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July 31, 2013

# 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:** 2013 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 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 - L. The unredacted confidential documents have been printed on yellow paper, 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, J - L which reflect in granular detail the status of the network improvements AT&T Mobility has undertaken for calendar year 2012 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 2014; Exhibit D contains information about customer location; and, Exhibit E contains detailed customer complaint information.

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.

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 AT&T Mobility'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,

Tharm Mullin

**Enclosures** 

# AT&T Mobility (SAC 529910) Annual Eligible Telecommunications Carrier Report for 2012 and 2014 Annual Plan

AT&T Mobility, study area code ("SAC") 529910, submits its Annual Eligible Telecommunications Carrier Report for 2012 ("2012 Report") and Annual Plan for 2014 in accordance with the rules that apply to Eligible Telecommunications Carriers ("ETCs").

# I. AT&T MOBILITY ETC REPORT FOR 2012

# A. Annual Certification of Eligible Telecommunications Carriers

With this filing AT&T Mobility is requesting continued certification as an ETC in Washington. In accordance with WAC 480-123-060 and 47 CFR §54.314, AT&T Mobility provides a certification in **Exhibit A** that all federal universal service support was used in the preceding calendar year (2012) and will be used in the coming calendar year (2014) 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 2012

# 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's local service outage report for calendar year 2012 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

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<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, 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).

<sup>&</sup>lt;sup>2</sup> As AT&T Mobility plans its capital expenditures on a calendar year basis, it has reported in this manner for its 2012 Report and 2014 Annual Plan.

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 rule 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 one (1) unfulfilled request for service in calendar year 2012. 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. The details of the unfulfilled request for service is attached hereto as **Confidential Exhibit D**.

AT&T Mobility has committed to provide service throughout its proposed designated service area to all customers making a reasonable request for service. AT&T Mobility provides service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises; and provides service within a reasonable period of time, if the potential customer is within the applicant's licensed service area but outside its existing network coverage. AT&T Mobility has determined that this unfulfilled request for service cannot be provided at reasonable cost by:

- (1) Modifying or replacing the requesting customer's equipment;
- (2) Deploying a roof-mounted antenna or other equipment;
- (3) Adjusting the nearest cell tower;
- (4) Adjusting network or customer facilities;
- (5) Reselling services from another carrier's facilities to provide service; or
- (6) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

# 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 **Confidential Exhibit E**. This exhibit also generally describes the nature of the complaint and AT&T Mobility's efforts to resolve the matter.

# 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 2012, AT&T 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) 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 backup power at all cell sites, AT&T Mobility has received several extensions for compliance with this requirement.<sup>3</sup> As of July 31, 2012, AT&T Mobility has installed backup power at all of its cell sites.<sup>4</sup> Included in **Exhibit A** is AT&T Mobility's certification of substantial compliance with this requirement.

# 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 2012 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;

<sup>&</sup>lt;sup>3</sup> Docket UT-063060, Order 01 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). In Order 02, the Commission granted AT&T Mobility a one-year extension for three cell sites<sup>3</sup> that did not meet the February 15, 2009 deadline; the upgrades were subsequently completed. In Order 02 the Commission also required that all of AT&T Mobility's cell sites within its ETC designated area must meet the 4-hour back-up power requirement by July 1, 2012. In Order 04, the Commission granted AT&T Mobility's request for a temporary extension for two cell sites. AT&T Mobility, however, did not need this further extension for two cell sites and in its ETC Annual Report filed in July 2012, Confidential Exhibit E states that "AT&T has installed backup power at all of its cell sites within its ETC designated area."

<sup>&</sup>lt;sup>4</sup> Cell site" is not defined in the Commission's regulations. AT&T Mobility interprets the term "cell site" as excluding distributed antenna systems ("DAS") or similar systems which generally have a different character and use than a "traditional" cell site which has antennas mounted on a cell tower or monopole or the side of or roof of a building. The DAS may be owned by someone other than AT&T Mobility such that AT&T Mobility cannot install backup power. Generally speaking, a DAS is a system of spatially separated antennas connected via cables (i.e., coaxial or fiber optic cable) to a signal source, such as a base station or an external antenna capable of communicating with a base station wireless. DAS are used to distribute wireless signals through large structures such as office buildings, hospitals, hotels, arenas, and tunnels where the signal coverage from the "traditional" cell sites is lacking, to increase the capacity of the wireless system, or to provide service in an area that does not allow a traditional cell site. AT&T Mobility also believes the term "cell site" excludes repeaters. A repeater is a device used for boosting the cell phone reception to the local area by the usage of a reception antenna, a signal amplifier and an internal rebroadcast antenna and is usually intended for use in one building.

