

**Before the
Washington Utilities and Transportation Commission**

In the Matter of Amending the)	Docket UT-043011
Designation of NEW CINGULAR)	
WIRELESS PCS, LLC; BELLINGHAM)	
CELLULAR PARTNERSHIP;)	
BREMERTON CELLULAR)	PETITION TO AMEND THE
TELEPHONE COMPANY; HOOD)	DESIGNATION
RIVER CELLULAR TELEPHONE)	AS AN ELIGIBLE
COMPANY, INC; and, OLYMPIC)	TELECOMMUNICATIONS
CELLULAR TELEPHONE COMPANY)	CARRIER
INC. d/b/a AT&T MOBILITY to amend)	
its designation as an Eligible)	
Telecommunications Carrier to include)	
those areas previously owned by RCC)	
of Minnesota)	

**VERIFIED PETITION OF AT&T MOBILITY TO AMEND ITS DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

New Cingular Wireless PCS, LLC; Bellingham Cellular Partnership; Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company; and, Olympia Cellular Telephone Company, subsidiaries of AT&T Mobility LLC d/b/a AT&T Mobility (herein after referred to as "AT&T Mobility") respectfully request that the Washington Utilities and Transportation Commission ("Commission") amend the eligible telecommunications carrier ("ETC") designation that it previously obtained pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended ("Act") to reflect AT&T Mobility's acquisition of RCC of Minnesota assets in Washington RSA 2 and RSA 3 and to include these areas in AT&T Mobility's ETC designation.

I. Background

1. On April 13, 2004, the Commission in Docket No. UT-043011 granted the request of AT&T Wireless PCS of Cleveland, LLC, AT&T Wireless Services of Washington, LLC, Spokane Cellular Telephone Company, Yakima Cellular Telephone Company, Bremerton Cellular Telephone Company, Olympia Cellular Telephone Company, Inc., Bellingham Cellular Partnership and Hood River Cellular Telephone Company, Inc., d/b/a AT&T Wireless for designation as an ETC in certain areas of Washington.

2. After AT&T Wireless Services, Inc. became a wholly owned subsidiary of Cingular Wireless LLC, the Commission granted the request of New Cingular Wireless PCS, LLC, Bellingham Cellular Partnership, Bremerton Cellular Telephone Company, Hood River Cellular Telephone Company, Inc., and, Olympia Cellular Telephone Company, Inc. d/b/a Cingular Wireless¹ to be designated as an ETC on April 29, 2005 in Docket No. UT-043011, Order No. 2.

3. On December 22, 2008, AT&T Mobility acquired assets from Rural Cellular Corporation including licenses, network assets and subscribers in Washington RSA-2 and RSA-3. The Commission designated RCC Minnesota, Inc., d/b/a Cellular One (RCC), as an eligible telecommunications carrier (ETC) in 2002. *RCC Designation Order*.² This was subsequently

¹ On January 8, 2007, Cingular Wireless LLC changed its name to AT&T Mobility LLC.

² *In the Matter of the Petition of RCC Minnesota, Inc., d/b/a Cellular One For Designation as an Eligible Telecommunications Carrier*, Order Granting Designation as an Eligible Telecommunications Carrier, Docket No. UT-023033 (Aug. 14, 2002) ("*RCC Designation Order*").

modified in the *RCC Modification Order*.³ RCC relinquished its ETC designation in Washington RSA-2 and RSA-3 effective December 22, 2008.⁴

4. In this proceeding, AT&T Mobility seeks to amend the ETC designation that it previously obtained to receive available support from the federal Universal Service Fund (“USF”) including, but not limited to, support for rural, insular and high-cost areas and low-income customers, to reflect the recent acquisition by AT&T Mobility of the assets and customers in Washington RSA 2 & 3 and to amend AT&T Mobility’s existing ETC designation to include those wire centers in **Exhibit A** (“Amended ETC Designated Area”).

II. Amended Name and Address of Petitioner

5. Petitioners are: 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 AT&T Mobility. The amended Petitioners are all subsidiaries of AT&T Mobility LLC.

6. AT&T Mobility LLC is managed by AT&T Mobility Corporation. The address for AT&T Mobility Corporation is:

1025 Lenox Park Blvd NE
Atlanta, GA 30319

7. All correspondence regarding this Petition should be sent to the following:

Cindy Manheim
General Attorney
AT&T
PO Box 97061
Redmond, WA 98073

³ *In the Matter of the Petition of RCC Minnesota, Inc., d/b/a Cellular One For Designation as an Eligible Telecommunications Carrier*, Order Granting Modification, Docket No. UT-023033, Order No. 2 (March 16, 2004)(“*RCC Modification Order*”).

