, the region is remote and the customer is in a valley surrounded by rough and hilly terrain.
- B.) Deploy a roof-mounted antenna or other equipment.
  - A 3G Microcell is an option to improve in-building performance. Unfortunately the 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 distant.
- 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 does have a site in the long range plans for this area that is currently in-line for funding.

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

EXHIBIT C – Page 3 of 3

ETC SER UNFULFILLED REDACTED ADDRESS: REDACTED

Customer requests Service Extension Request. He is working as Border Control near Danville, WA when on patrols in the area. Some service but spotty.

#### Evaluation:

- A.) Modify or replace the customer's equipment.
  - This is unlikely a handset issue. Based on current coverage map, the area is very remote and has little to no coverage.
- 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.
  - The region is very remote but 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.

### **Exhibit D**

### **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 2015. 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 (WA AG) of Washington or **REDACTED** per 1,000 customers.

The following table includes the complaints received and the outcome with the FCC and WA AG. 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.

WA Complaints Summary				
Category	Total			
Billing/Billing				
Issue/Collections/Fees/Payment				
Equipment/Feature				
Misc	REDACTED			
Network				
Point of Sale				
Policy				
Grand Total				

# Exhibit E AT&T Mobility Lifeline Brochure

# AT&T Lifeline Service

Washington

# Discounted service for gualified customers

# Lifeline

# Exhibit E - Washington Lifeline Brochure feline service for only \$1574 per month

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 quidelines 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.

# 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:

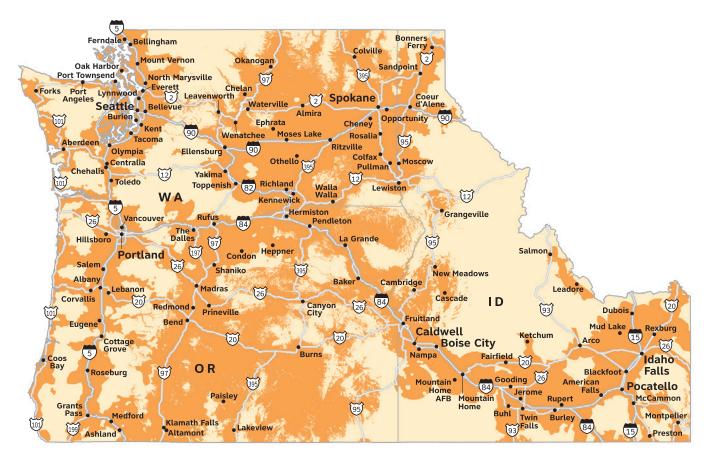
AT&T **ATTN: Contract Services** PO Box 2377 Jacksonville. Texas 75766

If you cannot access the application form from http://www.att.com/mobility-lifeline, just call 800.377.9450 and an application will be mailed to you.

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



# 300 Anytime Minutes / 1000 Night & Weekend Minutes<sup>†</sup> 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 800.377.9450, Monday through Friday between the hours of 10:00 a.m. - 7:00 p.m. CST.

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 airtime 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 airtime minutes used will be discounted from minutes included in the plan. International roaming is not available. No rollover can be made. The airtime 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 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. © 2015 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 08/2015.



# Servicio AT&T Lifeline

Washington

Servicio con descuento para clientes



# Lifeline

# Exhibit E - Washington Lifeline Broch Gervicio Lifeline por sólo \$1574 al mes

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 v 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 iquales 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 FDPIR)

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.

