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June 28, 2019

Via Electronic Mail and Overnight Mail

Mark Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

RE: 2019 ETC Certification - AT&T Mobility

Dear Mr. Johnson:

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 and Exhibit H. The unredacted confidential documents for Exhibits B – D and H are being filed electronically as Confidential and are 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 2018 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 2020; Exhibit C contains information about customer outages; and Exhibit D contains customer complaint information by type of complaint that is not generally disclosed to the public. Exhibit H contains detailed confidential information about AT&T Mobility's coverage in Washington as required by WAC 480-123-080(3). This information is required to be filed every three (3) years and was last provided on June 29, 2016. Due to size, the file is being provided in overnight mail via CD-ROM format. The information on the CD-ROM is not available to the public in this format.

Mr. Johnson June 28, 2019 Page Two

AT&T Mobility believes that all 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.

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

Sincerely,

Sharon Mullin

Tharm Mullin

Enclosures

AT&T Mobility (SAC 529910) Annual Eligible Telecommunications

Carrier Report for 2018 and 2020 Annual Plan

AT&T Mobility, study area code ("SAC") 529910,¹ submits its Annual Eligible Telecommunications Carrier Report for 2018 ("2018 Report") and Annual Plan for 2020 in accordance with WAC 480-123-060 to WAC 480-123-080.

I. AT&T MOBILITY ETC REPORT FOR 2018

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 high-cost universal service support was used in the preceding calendar year (2018) and will be used in the coming calendar year (2020) 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 2018

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))

Local service outage information as required by WAC 480-123-070(2) is contained in **Confidential Exhibit C**.

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

AT&T Mobility had no (0) unfulfilled requests for service in calendar year 2018.

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

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, Ocket 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).

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 2018, 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) 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 macro 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 2018, 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 filed with the FCC and the Commission as Exhibit - 610-2018 CTIA BC-DRP Compliance.

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 2018 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 2018;
- Maintained a dedicated Lifeline website with information about Lifeline Service (att.com/wirelesslifeline)
- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, an example of AT&T Mobility's Lifeline advertisement for 2018 is included in <u>Exhibit F</u>.
 Exhibit F also 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 low-income households. <u>Exhibit G</u> is the postcard used in
 2018.

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 2020 and its plans to utilize such support. 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 reduction in federal high cost support was suspended. The FCC will commence the phase down in legacy competitive ETC high-cost support when it announces Mobility Fund Phase II winning bidders.

III. Map as required by WAC 480-123-080(3)

Confidential Exhibit H contains the coverage information in .shp format as required in WAC 480-123-080(3). Per the Commission's rules, AT&T Mobility is required to provide this information every 3 years; AT&T Mobility last filed this information on June 29, 2016.

Exhibit A

AT&T MOBILITY LLC ANNUAL CERTIFICATION 2018

I, Morgan L Collins, being of lawful age and duly sworn, state that I serve as Vice President and General Manager for the Pacific Northwest and Hawaii for AT&T Mobility Corporation which manages New Cingular Wireless PCS, LLC (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:

- 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
- Federal universal service support received by AT&T Mobility was used in 2018 and will be used in 2020 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 2018, 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;
- During calendar year 2018, 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 2018, 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 2018 and 2020 Annual Plan; and,

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, Order Granting Petition for Designation as an Eligible Telecommunications Carrier, 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). 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 2018, 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).

Morgan L. Collins

Vice President/General Manager Pacific Northwest and Hawaii

June 25, 2019

Subscribed and sworn to before me this <u>25</u> day of June, 2019

Notary Public

STACY CLARK Notary Public State of Washington License Number 178139 My Commission Expires May 27, 2023

Exhibit B

AT&T Mobility Use of ETC Support in 2018 and 2020

Exhibit B - Report on Use of 2018 Federal High Cost Support

ILEC Study Area (list every study area)	Wire Center CLLI (list every wire center)	Wire Center Name	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	2018 Expense (utilities, Lease, Interconnect)	Capital and Expense investment for 2018

2018 Total Disbursement from High Cost Support

Customer Benefit (2018):

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 B - Report on Use of 2020 Federal High Cost Support

ILEC Study	William Country Old I				Bustantant		0000 5	
Area (list	Wire Center CLLI				Projected		2020 Expense	
every study	(list every wire		Project (e.g. cell site, radio, cabinets, etc.) or if no	Projected Start	Completion		(Utilities, Lease,	Capital and Expense
area)	center)	Wire Center Name	project for the W/C provide reason why	Date	Date	Capital Investment	Interconnect)	investment for 2020
, and the second	,		,			•	,	

Customer Benefit (2020):

