BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMITTEE

In the Matter of Frontier Communications) Northwest, Inc.'s Petition to be Regulated) As a Competitive Telecommunications) Company Pursuant to RCW 80.26.320)

Docket No. UT-121994

EXHIBIT JP-41

AT&T Mobility (SAC 529910) Annual Eligible Telecommunications Carrier Report for 2011 and 2013 Annual Plan

AT&T Mobility, study area code ("SAC") 529910,¹ submits its Annual Eligible Telecommunications Carrier Report for 2011 ("2011 Report") and Annual Plan for 2013² in accordance with the rules that apply to Eligible Telecommunications Carriers ("ETCs").

I. AT&T MOBILITY ETC REPORT FOR 2011

A. Annual Certification of Eligible Telecommunications Carriers

With this filing AT&T Mobility is requesting continued certification as an ETC in the state of Washington. In accordance with WAC 480-123-060, AT&T Mobility provides a certification in **Exhibit A** that it will use the federal universal service support 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 2011

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**.

AT&T Mobility's federal high cost support receipts for 2011 were impacted by USAC's implementation of the 2008 *Dobson ETC Cap.*³ Although the *Dobson ETC Cap* was originally

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. 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, <u>Order Granting Petition for Designation as an Eligible Telecommunications Carrier</u>, Docket No. UT-043011, Order No. 02 (April 29, 2005); New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton 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, <u>Order Granting Amendment of Designation as an Eligible Telecommunications Carrier to Include Wire Centers in Washington Rural Service Area 2 and 3</u>, Docket UT-04-3011, Order 03 (October 15, 2009); and, Letter to David W. Danner, UTC, from Sharon Mullin, AT&T (May 31, 2012).

² As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner for its 2011 Report and 2013 Annual Plan.

³ In the FCC Dobson Merger Approval, an interim cap was set on AT&T Mobility's ETC receipts. See *In the Matter of Applications of AT&T Inc., and Dobson Communications Corporation, For Consent to Transfer Control of Licenses and Authorizations*, File Nos. 0003092368 et al, WT Docket No. 07-13, para. 71. AT&T refers to this as

ordered in November 2007, USAC did not implement the Dobson ETC Cap until April 2011 disbursements. As USAC did not deduct the *Dobson ETC Cap* from its disbursements to AT&T Mobility, AT&T Mobility estimated the amount of the high cost disbursements attributable to the *Dobson ETC Cap* for each state and placed this amount in a reserve account. See AT&T's Annual Recertification filing dated July 31, 2009. When USAC recovered the *Dobson ETC Cap* from April 2011 disbursements, AT&T Mobility released the reserve amount which was greater than the amount USAC recovered; this amount is reflected in **Confidential Exhibit B** and was spent in 2011.

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

AT&T Mobility's local service outage report for calendar year 2011 is attached hereto as **Confidential Exhibit C**. The report includes information on every outage impacting the supported services that was thirty minutes or longer in duration and includes: (a) date and time of onset and duration; (b) description of the outage; (c) particular services affected; (d) geographic area affected; (e) steps taken to prevent a similar situation in the future; and (f) estimated number of customers affected.

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

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

AT&T Mobility had zero unfulfilled requests for service in calendar year 2011. AT&T Mobility has employed the standard adopted by the Federal Communication Commission ("FCC") in 47 C.F.R. §54.202(a)(1)(B) for evaluating requests for service.

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

AT&T Mobility's report with separate totals for the numbers of complaints from customers in Washington made to the FCC and the consumer protection division of the office of the attorney general of Washington is attached hereto as <u>Confidential Exhibit D</u>. This exhibit also generally describes the nature of the complaint and AT&T Mobility's efforts to resolve the matter.

It should be noted that due to system limitations the information provided in this report is for the entire state of Washington and not just the areas in which AT&T Mobility is designated as an ETC.

the "*Dobson ETC Cap*" and this cap was in effect from November 15, 2007 to August 1, 2008, when the industrywide interim cap went into effect. USAC, however, did not recover the amounts associated with the *Dobson ETC Cap* until April 2011.