- Offered Lifeline brochures in English and Spanish with information about the company's Lifeline and Link Up offering, including pricing information and eligibility criteria. **Exhibit F** is an example of AT&T Mobility's Lifeline brochure available in 2012 for tribal and non-tribal areas;<sup>5</sup>
- Maintained a dedicated Lifeline website with information about Lifeline Service along with an application www.att.com/mobility-lifeline;
- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, an example of AT&T Mobility's Lifeline advertisement for 2012 is included in <u>Exhibit</u>
   <u>G. Exhibit H</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. <u>Exhibit I</u> is
  the postcard used for this direct mail campaign;
- AT&T Mobility contacted various social service agencies/groups about its Lifeline Service; and,
- AT&T Mobility 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

<u>Confidential Exhibit J</u> contains AT&T Mobility's projected receipt of federal high cost support in 2014 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, 2014 through December 30, 2014.<sup>6</sup>

The anticipated federal high cost support was calculated by reviewing the USAC projections. 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 2014. 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 2014, 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 2012 and projected cell site locations for 2014.

<sup>&</sup>lt;sup>5</sup> 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.

<sup>&</sup>lt;sup>6</sup> 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 2014.

As required by 480-123-080(3), AT&T Mobility is also filing as  $\underline{\textbf{Confidential Exhibit L}}$  a disc containing a map in .shp format that shows the general location where it provides commercial mobile radio service signals. This information is required to be filed every three (3) years.

# Exhibit A

# Certification

# **Exhibit A**

# AT&T MOBILITY LLC ANNUAL CERTIFICATION July 2013

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:

- 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<sup>1</sup> 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 2012 and will be used in 2014 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 2012, 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 2012, 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);
- 5. During calendar year 2012, AT&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 04 regarding the installation of backup power at its cell sites<sup>3</sup> and as

<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.

<sup>&</sup>lt;sup>3</sup> Cell site" is not defined in the Commission's regulations. AT&T Mobility interprets the term "cell site" as excluding distributed antenna systems ("DAS") or similar systems which generally have a different character and use than a "traditional" cell site which has antennas mounted on a cell tower or monopole or the side of or roof of a

further described in the AT&T Mobility Annual ETC Report for 2012 and 2014 Annual Plan; and,

6. During calendar year 2012, 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

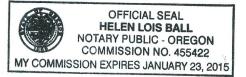
Vice President/General Manager

Pacific Northwest Market

July 30, 2013

Subscribed and sworn to before me this 30th day of July, 2013

Notary Public



building. The DAS may be owned by someone other than AT&T Mobility such that AT&T Mobility cannot install backup power. Generally speaking, a DAS is a system of spatially separated antennas connected via cables (i.e., coaxial or fiber optic cable) to a signal source, such as a base station or an external antenna capable of communicating with a base station wireless. DAS are used to distribute wireless signals through large structures such as office buildings, hospitals, hotels, arenas, and tunnels where the signal coverage from the "traditional" cell sites is lacking, to increase the capacity of the wireless system, or to provide service in an area that does not allow a traditional cell site. AT&T Mobility also believes the term "cell site" excludes repeaters. A repeater is a device used for boosting the cell phone reception to the local area by the usage of a reception antenna, a signal amplifier and an internal rebroadcast antenna and is usually intended for use in one building.

# Exhibit B AT&T Mobility Use of ETC Support in 2012

AT&T Mobility received **REDACTED** in federal high cost support for the calendar year 2012 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	2012 Actual	2012 Actual Amount
REDACTED	REDACTED	REDACTED
Total		REDACTED

# Exhibit C 2012 Outage Report

# REDACTED

# CONFIDENTIAL PER WAC 480-07-160 Exhibit D

# 2012 Unfulfilled Requests for Service

# ADDRESS: REDACTED

Customer does not have coverage at residence due to the radio signal being blocked by terrain (hillside). As the customer is in an ETC designated area, AT&T Mobility conducted an evaluation to determine whether it could reasonably fulfill the customer's service request.

