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July 30, 2012

By Electronic Mail and Overnight Mail

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

RE: 2012 ETC Certification - AT&T Mobility

Dear Mr. Danner:

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 and WAC 480-123-070, 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 Exhibits B – E, J and K. 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: Exhibits B, E, J and K which reflect in granular detail the status of the network improvements AT&T Mobility has undertaken for calendar year 2011 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 2013; Exhibit C contains detailed information regarding network outages experienced during the calendar year 2011; Exhibit D contains detailed customer complaint information; and, Exhibit E contains detailed information about the status of AT&T's backup power augmentation project.

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, marketing strategies 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.

AT&T Mobility's report of outages in Exhibit C is also highly proprietary and its disclosure could cause competitive harm to the company as well as providing information that would reveal or otherwise identify potential weakness in the telecommunications system that could be taken advantage of. If a competitor accessed information regarding the number and duration of the company's outages, and the company's response to outages, the competitor could gain an enhanced understanding of the competitor's infrastructure and technology, including its relatively strong and weak points. Further, similar outage information is afforded confidential protection by the FCC pursuant to 47 C.F.R. §4.2 for a number of reasons including those regarding security of the telecommunications network.

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

Sincerely,


Sharon Mullin by JLD w/permission

Enclosures