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 2011, AT&T certified to CTIA that it had adopted the principles, disclosures and practices set forth in the CTIA Code. Included in <u>Exhibit A</u> is AT&T Mobility's certification of substantial compliance with this requirement.

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

To comply with this requirement an ETC must certify that it has adhered to the requirements in WAC 480-123-030(1)(g). WAC 480-123-030(1)(g) requires wireless providers that are ETCs to have "four hours of back up battery power at each cell site, back up generators at each microwave hub, and at least five hours back up battery power and back up generators at each switch."

AT&T Mobility complies with the backup power requirement for its switches and microwave hubs within its ETC designated area. With respect to the requirement regarding four hours of battery backup at all cell sites, on February 15, 2007, the Commission issued Order 01 (Docket UT-063060) which required that by February 15, 2009 AT&T Mobility have four hours of backup power at its priority and coverage cell sites within its ETC designated area using a reliable alternate power sources (battery, fixed generators or fuel cells). On March 6, 2009, AT&T Mobility submitted a Compliance Report and Request for Limited Extension of Partial Exemption ("Back-up Power Report")⁴ which showed that all but three of its priority and coverage cell sites had been augmented to comply with the 4-hour backup power requirement. In that same filing, AT&T Mobility requested a one year extension for the three priority and coverage cell sites that due to various reasons were not able to be upgraded by February 15, 2009. In Order 02, Ordering Paragraph 4, the Commission granted AT&T Mobility a one-year extension for these three cell sites⁵ and the upgrades were completed.

On August 3, 2009, AT&T Mobility filed with the Commission a Request for Clarification or in the Alternate an Extension for Compliance with the 4-hour backup power requirement for its non-priority sites. The Commission in Order 02 (Docket UT-063060) decided that all of AT&T Mobility's cell sites within its ETC designated area must meet the 4-hour back-up power requirement; however, the Commission granted AT&T Mobility until July 1, 2012 to meet this requirement for its non-priority sites, subject to certain conditions. One condition was that AT&T Mobility must include a compliance status report on backup power upgrades in its annual

⁴ See Cingular's Request for Permanent Waiver or in the Alternate a Temporary Waiver of WAC 480-123-070(6) Regarding Eligible Telecommunications Carrier Requirements, Docket UT-063060; Compliance Report and Request for Limited Extension of Partial Exemption.

⁵ The Commission subsequently issued Order 03 in this docket to clarify paragraph 15 of Order 02.

ETC filing with the Commission. <u>Confidential Exhibit E</u> contains AT&T Mobility's status report.

On April 12, 2012, AT&T Mobility filed a Request for Permanent Waiver of Sixteen Cell Sites or in the Alternate Extension for Compliance with the 4 hour backup power requirement. On May 16, 2012, AT&T Mobility filed an amendment to its original request reducing the number of cell sites to two. The Commission in Order 04 (Docket UT-063060) granted AT&T Mobility's request for a temporary exemption of one year from WAC 480-123-070(6) and WAC 480-123-030(1)(g).

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 2011 to support its Lifeline Service program. AT&T Mobility continues to look for methods to improve its outreach activities.

- 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 and Link Up offering, including pricing information and eligibility criteria.
 <u>Exhibit F</u> is an example of AT&T Mobility's Lifeline brochure available in 2011 for tribal and non-tribal areas;⁶
- Maintained a dedicated Lifeline website with information about Lifeline Service along with an application <u>www.att.com/mobility-lifeline;</u>
- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, a copy of AT&T Mobility's Lifeline advertisement in 2011 is attached as <u>Exhibit G.⁷</u> <u>Exhibit H</u> contains a list of publication names, dates, and targeted geographic area;
- 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.
 <u>Exhibit I</u> is the postcard used for this direct mail campaign;

⁶ Pursuant to the FCC's Lifeline Order, AT&T Mobility has removed Linkup in 2012. *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012), ¶245.

⁷ AT&T Mobility is currently updating its Lifeline brochure to meet the FCC's new requirements.

- AT&T Mobility contacted various social service agencies/groups about its Lifeline Service; and,
- AT&T Mobility also contacted federally recognized tribal governments across the state regarding the availability of its Lifeline Service.