# Evaluation:

- A.) Modify or replace the customer's equipment.
  - This is unlikely a handset issue. The issue occurs at the customer's primary residential/business address (not during travel). Based on current coverage map, there is no coverage at customer's location.
- 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.
  - AT&T will keep this request in mind when conducting its long term site planning. AT&T does not have a new site in its 2013 build plan that will improve coverage at this location.

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

# Exhibit E 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 2012. 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 of 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.

**REDACTED** 

# Exhibit F AT&T Mobility Lifeline Brochure



for aualified customers

Discounted service

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 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.

Vertices bit to as little as \$2.

Qualifying for Lifeline

Lifeline is a federal benefit and wiltfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the statement of the

- 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.

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 Powerty guidelines 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 state, federal or Tribal program. 2, another letter of participation in a qualifying state, federal or Tribal program. 3, Map amp participation documents, for program. 3, You pamp participation in documents, for program. 3, You pamp participation in a qualifying state, federal or Tribal program. Income eligibility. Prior Year's state, federal or Tribal program. Income eligibility. Prior Year's state, federal or Tribal program. Income eligibility. Prior Year's state, federal or Tribal streture, current income statement from an employer or paycheck. Social Security statement of benefits. Retirement/pension statement of benefits. The program of the program of

# Signing Up

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 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.



# Lifeline service for only \$1574 per month

300 Anytime Minutes / 1000 Night & Weekend Minutes<sup>†</sup> and Nationwide Long Distance Included



AT&T Coverage Area

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 plans.





Servicio con descuento para clientes que reúnan los requisitos

RTP BR T 1012 3659 D-Sa/b WAS

# Lifeline

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.

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

Requisitos para Lifeline

Uteline es un beneficio federal y realizar declaraciones falsas

voluntafiamente para obtenetró puede resultar en muttas, práción,

cancelación de la inscripción o prohibición para volver a inscribrise en

el programa. Solo se ofrece on servición de Lifeline por guyo familiar.

Lifeline, cualquier persona o grupo de personas que viem juritas en

na misma directión y compartan ingresos y agistos. Un solo grupo

familiar no podrá recibir beneficios Lifeline de varios proveedores. Livel

solo acida de este timite constitty en un incumplimiento del reglamento

de la Comisión Federal de Comunicaciones (FCC) y se cancelará la

inscripción del suscriptor en el programa. Lifeline es un heneficio

no transferible y el suscriptor no podrá transferión a ninguna otra

persona. Es posible que tengas derecha a recibir los beneficios

federales de Lifeline si los ingresos de tu grupo bamiliar son iguales

o inferiores a un 13% de la normas federals de potenza (FPC, pos

su sigla en niglei, o si participas en uno de estes programas.

- Assistencia medica reflección en Medicare)

- Porgama compliementario de assiencia nutriciore. Porgama, SNAP, o cupones

de inmentiol

- Ingresos compliementarios de seguridad (Supplemental Security

- Ingresos complementarios de seguridad (Supplemental Security Income o SSI)
- Asistencia federal para vivienda pública (Federal Public Housing Assistance o FPHA), Sección 8
- Programa de sistencia a hogares de bajos ingresos para gastos de energía (Low Income Home Energy Assistance Program a nacional de almuerzos escolares (National School Lunch Program a no NSLP)

Programa nacional de almuerzos escolares (Notional School Lunch Program o NSLP)
 Asistencia temporal a familias necesitadas (Temporary Assistance for Needy Familias o 7ANF)
 Los clientes que buscan cumpilir con los requisitos para obtener los heneficios el programa bajo las nomas basadas en los ingresos heneficios el programa bajo las nomas basadas en los ingresos de su supus familia
 Sivien en tentrolos trabales, también podrás recebir los heneficios de Enhanced Lifeline si cumples con los requisitos anteriores o participas en uno de estos programas.
 Asistencia general de la Oficina para asuntos indigenas (Buerou di findim Afrisos Ball).
 Asistencia temporal a familias necesitadas administrada a nivel tribal (Trabal Administered Famorary Assistance for Neely Families o Tribal TANF)
 Head Stort administrada a nivel tribal (con cumplimiento de los

- Head Start administrado a nivel tribal (con cumplimiento de los requisitos sobre ingresos)

Programa de distribución de alimentos en reservas indigenas (Food Distribution Program on Indian Reservations o FDPR) Importante el cilente 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) diss 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.

grupo familiar.