⁴ Docket No. UT-023033, Order No. 4

III. Applicable Statutes and Rules

8. The statutes and rules implicated by the instant Petition are as follows: 47 U.S.C. §§ 214(e) and 254(d); 47 C.F.R. Part 54; and, WAC 480-123-020 through 480-123-999.

IV. Authorization, Service Area and Company Background

9. As AT&T Mobility obtained RCC's licenses in RSA-2 and RSA-3, it is authorized by the FCC to provide commercial mobile radio services ("CMRS") throughout the requested area.

V. Description of Expanded ETC Designated Area

10. AT&T Mobility seeks to expand its ETC designation to include the 28 non-rural and rural wire centers in Exhibit A. Pursuant to WAC 480-123-030(1)(f), AT&T Mobility provides as Exhibit B a map of the proposed expanded ETC service area along with AT&T Mobility's current ETC designated area, and as Confidential Exhibit C information on the existing and planned location of cell sites and coverage through the end of 2010.

VI . AT&T Mobility Will Continue to Offer the Supported Services to Qualify for Federal USF Support

11. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that to be designated as an ETC an applicant must, (1) be a common carrier: (2) offer the services that are supported by federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (2) advertise the availability of such services and the charges therefore using media of general distribution.⁵ As described in more detail below, AT&T Mobility will fulfill each of these requirements.

A. AT&T Mobility is a Common Carrier

⁵ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

12. A common carrier is defined by the Act as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio...” 47 U.S.C §153(10). The FCC has determined that wireless telecommunications is a common carrier service. See 47 C.F.R. §20.9(a). As AT&T Mobility provides wireless telecommunications service it is therefore a common carrier for ETC designation purposes.

B. AT&T Mobility Will Offer the Services Supported by the Federal Universal Service Support Mechanism

13. The services that are supported by the federal universal service support mechanisms under 47 C.F.R. §54.101 are:

- 1) voice grade access to the public switched network;
- 2) local usage;
- 3) dual tone multi-frequency signaling or its functional equivalent;
- 4) single-party service or its functional equivalent;
- 5) access to emergency services;
- 6) access to operator services;
- 7) access to interexchange service;
- 8) access to directory assistance; and
- 9) toll limitation for qualifying low-income consumers.⁶

14. AT&T Mobility already provides all of the nine above-listed services throughout its ETC designated area either using its own facilities or a combination of its own facilities and resale of another carrier’s services. AT&T Mobility will provide these services throughout the Amended ETC Designated Area as described in more detail below.

15. Voice Grade Access. “Voice grade access” permits a telecommunications user to transmit voice communications, including signaling the network to which the caller wishes to place a call, and receiving voice communications, including receiving a signal that there is a call. The FCC has determined that voice grade access to the public switched telephone network means

⁶ 47 C.F.R. § 54.101(a).

the ability to make and receive calls with a minimum bandwidth of 300 to 3,000 Hertz.⁷ AT&T Mobility meets this requirement since it provides voice grade access to the public switched network through interconnection arrangements with local telephone companies.

16. Local Usage. AT&T Mobility has a variety of rate plans that provide local usage consistent with 47 C.F.R. §54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering. For those carriers seeking ETC designation before the FCC, the carrier must demonstrate that it offers at least one rate plan that is comparable to the local usage plan of the ILEC serving the same area.⁸

17. AT&T Mobility is committed to providing its customers with valuable calling plans that are comparable in value to those offered by the incumbent LEC. Calling plans cannot be compared solely on price, but must also consider calling scope and the additional features and functionalities offered. AT&T Mobility's calling plans offer consumers numerous benefits including the inherent mobile nature of wireless service. Further, AT&T Mobility's "local" calling area is expansive. For example, customers that currently choose the AT&T Nationsm or the AT&T FamilyTalksm calling plans do not pay additional roaming or long distance charges in the United States. Thus, a call from anywhere on the AT&T Mobility network to anywhere else in the United States is a "local" call for customers who have subscribed to these calling plans. Also, the calling plans currently offered by AT&T Mobility include numerous features that are available at no additional charge, such as: Voicemail, Caller ID, Call Forwarding, Call Waiting, and Three-Way Calling. Moreover, many calling plans include either

⁷ 47 C.F.R. §54.101(a)(1).