# Para inscribirte

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

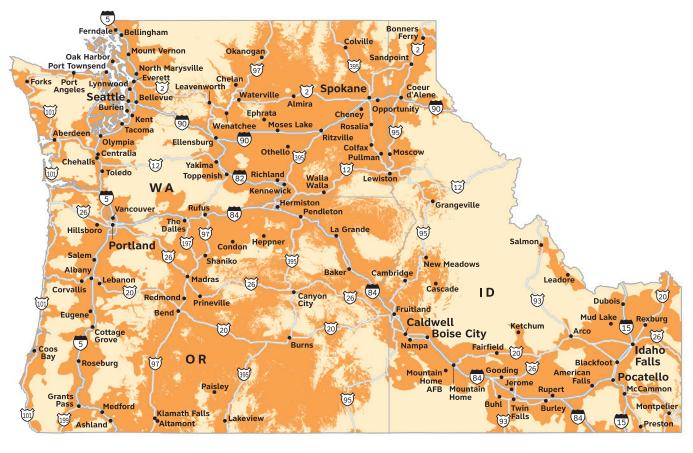
**ATTN: Contract Services** PO Box 2377 Jacksonville, Texas 75766

Si no puedes tener acceso al formulario de solicitud desde http://www.att.com/mobility-lifeline, llama al 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.



# Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana<sup>†</sup>, 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 800.377.9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central)

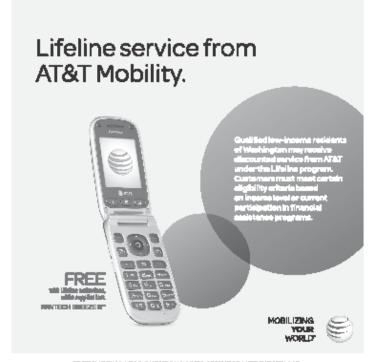
La información que aparece en la pantalla del teléfono no indica la tarifa que se cobrará. Es importante revisar el mapa de cobertura para ver las áreas que se incluyen en el plan. El mapa muestra una aproximación de la cobertura al aire libre. El mapa puede incluir áreas en las que otras empresas no 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 dependerán del lugar donde se transmite y recibe la llamada, mas 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. tLos períodos 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 qubernamentales 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

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. © 2015 AT&T Intellectual Property. Todos los derechos reservados, AT&T, el logotipo de AT&T y todas las otras marcas contenidas aguí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Actualizado: 08/2015.

#### Exhibit F

## AT&T Mobility Lifeline Advertisement

Exhibit F - 2015 Washington Lifeline Ad Template



FREE SHIPPING | FOR QUESTIONS OR TO APPLY FOR LIFELINE SERVICE, CALLAUFEUNE CURTOHER BENYCERER BENTATIVE AT 1-400-377-0460 OR VIGIT WWW.ATT.COM/HOBILITY-LIFELINE.

SERVICE AVAILABLE AT \$15.74 SERVICE AVAILABLE AT \$15.74 armin among apat. Indules 200 Anythra Milwais, nationalising distance, and 1,000 high-and-united minutes. If you live on Tribel lands and qualify, you could get Enhanced Lifeline support, which can reduce your window hill to as \$t.te as \$t.

#### ADDITIONAL SERVICE PLANS AVAILABLE STARTING AT \$4 MINIMUM RATE PLAN INCLUDES:

- No rearning or long distance charges No additional charge to dial "0" for
- No additional charge to call 9-1-1
- Unlimited minutes per month
   Unlimited texts per month
   Unlimited texts per month

  - operator essistance to complete a cell

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 will'filly make bite statements in order to obtain the benefit can be punished by line or imprisonment or can be barred ham the program. Forms of documentation necessary for enrollment All subscribers will be equired 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 households. least on (1) household income at or below 1998 of Federal Poverty Level guidelines for a household of that size; OR (2) the households participation in one of the federal assistance programs. It Current or prior year's statement of benefits from a qualifying state, federal, or lifted program. 2A notice letter of participation in a qualifying state, federal, or lifted program. 2 Program participation documents (e.g., consumer SMAP cost, Medicald cond, or copy thereof, 4: Other official document evidencing the consumer's participation in a qualifying state, federal, or lifted program, content income statement from an employer or psycheck. Social Security statement of benefits, Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment/Workers' Compensation statement of benefits. Federal or lifted notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for letter free [3] morehor time. AT&T Mobility will NOT retain a copy of the document state. Piching is for a basic or message on AT&T Mobility will NOT retain a copy of the document state. 30 MB plan. Additional monthly charges for extra devices and data. Other charges and restrictions apply, both a store or att. com/mobile:there for details. Gen. Wireless Svo. Terms Subject to Wireless Customer Agent or applicable Business Agent. Activation (es S40)/line & add I deposits may apply. Credit approval regid. Coverage & soc. not swall everywhere. Other restris apply & may result in soc. termination. Visit a store or att.com/mobiles/hererables for more info. Screen images strukted. 02(1) 5 AT&T intellectual Property. All rights reserved. All other marks used herein are the property of their respective owners.