Formularios de documentación requerida para inscribirse: todos los suscriptores deberán demostrar que cumplen con los requisitos basindose por lo menos en (11) que los ingraesos del grupo familiar begin la cuntidar de integrantes) son iguales o interiores a un esta de la cuntidar de integrantes) son iguales o interiores a un esta de la cuntidar de integrantes) son iguales o interiores a un esta de la cuntidar de integrantes de assistencia federal.

1. Declaración actual o del año anterior de los beneficios que recibie de un programa calificado estatal, deried a totala. 2. Decumentos que prueber la participación en un programa calificado estatal, federal o tribal. 3. Decumentos que prueber la participación en un programa calificado estatal, federal o tribal. 4. Often de la compositor de la participación en un programa calificado estatal, federal o tribal. 3. Decumentos que prueber la participación en un programa calificado estatal, federal o tribal de la final participación en la programa calificado estatal, federal o tribal de la dispersión de la cumente de la compositor de la Formularios de documentación requerida para inscribirse: todos los

# Para inscribirte

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

Si no puedes tener acceso al formulario de solicitud desde http://www.att.com/mobility-lifeline, llama al 1-800-377-9450 y te enviaremos una solicitud por correo.

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

# Servicio Lifeline por sólo \$1574 al mes

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana<sup>†</sup>, y larga distancia a nivel nacional



comunicate 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 se requiere un teléfono GSM de AT&T.

cliente de Libbrie al 3-800-317-3450.

Terminos y condidones e sirvacio de Libria está sujato a los términos y condiciones que aparecen en los términos de servicio, al plan de tarfas, la información de venta y en el contrato de Libria.

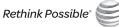
O 2012 ARTI fedilectual Proporty. Todos los derectos reservados. ARTI, el logotipo de ARTI y todos las cirtos marcas contendas aquí son marcas comerciales de ARTI Intellectual Proporty y/o companiles
altitudicional Sation. Asticulados plado de 2012.



# Exhibit G AT&T Mobility Lifeline Advertisement

Lifeline service from AT&T Mobility.





FREE SHIPPING | FOR QUESTIONS OR TO APPLY FOR LIFELINE SERVICE, CALL A LIFELINE CUSTOMER SERVICE REPRESENTATIVE AT 1-800-377-9450 OR VISIT WWW.ATT.COM/MOBILITY-LIFELINE.

# SERVICE AVAILABLE AT \$15.74 after Lifeline discounts are applied.

Discounts starting at \$9.25 per month.

Includes 300 Anytime minutes, nationwide long distance, and 1,000 night and weekend minutes.

# ADDITIONAL SERVICE PLANS AVAILABLE STARTING AT $^{\$}39^{99}_{\text{plus}}$ 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 "0" for operator assistance to complete a call

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 willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. 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 Level guidelines 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. 3: Program participation documents (e.g., consumer 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/Workers' Compensation 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. AT&T Mobility will NOT retain a copy of this documentation. 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. All marks used herein are the property of their respective owners. © 2012 AT&T Intellectual Property.