⁸ See *Federal-State Joint Board on Universal Service, Report and Order*, 20 FCC Rcd 6371, 6385 (2005).

unlimited nights and weekend minutes or generous night and weekend minute packages. AT&T Mobility's calling plans currently offered also generally include unlimited mobile calling between AT&T Mobility customers, and allow customers to Rollover unused minutes for use in subsequent months. The AT&T Nationsm and AT&T FamilyTalksm calling plan brochures are attached as **Attachments D-1 and D-2**, respectively.

18. **DTMF Signaling**. "DTMF" is a method of signaling that facilitates rapid call set-up. The FCC has recognized that wireless carriers use out-of-band signaling mechanisms and found that "it is appropriate to support out-of-band digital signaling mechanisms as an alternative to DTMF signaling."⁹ AT&T Mobility currently uses out-of-band digital signaling and in-band multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling for rapid call set-up.

19. **Single Party Service**. "Single-party service" permits the exclusive use of a particular subscriber loop or access line by a single subscriber. The FCC has determined that a CMRS provider meets the requirement of offering single party service when it offers a dedicated message path for the length of a user's particular transmission.¹⁰ AT&T Mobility provides single party service, as that term is defined in Section 54.101 of the FCC's rules, by providing a dedicated message path for the length of the user's wireless transmission.

20. **Access to Emergency Services**. "Access to emergency service" means the ability to reach a public safety answering point ("PSAP") by dialing "911". The FCC requires that a carrier must provide access to enhanced 911 or "E911", which includes the capability of providing both automatic numbering information ("ANI") and automatic location information

⁹ *Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, FCC 97-157 (rel. May 8, 1997), ¶71.

¹⁰ 47 C.F.R. §54.101(a)(4).

(“ALI”).¹¹ AT&T Mobility currently provides 911 access to emergency services throughout its service area. AT&T Mobility is also capable of delivering ANI and ALI information over its existing network. AT&T Mobility has deployed Phase I and Phase II E911 service in accordance with the applicable FCC rules.

21. Access to Operator Services. Access to operator services means access to any automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call.¹² AT&T Mobility meets this requirement by providing access to operator services to its customers by dialing “0”.

22. Access to Interexchange Services. An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls.¹³ AT&T Mobility meets this requirement by providing all of its subscribers with the ability to make and receive interexchange calls.

23. Access to Directory Assistance. “Access to directory assistance” means the ability to provide access to a service that makes directory listings available.¹⁴ AT&T Mobility meets this requirement by providing its customers access to directory assistance by dialing “411”.

24. Toll Limitation. “Toll limitation” includes the offering of either toll blocking or toll control to qualifying low-income customers as a means of limiting or blocking the completion of outgoing toll calls.¹⁵ AT&T Mobility’s Lifeline calling plan will satisfy this

¹¹ 47 C.F.R. §54.101(a)(5).

¹² 47 C.F.R. §54.101(a)(6).

¹³ 47 C.F.R. §54.101(a)(7).

¹⁴ 47 C.F.R. §54.101(a)(8).

¹⁵ 47 C.F.R. §54.400(d).

requirement by allowing customers to call anywhere in the United States without incurring additional toll charges.

C. AT&T Mobility will Advertise Each of the Support Services

25. Pursuant to Section 54.201 of the FCC's rules, AT&T Mobility will advertise the availability of each of the supported services detailed above, throughout the Amended ETC Designated Area by media of general distribution. AT&T Mobility in its current Designated Area advertises its services through many different media, including television and radio, newspaper, and other print advertisements, as well as outdoor advertising, retail stores, direct marketing and the Internet. AT&T Mobility will expand its current advertising to include the Amended ETC Designated Area.

26. Consistent with the requirements of WAC 480-123-030(c) AT&T Mobility also commits to advertise its availability of Lifeline and Linkup Service in a manner that is reasonably calculated to reach low-income consumers not receiving discounts.

VII. Participation in Low Income Programs

27. All ETCs must participate in the federal Lifeline and Link Up programs. Lifeline is a discount off the monthly charge for a company's lowest-cost offering. 47 C.F.R. § 54.401. Link Up is a discount off of a one-time activation charge. 47 C.F.R. § 54.411.