II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080 for October 1, 2012 through September 30, 2013

<u>Confidential Exhibit J</u> contains AT&T Mobility's projected receipt of federal high cost support in 2013 under the current federal rules, including the reduction in federal high cost support for competitive ETCs ("CETCs"). The exhibit also contains AT&T Mobility's plan to utilize the federal high cost support it receives for the period of January 1, 2013 through December 30, 2013.⁸

The anticipated federal high cost support was calculated by reviewing the USAC Frozen Capped Support Report. If the federal high cost support that AT&T Mobility receives is less than it currently anticipates, AT&T Mobility may reduce or eliminate some projects included in its plan for 2013. AT&T Mobility further notes that there may be factors outside of its control that cause a delay to a project listed in the plan for 2013, such as zoning/permitting issues, lease negotiations, back-order of equipment and so forth. Unfortunately, these delays may cause a project to be moved to a subsequent calendar year for completion.

<u>Confidential Exhibit K</u> is a map depicting the coverage and cell sites added in 2011 and projected cell site locations for 2013.

⁸ As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported its expected receipt and use of ETC funds for calendar year 2013.

Exhibit A

Certification

Exhibit A

AT&T MOBILITY LLC ANNUAL CERTIFICATION July 2012

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

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

- 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-043011¹ which was expanded by Order 03 dated October 15, 2009 in the same docket;². 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;³
- 2. Federal universal service support received by AT&T Mobility was used in 2011 and will be used in 2013 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 2011, 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 2011, AT&T Mobility met the applicable service quality standards by complying substantially with the CTIA Consumer Code for Wireless Service as required by WAC 480-123-070(5);

³ See Letter to David W. Danner, UTC, from Sharon Mullin, AT&T (May 31, 2012).

¹ 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, <u>Order</u> <u>Granting Petition for Designation as an Eligible Telecommunications Carrier</u>, Docket No. UT-043011, Order No. 02 (April 29, 2005).

² 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).

- 5. During calendar year 2011, A&T Mobility had the ability to function in an emergency and met the applicable requirements as modified by the Commission in Docket UT-063060, Orders 01 - 03 regarding the installation of backup power at its cell sites; and,
- 6. During calendar year 2011, AT&T Mobility publicized the availability of its Lifeline Service in a manner reasonably designed to reach those likely to qualify for service in accordance with WAC 480-123-070(7).

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

Michael C. Maxwell

Vice President/General Manager Pacific Northwest Market July **27**, 2012

Subscribed and sworn to before me this 27th day of July, 2012

Melen Lois Ball

Notary Public			
	OFFICIAL SEAL		
	HELEN LOIS BALL NOTARY PUBLIC - OREGON		
	COMMISSION NO. 455422		
MY COMMISSION EXPIRES JANUARY 23, 2015			

CONFIDENTIAL Per WAC 480-07-160

Exhibit B AT&T Mobility Use of ETC Support in 2011

AT&T Mobility received **REDACTED** in federal high cost support and released **REDACTED** which had been held in a reserve account for *the Dobson ETC Cap*. As such, AT&T Mobility had **REDACTED** in federal high cost support for the calendar year 2011 and utilized that support as outlined below. In addition to the items included in the table below, AT&T Mobility expended additional funds in Washington to improve the coverage, capacity and reliability of its network.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
Total		REDACTED

CONFIDENTIAL PER WAC 480-07-160

Exhibit C 2011 Outage Report

REDACTED

CONFIDENTIAL PER WAC 480-07-160

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 2011. 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 or **REDACTED** per 1,000 customers.

The following report includes the complaints received. 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.

CONFIDENTIAL PER WAC 480-07-160

Exhibit E AT&T Back-Up Power Report in Compliance with Order 02, Docket No. 063060

AT&T has installed backup power at all of its cell sites within its ETC designated area. At the two cell sites that were the subject of Order 04 (Docket No. 063060)(**REDACTED**), AT&T Mobility has installed a temporary generator; however, these generators are hardwired and will turn on in the event of commercial power failure. As such, AT&T Mobility has complied with the 4-hour backup power requirement at all of its cell sites within its ETC designated area.