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

REDACTED Per WAC 480-07-160 Exhibit C

AT&T Mobility Local Service Outages for 2018

REDACTED Per WAC 480-07-160 Exhibit C - 2018 Outage Report

											1			
Outage Start Date		Outage End Date	Outage End Time	Number of Customers Affected	911 facilities Affected (Yes/No)	Service Outage Description - Wireline (including cable) VOIP (Yes/No)	Service Outage Description - Wireline (including cable) Voice (Non VOIP) (Yes/No)	Service Outage Description - Cellular (Yes/No)	Service Outage Description - Voice over LTE (VoLTE) (Yes/No)	Service Outage Description - 911, E911 or NG911 Services Only (Yes/No)		Did this outage affect multiple Study Areas (Yes/No)	Service Outage Resolution	Preventative Procedures
5/18/2018	6:28 AM													
5/24/2018	4:36 AM													
5/24/2018	5:26 AM													
5/29/2018	8:10 PM													
6/6/2018	5:14 AM													
6/6/2018	1:15 PM													
6/7/2018	2:07 PM													
6/8/2018	12:13 PM													
6/15/2018	5-21 004													
0/13/2018	J.ZI AIVI													
6/20/2018	10:41 PM													

REDACTED Per WAC 480-07-160 Exhibit C - 2018 Outage Report

Outage Start Date		Outage End Date	Outage End Time	Number of Customers Affected	911 facilities Affected (Yes/No)	Service Outage Description - Wireline (including cable) VOIP (Yes/No)	Service Outage Description - Wireline (including cable) Voice (Non VOIP) (Yes/No)	Service Outage Description - Cellular (Yes/No)	Service Outage Description - Voice over LTE (VoLTE) (Yes/No)	Service Outage Description - 911, E911 or NG911 Services Only (Yes/No)	Did this outage affect multiple Study Areas (Yes/No)	Service Outage Resolution	Preventative Procedures
7/9/2018	9:18 PM												
8/8/2018	6:33 AM												
8/23/2018	10:01 AM												
9/24/2018	6:26 AM												
10/15/2018	3:09 PM												
10/19/2018	8:56 PM												
10/31/2018	7:18 PM												
11/19/2018	4:28 AM												

REDACTED Per WAC 480-07-160 Exhibit C - 2018 Outage Report

Outage Start Date	Outage Start Time	Outage End Date	Outage	Number of Customers Affected	911 facilities Affected (Yes/No)	Service Outage Description - Wireline (including cable) VOIP (Yes/No)	Service Outage Description - Wireline (including cable) Voice (Non VOIP) (Yes/No)	Service Outage Description - Cellular (Yes/No)	Service Outage Description - Voice over LTE (VoLTE) (Yes/No)	Service Outage Description - 911, E911 or NG911 Services Only (Yes/No)	Service Outage Description - Other (Enter up to 50 characters of text)	Did this outage affect multiple Study Areas (Yes/No)	Service Outage Resolution	Preventative Procedures
11/26/2018	5:22 PM													
12/6/2018	3:50 AM													
12/14/2018	2:02 AM													
12/16/2018	12:29 PM													
12/20/2018	5:56 PM													
12/27/2018	10:04 PM													

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 2018. Specifically, complaints were filed by AT&T
Mobility customers in Washington with the FCC or approximately complaints per 1,000
customers. AT&T Mobility customers in Washington filed complaints with the office of the attorney
general (WA AG) of Washington or 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	FCC	WA AG	Total							
Charges & Fees (Billing)										
Hardware/Service Orders/Account Changes										
Other (Misc)										
Technical Issues (Network)										
Offers, Promotions, Adjustments (Point of Sale)										
Total										

Exhibit E

AT&T Mobility Lifeline Brochure





Discounted service for qualified customers

Washington

Lifeline

Lifetine service is just \$24.99 a month, which is then discounted by \$9.25 to reduce your monthly charge to \$15.74.

Qualified residents of Tribal Lands can get Enhanced Lifeline support, which can reduce your wheless bill to as little as \$1.

- Tribal Administer of Temporary Assistance for Needy Families (Tribal TANF)
 Tribal Administered Head Start (meeting income qualitying standards)
 Evol Olistic Head Start (meeting income
- Food Distribution Program on Indian Reservations (FDPR)

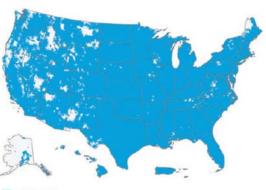
AT&T ATTN: Contract Services PO Box 2377 Jacksonville, Texas 75766

Jacksonville, Texas rareif you cannot access the application form from att.com/mobility-lifeline, just call 900.377,9450 and an application will be mailed to you.



Lifeline service for only \$1574 per month

1,000 Anytime Minutes / 1,000 Night & Weekend Minutes¹ and Nationwide Long Distance included



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Servicio Lifeline por solo \$1574 al mes Incluye 1,000 Minutos a Cualquier Hora, 1,000 Minutos de Noche y de Fin de Semanat y Larga Distancia a Nivel Nacional





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Lifeline

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- -Asstencia Tempora i a Familias Necesitadas Administrada a Nivel Tribal (TANF Tribal) -Head Start Administrada a Nivel Tribal (con cumplimiento de los requisitos sobre Ingresos)
- Programa de Distribución de Almentos en Reservas indígenas (Faxod Distribution Program an Indian Reservations o FDPR)

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Proses 75766
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con un Representante de Servicio al Cliente de Lifeline al **900.377.9450**, ernes de 10.00 a.m. a 7.00 p.m. (hora central).