28. AT&T Mobility will continue to participate in the FCC's Lifeline and Link Up programs and will expand this participation to the Amended ETC Designated Area. AT&T Mobility will offer the same Lifeline calling plan in its Amended ETC Designated Area that is currently available to eligible low income customers in AT&T Mobility's existing ETC designated area. The AT&T Mobility Lifeline Calling Plan is \$24.99 month before applicable discounts and includes: 300 anytime minutes; 1000 night and weekend minutes; no additional

charge for calls to anywhere in the United States; and, no roaming charges for calls that originate in Washington, Oregon and Idaho. Attached as **Exhibit E** is AT&T Mobility's brochure describing its Lifeline Service calling plan.¹⁶

VIII. AT&T Mobility Will Use Federal High Cost Support for its Intended Purpose in the Amended ETC Designated Area

29. Federal high cost universal service support is to be used for the "provision, maintenance, and upgrading of facilities and services for which the support is intended." 47 U.S.C §254(e). Pursuant to WAC 480-123-030(d) **Confidential Exhibit F** sets forth a substantive plan of the investments that AT&T Mobility plans to make with the federal high cost support in the Amended ETC Designated Areas that compiles with 47 U.S.C 254(e) in 2009 and 2010. **Confidential Exhibit F** also provides a description of how those expenditures will benefit customers.

IX. AT&T Mobility Will Comply with the Requirements in WAC 480-123-030(1)(g) for the Amended ETC Designated Area

30. WAC 480-123-030(1)(g) requires that a wireless ETC applicant demonstrate that it maintains at least four hours of back up battery power at each cell site, back up generators at each microwave hub, and at least five hours of back up battery power and back up generators at each switch.

31. AT&T Mobility maintains adequate back-up power to ensure functionality without an external power source. AT&T Mobility has conducted an extensive survey of the

¹⁶ Pursuant to the Commission's recent decisions AT&T Mobility will not be providing additional discounts through the Washington Telephone Assistance Program. See *In the Matter of the Petition of RCC Minnesota, Inc., d/b/a Cellular One For Designation as an Eligible Telecommunications Carrier*, Order Amending Final Order Designating RCC Minnesota, Inc., as an Eligible Telecommunications Carrier, Docket UT-023033, Order No. 3 (May 14, 2008).

Amended ETC Designated Area and certifies that in the Amended ETC Designated Area it currently satisfies the standards set forth in WAC 480-123-030(1)(g).

X. AT&T Mobility Complies with the Applicable Consumer Protection and Service Quality Requirements

32. Pursuant to WAC 480-123-030(1)(h) a wireless carrier must commit to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service ("Code"). AT&T Mobility as an existing ETC in Washington must as part of its annual filing commit to comply with the Code and it did so with the filing made on July 30, 2008 and will do so again in the filing due on July 31, 2009.

33. On an annual basis AT&T Mobility completes a certification process with CTIA. AT&T Mobility commits that it will comply with the Code in the Amended ETC Designated Area.

XI. Granting AT&T Mobility's Petition to Amend its ETC Designation is in the Public Interest

34. Pursuant to WAC 480-123-040, the Commission "will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C §254 and the designation is in the public interest." As demonstrated above, AT&T Mobility satisfies the requirements of WAC 480-123-030.

35. AT&T Mobility is in essence stepping into the shoes of RCC for the Amended ETC Designated Area. As such, AT&T Mobility is fulfilling the public interest that the Commission originally found in granting RCC ETC designation in Washington RSA 2 & RSA 3. Further, the Commission previously determined that designating AT&T Mobility as a competitive ETC will advance the purpose of universal service in Washington by providing

tangible consumer benefit. Granting AT&T Mobility's Petition to amend its ETC designation will further promote universal service in Washington by extending the Company's ETC designated area enabling its customers in this area to benefit from the Company's performance of the universal service obligations and investment in the network. Further, eligible low-income customers in this area will be able to receive Lifeline service from AT&T Mobility. Accordingly, the Commission should find that granting AT&T Mobility's Petition will serve the public interest.

XII. High-Cost Certification

36. Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify to the FCC and the Universal Service Administrative Corporation ("USAC") that the carrier will comply with Section 254(e) of the Federal Telecommunications Act of 1996.¹⁷

37. In support of the Company's request, AT&T Mobility hereby certifies that it will utilize all federal high-cost universal service support that it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to 47 U.S.C. 254(e).

XII. Affidavit in Support of Application

38. Attached hereto as **Exhibit G** is an Affidavit of Mike Maxwell, Vice President/General Manager for AT&T Mobility, verifying the accuracy of the facts contained herein.

¹⁷ 47 C.F.R. §§ 54.313, 54.314.

XIII. CONCLUSION:

WHEREFORE, pursuant to Section 214(e)(2) of the Act, AT&T Mobility respectfully requests that the Commission enter an Order amending the previous designation of AT&T Mobility an ETC to include the wire centers shown in **Exhibit A**.