The following table details per Order 02 (Docket No. 063060) the number of cell sites per year that were augmented with 4-hours of backup power and the amount of ETC support utilized.

Year	Number Cell	ETC Support Utilized
	Sites Added 4	
	Hours Backup	
	Power	
2010	REDACTED	REDACTED
20119	REDACTED	REDACTED
2012	REDACTED	REDACTED

⁹ In its September 9, 2011 ETC Certification filing with the Commission, AT&T Mobility estimated that it would complete backup power augmentation on **REDACTED** sites in 2011. In fact, AT&T Mobility was able to complete the backup power augmentation on **REDACTED** more sites than expected for a total of **REDACTED** in 2011.

Exhibit F AT&T Mobility Lifeline Brochure

Lifeline and Link Up: Washington





Discounted service for qualified customers



Lifeline

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

Save Money With Lifeline

Lifeline service is just \$24.99 a month, which is then discounted depending on the federal and state support that's available in your area. Right now, you can save as much as \$8.25 each month with federal Lifeline discounting, and even more if you qualify for additional Lifeline discounts from your state.

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

Qualifying for Lifeline

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 (not Medicare)
- 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 National School Lunch Program (Tribal NSLP)
- Tribal Administered Head Start (meeting income qualifying standards)

If you live in a state that offers state Lifeline support, you must meet the criteria as defined in the state Lifeline and Link Up application form, which is available at http://www.wireless.att.com/about/community-support/ lifeline-link-up.jsp or by calling 1-800-377-9450.

Please note: You are responsible for notifying AT&T when you no longer meet the applicable eligibility requirements for the Program within (5) days of becoming aware of such ineliaibility.

Program Restrictions

You are eligible for Lifeline support on one phone line based at your principal residence and billed to your name. You can get Link Up benefits only once at the same address. Those benefits can only be applied toward your Activation Fee, never toward your purchase of equipment. Finally, you can't apply your Link Up benefits to any activation charges you paid prior to signing up for the Lifeline and Link Up programs.

Signing 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. Mail the completed application to:

AT&T

ATTN: Contract Services

1215 W. Cherry St.

Vermillion, SD 57069

If you cannot access the application form from http://www.wireless.att.com/about/community-support/ lifeline-link-up.jsp, just call 1-800-377-9450 and an application will be mailed to you.

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

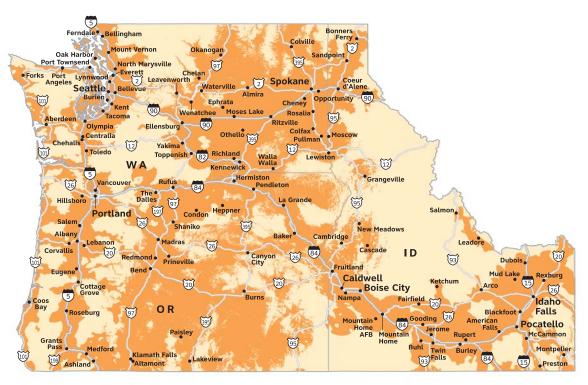


Link Up helps people who qualify for Lifeline support pay for their Activation Fee and/or any related installation charges. Link Up cost of \$36 will be waived.



Lifeline service for only \$2499* per month 300 Anytime Minutes / 1000 Night & Weekend Minutes[†] and Nationwide Long Distance Included

*Additional discounts may apply, depending on the federal and state subsidy applicable in Washington.



AT&T Coverage Area

If you still have questions or would like to receive information by mail,

please call a Lifeline Customer Service Representative at 1-800-377-9450, Monday through Friday between the hours of 10:00 a.m. - 7:00 p.m. CST. AT&T GSM handset required on Lifeline/Link Up plans. Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included or excluded in your plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from the graphics shown in the map, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber Future coverage, if depicted above, is based on current planning assumption but is subject to change and has not yet been confirmed. ¹The 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 and Link Up are available from AT&T Mobility at your principal residence, please contact a Lifeline Customer Service Representative at 1-800-377-9450.