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6/11/2015 2:50:29 PM

 $\label{eq:exhibit} Exhibit G$   $\label{eq:exhibit} \textbf{Lifeline Print Publications and Dates} - 2015$ 

Publication	Insertion Date			
Bellingham Herald	Week of 3/22/15			
Kitsap Sun	Week of 3/22/15			
Longview Daily News	Week of 3/22/15			
Olympia Olympian	Week of 3/22/15			
Port Townsend Leader	Week of 3/22/15			
Seattle Times	Week of 3/22/15			
Spokane Spokesman-Review	Week of 3/22/15			
Tacoma News Tribune	Week of 3/22/15			
The Columbian	Week of 3/22/15			
Tri-City Herald	Week of 3/22/15			
Whidbey News-Times	Week of 3/22/15			
Yakima Herald-Republic	Week of 3/22/15			
Bellingham Herald	Week of 6/14/15			
Kitsap Sun	Week of 6/14/15			
Longview Daily News	Week of 6/14/15			
Olympia Olympian	Week of 6/14/15			
Port Townsend Leader	Week of 6/14/15			
Seattle Times	Week of 6/14/15			
Spokane Spokesman-Review	Week of 6/14/15			
Tacoma News Tribune	Week of 6/14/15			
The Columbian	Week of 6/14/15			
Tri-City Herald	Week of 6/14/15			
Whidbey News-Times	Week of 6/14/15			
Yakima Herald-Republic	Week of 6/14/15			
Bellingham Herald	Week of 9/20/15			
Kitsap Sun	Week of 9/20/15			
Longview Daily News	Week of 9/20/15			
Olympia Olympian	Week of 9/20/15			
Port Townsend Leader	Week of 9/20/15			
Seattle Times	Week of 9/20/15			
Spokane Spokesman-Review	Week of 9/20/15			
Tacoma News Tribune	Week of 9/20/15			
The Columbian	Week of 9/20/15			
Tri-City Herald	Week of 9/20/15			
Whidbey News-Times	Week of 9/20/15			
Yakima Herald-Republic	Week of 9/20/15			

# Exhibit G (continued)

# **Lifeline Print Publications and Dates – 2015**

Publication	Insertion Date			
Bellingham Herald	Week of 11/15/15			
Kitsap Sun	Week of 11/15/15			
Longview Daily News	Week of 11/15/15			
Olympia Olympian	Week of 11/15/15			
Port Townsend Leader	Week of 11/15/15			
Seattle Times	Week of 11/15/15			
Spokane Spokesman-Review	Week of 11/15/15			
Tacoma News Tribune	Week of 11/15/15			
The Columbian	Week of 11/15/15			
Tri-City Herald	Week of 11/15/15			
Whidbey News-Times	Week of 11/15/15			
Yakima Herald-Republic	Week of 11/15/15			

#### Exhibit H

# AT&T Mobility Lifeline Direct Mail Postcard





# Get a phone with Seattle, WA 98111-9266 affordable service



# 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.



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

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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 eart plan before applications at <a href="http://att.com/mobility-lifeline.">http://att.com/mobility-lifeline.</a> \*Reaming\* 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 errollment: All subscribers will be subscriber will be assistance. Program at restrictions apply. Forms of documentation necessary for errollment at subscribers will be assistance. Program at restrictions apply. Forms of the program. Income eligible in the program income eligible in the program. Income eligible in the program income eligible in the program. Income eligible in the program income eligible in the