Respectfully submitted,

July 31, 2009

By Cindy Manheim *by*
Cindy Manheim, Esq. (WA 26524) *mes*
General Attorney *with*
AT&T *permission*
PO Box 97061
Redmond, WA 97063

Attorney for Bellingham Cellular
Partnership, Bremerton Cellular Telephone
Company, Hood River Cellular Telephone
Company, Inc., New Cingular Wireless PCS, LLC,
and Olympia Cellular Telephone Company, Inc.

EXHIBIT A

NON-RURAL LEC WIRE CENTERS

LEC: Verizon Northwest, Inc. – WA (Includes Contel Exchanges)

Exchanges:	Loomis	
	Molson	Lake Wenatchee
	Tonasket	Leavenworth
	Curlew	Entiat
	Republic	East Wenatchee
	Newport	
	Brewster	
	Bridgeport	
	Manson	
	Chelan	
	Mansfield	
	Waterville	
	Cashmere	
	Wenatchee	

LEC: QWEST Corp. – WA

Exchanges:	Oroville
	Northport
	Colville
	Omak
	Coulee Dam
	Pateros
	Loon Lake
	Elk
	Springdale
	Deer Park

RURAL LEC WIRE CENTERS

LEC: CentruyTel of Washington, Inc.

Exchanges:	Kettle Falls	Inchelium (also known as Hunters)
	Valley	Coulee City
	Winthrop	Davenport
	Nespelem	
	Chewelah	
	Twisp	

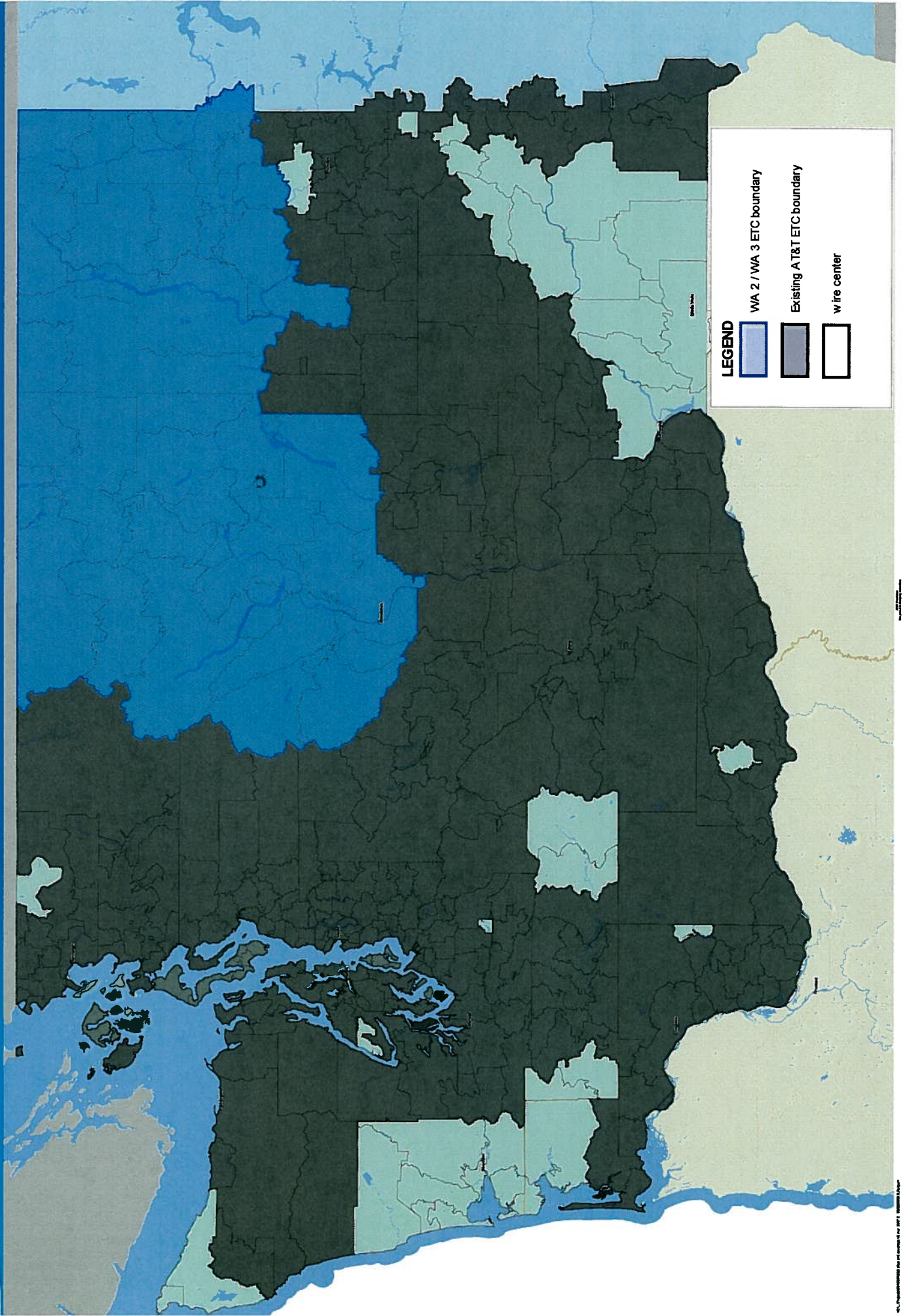
LEC: Pend Oreille Tel. Co.