Exhibit H
Lifeline Print Publications and Dates – 2012

Insertion Date	Publication
02/28/2012	Bellingham Herald
05/15/2012	Bellingham Herald
08/07/2012	Bellingham Herald
11/06/2012	Bellingham Herald
02/28/2012	Kitsap Sun
05/15/2012	Kitsap Sun
08/07/2012	Kitsap Sun
11/06/2012	Kitsap Sun
02/28/2012	Longview Daily News
05/15/2012	Longview Daily News
08/07/2012	Longview Daily News
11/06/2012	Longview Daily News
02/28/2012	Olympia Olympian
05/15/2012	Olympia Olympian
08/07/2012	Olympia Olympian
11/06/2012	Olympia Olympian
02/29/2012	Port Townsend Leader
05/16/2012	Port Townsend Leader
08/08/2012	Port Townsend Leader
11/07/2012	Port Townsend Leader
02/28/2012	Seattle Times/Post Intelligencer
05/15/2012	Seattle Times/Post Intelligencer
08/07/2012	Seattle Times/Post Intelligencer
11/06/2012	Seattle Times/Post Intelligencer
02/28/2012	Spokane Spokesman-Review
05/15/2012	Spokane Spokesman-Review
08/07/2012	Spokane Spokesman-Review
11/06/2012	Spokane Spokesman-Review
02/28/2012	Tri-City Herald
05/15/2012	Tri-City Herald
08/07/2012	Tri-City Herald
11/06/2012	Tri-City Herald
03/03/2012	Whidbey News-Times
05/19/2012	Whidbey News-Times
08/11/2012	Whidbey News-Times
11/10/2012	Whidbey News-Times
02/28/2012	Yakima Herald-Republic
05/15/2012	Yakima Herald-Republic

08/07/2012	Yakima Herald-Republic
11/06/2012	Yakima Herald-Republic
02/28/2012	The Columbian
05/15/2012	The Columbian
08/07/2012	The Columbian
11/06/2012	The Columbian
02/28/2012	Tacoma News Tribune
05/15/2012	Tacoma News Tribune
08/07/2012	Tacoma News Tribune
11/06/2012	Tacoma News Tribune

# Exhibit I AT&T Mobility Lifeline Direct Mail Postcard



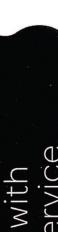
# AT&T Mobility Lifeline Service

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

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 consisting







# AT&T Mobility Lifeline Service

Weekend Minutes, including Nationwide long distance. includes 300 Anytime Minutes and 1,000 Night and \$15.74 per month after discount of \$9.25. The plan

att.com/mobility-lifeline ••••• For more information call 1-800-377-9450 or visit

Qualified low-income residents may receive discounted wireless service from AT&T Mobility under the Lifeline program. Lifeline is a government one discount per household. Customers must meet certain eligibility consumers may enroll in the program, and the program is limited to assistance program; the service is non-transferable, only eligible criteria based on income level or current participation in financial assistance programs.

Oklahoma City, OK 73134 14201 Wireless Way

Anne Bornholdt

Printed on recycled paper. Please recycle. 🏵

Call today to find out which phones are available at a discount with AT&T Mobility Lifeline Service. 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 service applications at <a href="http://latt.com/mobility-lifeline">http://latt.com/mobility-lifeline</a>. 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 documentation necessary for enrollment. All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household for that size, OR (2) the household income at or below 135% of Fed Poverty guidelines for a household for that size, OR (2) the household income at or below 135% of Fed Poverty guidelines for a household for that size, OR (2) the household income and of the federal assistance programs. 1 - current or prior year's statement of benefits, federal or Tribal programs. 2 - a notice letter of participation in a qualifying state, federal or Tribal programs. SNAP card, Medicaid card, or copy thereof). 4 - other official document evidencing the consumer's statement for benefits. Premapleyment of benefits. Reference and penetral statement of benefits. Benefit or prior part for an employer or paycheek. Social Security statement of benefits. Veterans Administration statement of benefits. Tederal or Tribal motive 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. AT&T Mobility will NOT retain a copy of this documentation. ©2012 AT&T Intellectual Property. All other marks contained entering the property of their respective owners.







# $\begin{array}{c} \textbf{Exhibit J} \\ \textbf{Annual Plan for Universal Service Support Expenditures for January 1, 2014} \\ \textbf{through December 31, 2014}^7 \end{array}$

AT&T Mobility's projected receipt of federal high cost support in 2014 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	2014 Plan	2014 Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
KEDITO ILD	KEDIKETED	REDITCIED
Totals		REDACTED

16

<sup>&</sup>lt;sup>7</sup> 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.

Exhibit K
Map
Cell sites as of End of Year 2012, Projected End of Year 2013, and Projected End of Year 2014

REDACTED

# Exhibit L

Disc containing a map in .shp format that shows the general location where it provides commercial mobile radio service signals.

This information is required to be filed every three (3) years.

# REDACTED

The disc is provided as confidential per WAC 480-07-160.