Terms and Conditions: Lifeline and Link Up Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline and Link Up Contract. © 2010 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 07/2010

Exhibit No. (JP-41) Docket UT-121994

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Lifeline y Link Up: Washington



Servicio con descuento para clientes que reúnan los requisitos

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Lifeline.

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

Ahorra dinero con Lifeline

El servicio Lifeline cuesta sólo \$24.99 por mes, menos los descuentos que se apliquen según la asistencia federal y estatal que se ofrece en tu área. En este momento, puedes ahorrar hasta \$8.25 por mes con el descuento federal de Lifeline, e incluso más, si reúnes los requisitos para descuentos adicionales de Lifeline en tu estado.

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 telefonía móvil y pagar hasta un mínimo de **\$1**.

Requisitos para Lifeline

Los requisitos varían según el estado. Si vives en un estado que no ofrece asistencia de Lifeline, es posible que reúnas los requisitos para recibir los beneficios federales de Lifeline si los ingresos de tu grupo familiar no superan el 135% de las Normas Federales de Pobreza (Federal Poverty Guidelines o FPG, por su sigla en inglés) o si participas en uno de estos programas:

- Asistencia médica Medicaid (no Medicare)
- Cupones para alimentos (Food Stamps)
- Ingresos complementarios de seguridad (Supplemental Security Income o SSI, por su sigla en inglés)
- Asistencia pública federal para vivienda pública
- (Federal Public Housing Assistance o FPHA, por su sigla en inglés), Artículo 8
- Programa de asistencia a hogares de bajos ingresos para gastos de energía (Low Income Home Energy Assistance o LIHEAP, por su sigla en inglés)
- Programa nacional de almuerzos escolares (National
- School Lunch Program o NSLP, por su sigla en inglés)
- Asistencia temporal a familias necesitadas
- (Temporary Assistance for Needy Families o TANF, por su sigla en inglés)

Se requiere que los clientes que buscan cumplir con los requisitos para obtener los beneficios del programa bajo las normas basadas en los ingresos proporcionen 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 reguisitos anteriores o participas en uno de estos programas:

- Asistencia general de la Oficina para asuntos indígenas (Bureau of Indian Affairs o BIA, por su sigla en inalés)
- Asistencia temporal a familias necesitadas administrada a nivel tribal (Tribal Administered Temporary Assistance for Needy Families o Tribal TANF, por su sigla en inglés)
- Programa de almuerzos escolares administrado a nivel tribal (School Lunch Program o Tribal NSLP, por su
- siala en inalés) • Programa Head Start administrado a nivel tribal (con
- cumplimiento de los requisitos sobre ingresos)

Si vives en un estado que ofrece la asistencia de Lifeline. debes reunir los requisitos que se definen en el formulario

de solicitud de Lifeline y Link Up de dicho estado, que se puede consultar en http://www.wireless.att.com/about/ community-support/lifeline-link-up.jsp o al llamar al 1-800-377-9450.

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 cinco (5) días posteriores a tener conocimiento de tal inhabilitación

Restricciones del programa

Sólo se puede recibir la asistencia de Lifeline en una sola línea de teléfono, con base en tu residencia principal, facturada a tu nombre. Podrás recibir los beneficios de Link Up solamente una vez en la misma dirección. Esos beneficios se podrán aplicar solamente en el cargo de activación, nunca en la compra del equipo. Tampoco se pueden usar los beneficios de Link Up para pagar cargos de activación anteriores al momento en que te inscribiste en los programas Lifeline y Link Up.

Para inscribirte

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

AT&T

ATTN: Contract Services 1215 W. Cherry St. Vermillion, SD 57069

Si no puedes tener acceso al formulario de solicitud en http://www.wireless.att.com/about/community-support/ lifeline-link-up.jsp, llama al 1-800-377-9450 y te enviaremos uno por correo.