Exchanges:	Cusick	Ione
	Mealine Falls	

Exhibit B
Map of Amended ETC Designated Area



AT&T Previous and New (WA 2 & WA 3) ETC Areas



CONFIDENTIAL & PROPRIETARY INFORMATION

Exhibit C

**Maps of Cell Site Additions and Coverage in Amended ETC Designated Area
for 2009 and 2010**

REDACTED

Exhibit D

D-1: AT&T Nation Calling Plan Brochure

D-2: FamilyTalk Calling Plan Brochure

Terms Applicable to AT&T-Nation GSM Plan: Credit approval required. Subscriber must live and have a mailing address within AT&T's owned network coverage area. An early termination fee of \$175 applies if service is terminated before the end of the contract term and will be reduced by \$15 for each full month toward your minimum term that you complete. If phone is returned within 30 days, activation fee will be refunded. If phone is returned within 31 days in like-new condition with all components, early termination fee will be waived. All other charges apply. Some dealers impose additional fees. Minute Accumulation Billing and Usage Allowance and other measured usage are billed in full-minute increments and actual billing and usage are rounded up to the next full increment at the end of each call for each wireless call. Minutes are billed in 30-second increments and actual billing and usage are rounded up to the next full increment at the end of each call for each wireless call. Minutes will be applied according to usage for every fraction of the last minute used on the last wireless call. Minutes longer to be processed, and billing for these calls may be delayed. Those minutes will be applied against your Any Network monthly minutes in the month in which the call appears on your bill. Unanswered outgoing calls of 30 seconds or longer incur airtime. You may obtain usage information by calling customer service or using one of our automated systems: **PhoneTones/No Prerequisite:** First month's charges are not prorated. Prices are subject to change. Prices do not include taxes. **Activation Fees:** \$35. **Activation Fee:** \$35 for each new line. **Nights and Weekends:** Nights are 9:00 p.m. to 6:00 a.m. Weekends are 9:00 a.m. Friday to 6:00 a.m. Monday based on time of day at the cell site or switch providing you service. Includes long distance calls made from the 50 United States, Puerto Rico and U.S. Virgin Islands to the 50 United States, Puerto Rico, U.S. Virgin Islands, Guam and Northern Mariana Islands. Roaming charges do not apply when roaming within the service area of land-based networks of the 50 United States, Puerto Rico and U.S. Virgin Islands. International long distance rates vary. Additional charges apply to services used outside the land borders of the U.S., Puerto Rico and U.S. Virgin Islands. Unpublished Voice Services: Unpublished voice services are provided primarily for the dialogue between two individuals. If you use of unlimited voice services for conference calling or call forwarding exceeds 750 minutes per month, AT&T may, at its option, terminate your service or change your plan to one with unlimited usage components. Unlimited voice services may not be used for monitoring services, data transmissions, transmission of keystrokes, transmission of recorded material, or other connections which do not consist of unattended dialogue between two individuals. AT&T took notice that you are using an unlimited voice service offering for other than the dialogue. AT&T may, at its option, terminate your service or change your plan to one with unlimited usage components. AT&T will provide notice that it intends to take any of the above actions, and you may terminate the agreement. Offered Usage: If you minutes of use, data usage or messaging usage (including unlimited service) on other carrier networks ("off-net usage") during any two consecutive months exceed your off-net usage allowance, AT&T may, at its option, terminate your service, deny your continued use of other carrier's coverage, or change your plan to one imposing usage charges for off-net usage. Your off-net usage allowance is equal to the plan of 150 minutes or 40% of the Anytime Minutes, the lesser of 5 MB or 20% of the MB included with your plan or the lesser of 3000 messages or 50% of the messages included with your plan. AT&T will provide notice that it intends to take any of the above actions, and you may terminate the agreement. Call Blocking: Your billing name may be displayed along with your wireless number on cellphones or other mobile devices and landline phones with Caller ID capability. Contact customer service for information on blocking the display of your name and number. You may be charged for both an incoming and an outgoing call when incoming calls are related to voicemail, even if no message is left. See Wireless Service Agreement for additional conditions and restrictions. **Follow-up Minutes:** Follow-up Minutes accumulate and expire through 12 rolling bill periods. Bill Period 1 (activation month) unused Anytime Minutes will carry over. Bill Period 2 (second Anytime Minutes) will begin to carry over. Follow-up Minutes accumulated starting with Bill Period 2 will expire each bill period as they reach a 12-bill-period age. Follow-up Minutes will also expire immediately upon default or if customer changes to a non-billable plan. If you change plans including the termination of a FamilyPlan plan, or if an existing subscriber joins your existing FamilyPlan plan, you may accumulate follow-up minutes in excess of your new plan or the primary FamilyPlan line's included Anytime Minutes will expire. Follow-up Minutes are not redeemable for cash or credit and are not transferable. **Mobile to Mobile Minutes:** Mobile to Mobile Minutes may be used when directly dialing or receiving calls from any other AT&T wireless phone number from within your calling area. Calls to AT&T voicemail and return calls from voicemail not included. **Data Plans:** No eligible data plan is required for certain devices, including iPhones and other designated smartphones and PDAs. Eligible data plans cover data usage in the U.S. and do not cover international data usage and charges. If it is determined that you are using an iPhone or other designated smartphone or PDA without an eligible data plan, AT&T reserves the right to add an eligible data plan to your account and bill you the appropriate monthly fee. **Apple iPhone™** TM and © 2009 Apple Inc. All rights reserved. Apple is a trademark of Apple Inc. registered in the U.S. and other countries. iPhone is a trademark of Apple Inc.