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Washington

Exhibit F

AT&T Mobility Lifeline Advertisement (with Publications and Dates)

Washington (WOI)

Promo Launch Date: 3/14/2018

- · Auburn Reporter
- · Bellingham Herald
- · Aberdeen Daily World
- Kitsap Sun
- · Longview Daily News
- · Olympia Olympian
- · Port Townsend Leader
- Rawhide Press
- Seattle Times
- · Sequim Gazette
- Spokane Spokesman-Review
- · Tacoma News Tribune
- · The Chronicle
- · Tri-City Herald
- · Whidbey News Times
- · Yakima Herald-Republic

Washington (WOI)

Promo Launch Date: 6/20/2018

- · Aberdeen Daily World
- Auburn Reporter
- · Bellingham Herald
- Kitsap Sun
- · Longview Daily News
- · Olympia Olympian
- · Port Townsend Leader
- · Rawhide Press
- Seattle Times
- Sequim Gazette
- Spokane Spokesman-Review
- · Tacoma News Tribune
- · The Chronicle
- · Tri-City Herald
- · Whidbey News Times
- · Yakima Herald-Republic



FREE SHIPPING | FOR QUESTIONS OR TO APPLY FOR LIFELINE SERVICE, CALL A LIFELINE CUSTOMER SERVICE REPRESENTATIVE AT 1-800-377-945 OR VISIT ATT.COM/MOBILITY-LIFELINE.

SERVICE AVAILABLE AT \$15.74 the Lifete docume an applicable to 1000 Anytime minutes, nationalide long distance, and 1000 right and weekend minutes.

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CALL A LIFELINE CUSTOMER SERVICE REPRESENTATIVE AT 1-800-377-9450
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SERVICE AVAILABLE AT \$15.74 the three documes a space includes 1,000 Anytime minutes, nationaride long distance, and 1,000 raight and weekand remates.

If you live on Tribal lands and qualify, you could get Enhanced Lifeline support,

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Exhibit F (continued)

AT&T Mobility Lifeline Advertisement (with Publications and Dates)

Washington (WOI)

Promo Launch Date: 11/13/2018

- · Aberdeen Daily World
- The Chronicle



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Washington (WOI)

Promo Launch Date: 11/14/2018

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- · Kitsap Sun
- Longview Daily News
- · Olympia Olympian
- Port Townsend Leader
- Seattle Times
- Sequim Gazette
- Spokane Spokesman-Review
- Tacoma News Tribune
- Tri-City Herald
- Whidbey News Times
- Yakima Herald-Republic



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Exhibit F (continued)

AT&T Mobility Lifeline Advertisement (with Publications and Dates)

Washington (WOI)

Promo Launch Date: 11/16/2018

Auburn Reporter



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Washington (WOI)

Promo Launch Date: 12/14/2018

Rawhide Press



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Exhibit G

AT&T Mobility Lifeline Direct Mail Postcard



AT&T Mobility Lifeline Service*

Representantes bilingües disponibles. Llama ahora al 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 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.



Get a phone with affordable service

AT&T Mobility Lifeline Service

Plans start at \$12.24 after discount (excluding taxes, fees and surcharges) for qualified recipients.



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 800.377.9450 or visit www.att.com/mobility-lifeline.

Call or email today to find out which phones are available at a discount with AT&T Mobility Lifeline Service.





For more information, call 800.377.9450.

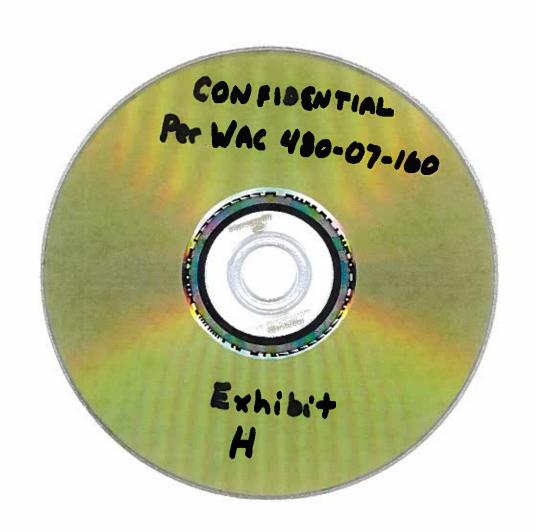
SID ALLARD 7850 N BELT LINE RD FL 6 IRVING, TX 75063-6062 վուկուդիդիդիկուսվիոնդիկուկիկիկիդիկիկ

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