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

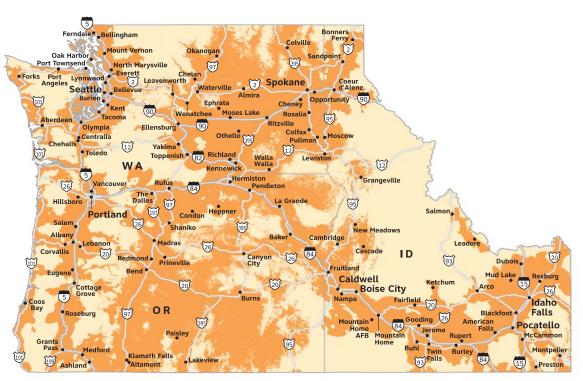
link un

El programa Link Up ayuda a las personas que cumplan con los requisitos para recibir los beneficios de Lifeline a pagar el cargo de activación o los cargos relacionados con la instalación. No se cobrará el costo de \$36 correspondiente a Link Up.



Servicio Lifeline a sólo \$2499* por mes

semana[†], y larga distancia a nivel nacional



Área de cobertura de AT&T

En caso de tener preguntas o si deseas recibir información por correo,

comunícate con un representante del servicio al cliente de Lifeline al 1-800-377-9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

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

La información que aparece en la pantalla del teléfono no indica la tarifa que se cobrará. Es importante revisar el mapa de cobertura para ver las áreas que se incluyen en el plan. El mapa muestra una aproximación de la cobertura al aire libre. El mapa puede incluir áreas en las que otras compañías 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 de donde se transmite y recibe la llamada, mas no del lugar en donde se encuentra el suscriptor. La cobertura futura, en caso de représentarse arriba, se basa en suposiciones actuales de planificación, aunque se encuentra sujeta a cambio y aún no se ha confirmado. 1Los períodos de noche y de fin de semana se extienden de 9:00 p.m. a 6:00 a.m. de lunes a viernes, y sábados y domingos durante las 24 horas. 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 internácional. El costo de roaming es de \$0.25 por minuto y los minutos de uso se descontarán de los minutos incluidos en el nlan. No se offece servicio de roamino 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 programa: gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos reguisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece los servicios de Lifeline y Link Up en el lugar de residencia principal del suscriptor, favor de comunicarse con un representante del servicio al cliente de Lifeline al 1-800-377-9450 Términos y condiciones: el servicio de Lifeline y Link Up 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 y Link Up. © 2010 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todas las otras marcas contenidas aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Actualizado: julio de 2010.

Exhibit No. (JP-41) Docket UT-121994

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de

*Es posible que se apliquen otros descuentos, según el subsidio federal y estatal correspondiente a Washington.

Exhibit G AT&T Mobility Lifeline Advertisement

Lifeline service.

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



Rethink Possible®



FREE SHIPPING | FOR QUESTIONS OR TO APPLY FOR LIFELINE SERVICE, CALL A LIFELINE CUSTOMER SERVICE REPRESENTATIVE AT 1-800-377-9450 OR VISIT WWW.WIRELESS.ATT.COM/LEARN/ARTICLES-RESOURCES/COMMUNITY-SUPPORT/LIFELINE-LINK-UP.JSP.

SERVICE AVAILABLE AT \$16.74 after Lifeline discounts are applied.

Discounts starting at \$8.25 per month.

Includes 300 Anytime minutes, nationwide long distance, and 1,000 night and weekend minutes. Link Up covers \$18 of your \$36 activation fee, and AT&T will waive the remainder.

ADDITIONAL SERVICE PLANS AVAILABLE STARTING AT \$3999 plus additional charges MINIMUM RATE PLAN INCLUDES:

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

Billing: Usage rounded up to the next full minute or kilobyte, at the end of each call or data session, for billing purposes. Screen images simulated. ©2011 AT&T Intellectual Property. Service provided by AT&T Mobility. All rights reserved. AT&T and the AT&T logo are trademarks of AT&T Intellectual Property. All other marks contained herein are the property of their respective owners.