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at.com/wireless
1-866-MOBILITY (1-866-662-4548)
For deaf/hard of hearing customers:
(TTY) 1-866-241-6567
Questions on accessibility by
persons with disabilities:
1-866-241-6568

NCP BR T 0509 5500 E - Multi
 Revised 5/24/2009

Messaging & Data Unlimited Plan

UNLIMITED Text, Picture, Video and Instant Messages with Anyone on Any Network in the U.S.

PLUS
 UNLIMITED Access to the Mobile Web, Email, Search, Music, Apps and more
 NO OVERAGE CHARGES \$30



Prices are billed monthly and are valid for use in the U.S. only. Unless required by your device, plans may be canceled at any time. Data Plans Streaming Video and Music Applications require an Unlimited Plan. Additional subscription and download charges may apply. Data Plans are not available with Smartphones or LG9000. **Smart Solutions** require an Unlimited Plan. **Parental Controls** require an Unlimited Plan. **Parental Controls** require an Unlimited Plan. **Parental Controls** require an Unlimited Plan. **Parental Controls** require an Unlimited Plan.

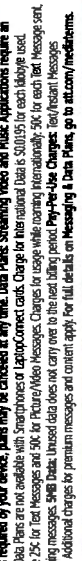
Messaging Unlimited \$20
 UNLIMITED Messages with Anyone on Any Network in the U.S. NO OVERAGE CHARGES

Messaging 1500 \$15
 1500 Messages with Anyone on Any Network in the U.S. 5¢/add'l msg

Messaging 200 \$5
 200 Messages with Anyone on Any Network in the U.S. 10¢/add'l msg

Data Unlimited \$15
 Connect to the Mobile Web, Email, Search, Music, Apps and more
 UNLIMITED Access to the Mobile Web, Email, Search, Music, Apps and more NO OVERAGE CHARGES

Data 5 MB \$5
 5 Megabytes Access to the Mobile Web, Email, Search, Apps and more 5¢/add'l MB



Additional charges for Premium Messages and content apply. For full details on Messaging Data Plans, go to at.com/wireless.

Smart Solutions

AT&T Navigator and Data Unlimited Bundle \$20/mo
 Combine AT&T Navigator and Data Unlimited into one bundle and save. Includes unlimited access to turn-by-turn directions, maps, real-time traffic, alerts, business listings, email, music, the Mobile Web and more.

Safety and Security \$4.99/mo
 Includes coverage for lost, stolen or accidentally damaged phones, as well as mechanical or electrical failure after the manufacturer's warranty has expired. Apple iPhone models do not qualify.