ATM WOI 000056839 (3 Column [4.9167"] x 10" B&W) 10/3/2011 1:00:29 PM **Bellingham Herald JOB #ATM WOI P1 2265** Oct. Lifeline

Exhibit H
Lifeline Print Publications and Dates - 2011

Dates of Publication					
Publication	(Week of)	Location			
Bellingham Herald	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Skagit, Whatcom			
The Columbian/Vancouver Columbian	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Skamania, Cowlitz, Clark			
Kitsap Sun	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Jefferson, Kitsap, Mason			
Longview Daily News	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Columbia, Cowlitz, Lewis, Pacific, Wahkiakum			
Olympia Olympian	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Grays Harbor, Lewis, Mason, Thurston			
Port Townsend Leader	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Jefferson			
Seattle Times/Post Intelligencer		Benton, Chelan, Clallam, Cowlitz, Douglas, Grant,			
· •		Grays Harbor, Island, Jefferson, King, Kitsap, Kittitas,			
	2/7/11, 5/15/11,	Lewis, Mason, Okanogan, Pierce, San Juan, Skagit,			
	7/17/11, 10/16/11	Snohomish, Thurston, Whatcom, Yakima			
Spokane Spokesman-Review					
		Adams, Benewah, Bonner, Boundary, Grant, Kootenai,			
	2/7/11, 5/15/11,	Latah, Lincoln, Pend Oreille, Shoshone, Spokane,			
	7/17/11, 10/16/11	Stevens, Whitman			
Tacoma News Tribune	2/7/11, 5/15/11,	Grays Harbor, King, Kitsap, Lewis, Mason, Pierce,			
	7/17/11, 10/16/11	Thurston			
Tri-City Herald	//1//11, 10/10/11	mulston			
m-city netalu	2/7/11, 5/15/11,	Adams, Grant, Franklin, Benton, Umatilla, Walla			
	7/17/11, 10/16/11	Walla, Yakima			
Whidbey News-Times	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Island			
Yakima Herald-Republic	2/7/11, 5/15/11,				
	7/17/11, 10/16/11	Benton, Kittitas, Klickitat, Yakima			

Exhibit I AT&T Mobility Lifeline Direct Mail Postcard





Exhibit No.____(JP-41) DRethink Possible



AT&T Lifeline Service.

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

National

The affordable way to stay in touch, plus a free phone.

Qualified low-income residents may receive discounted wireless service from AT&T under the Lifeline program. Customers must meet certain eligibility criteria based on income level or current participation in financial assistance programs. For questions or to apply for Lifeline Service, call a Lifeline Customer Service Representative at **1-800-377-9450** or visit www.wireless.att.com/about/community-support/index.jsp.

Other phones are available at a discount with your Lifeline Service.

LIFELINE LINK-UP:

\$16.74 per month after discounts includes 300 Anytime Minutes, 1,000 Night and Weekend Minutes.

Call 1-800-377-9450 or log on to www.wireless.att.com/about/community-support/index.jsp



PRSRT STD U.S. POSTAGE PAID AT&T

Offers available while supplies last. Regarding equipment offered substitutions may apply. For specific information regarding the terms and conditions of the rate plan, please refer to the Lifeline rate plan brochure and the Lifeline and Link-Up service applications at http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp. "Roaming" and other charges may apply. Clients and applicants of the Lifeline service must meet certain criteria based on their income and/or their current participation in certain programs of economic assistance. Certain restrictions apply. ©2011 AT&T Intellectual Property. All rights reserved. AT&T and the AT&T logo are trademarks of AT&T Intellectual Property. All other marks contained herein are the property of their respective owners.

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Exhibit J Annual Plan for Universal Service Support Expenditures for January 1, 2013 through December 31, 2013¹⁰

AT&T Mobility's projected receipt of federal high cost support in 2013 under the current federal rules is **REDACTED** for its entire ETC designated area in Washington. This amount includes the reduction in federal high cost support for CETCs.

In general the capital expenditures listed below increase the coverage, capacity, and reliability of AT&T Mobility's network in its ETC designated area in Washington.

Item	Description	Planned Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
Total		REDACTED

¹⁰ AT&T Mobility understands that the Washington rule only requires it to provide planned expenditure information through September 30, 2012; however, AT&T Mobility's plans are on a calendar year basis.

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Exhibit K Map

Cell sites as of End of Year 2011, Projected End of Year 2012, and Projected End of Year 2013

REDACTED