Wireless Phone Insurance \$4.99/mo
 Includes coverage for lost, stolen or accidentally damaged phones, as well as mechanical or electrical failure after the manufacturer's warranty has expired. Apple iPhone models do not qualify.

AT&T Roadside Assistance \$2.99/mo
 Help is just a phone call away - 24/7. We provide assistance with towing, dead batteries, lock-outs, fuel delivery and flat tires.

Detailed Billing \$1.99/mo
 See who you called and how long you talked. Tracks your calls, messages and data usage. Great for small businesses or anyone who wants to keep track of how they are using their service.

Phones can be used to purchase goods, services and subscriptions from AT&T or others. Consider our Data Plans, Smart Limits and Parental Controls.

Terms Applicable to Features: Certain features will not be available in all areas at all times. **Roadside Assistance:** Costs \$2.99/month per enrolled phone and is automatically billed to your account. You may cancel at any time. Roadside Assistance service is provided for wireless customers of AT&T by Assure Roadside Assistance Services, LLC, a licensed motor club. Refer to the Roadside Assistance Welcome Kit for complete terms and conditions. **AT&T Navigator:** Cancel within 30 days of the automatically-subscribed monthly rate shown. To cancel, you can visit the My Account panel on your handset or call AT&T customer support. Standard data and messaging charges apply when using AT&T Navigator. **Voice Mail:** See Smart Solutions brochure for details. **Push to Talk:** See Push to Talk brochure for coverage and bill details. **Pay-Per-Use Charge:** 15¢/min. **AT&T Mobile Backlog:** For more information, including terms and conditions, please see the Smart Solutions brochure or visit at.com/mobilebacklog. **Wireless Phone Insurance:** The Wireless Phone Insurance program is underwritten by Continental Casualty Company, a CIA company, CIA and administered by Assure Protection Services, LLC (Assure Protection Services Insurance Agency, LLC CA 1040036116). A licensed agent of CIA. May not be available in all states. Claims may be fulfilled with new or replacement replacement equipment. Dependent on phone model, each replacement is subject to a non-transferable \$50 or \$125 deductible. See a Wireless Phone Insurance brochure for complete terms and conditions of coverage. Available at any of our participating AT&T retail locations. Eligibility varies by device. Terms and Conditions are subject to change. **Video Share:** Requires 3G coverage and compatible phone. See at.com/VideoShare for more info. **Overage rate on the \$4.99 package is 30¢/min. on the \$9.99 package is 25¢/min. on the \$19.99 package is 25¢/min. Pay-Per-Use charge is 35¢/min.**

AT&T Nation™ CALLING PLANS



MORE BARS IN MORE PLACES™
BEST COVERAGE WORLDWIDE™



*Claim based on the most phones that work in the most countries.

AT&T Nation Bundles

Choose one of our popular AT&T Nation Bundles for the best mobile experience, including:

Messaging – UNLIMITED Text, Picture, Video and Instant Messaging to Anyone on Any Network in the U.S.

Mobile Web – UNLIMITED Internet access to news, sports, comedy, and music video clips, plus magazines and more

Email – UNLIMITED access to email accounts!

Music & Entertainment – UNLIMITED access to news, sports, comedy, and music video clips, plus download music

AT&T Nation Phone Bundles

For use with standard and quick messaging phones

Anytime Minutes with ROLLOVER*	Talk, Text & Web ¹ UNLIMITED Messaging to Anyone on Any Network in the U.S. UNLIMITED Mobile Web, Video & Email	Talk & Text ² UNLIMITED Messaging to Anyone on Any Network in the U.S.	Talk Pay-Per-Use Messaging and Mobile Web	Additional Minutes
450	\$69 ⁹⁹	\$59 ⁹⁹	\$39 ⁹⁹	45
900	\$89 ⁹⁹	\$79 ⁹⁹	\$59 ⁹⁹	40
1350	\$109 ⁹⁹	\$99 ⁹⁹	\$79 ⁹⁹	35
UNLIMITED	\$129 ⁹⁹	\$119 ⁹⁹	\$99 ⁹⁹	0/6

All prices are billed monthly and are valid for use in the U.S. New one- or two-year service agreement may be required. AT&T also imposes monthly a Regulatory Cost Recovery Charge of up to \$125 to help defray costs incurred in complying with State and Federal Telecom regulations, State and Federal Universal Service Charges, and surcharges for customer-based and revenue-based state and local assessments on AT&T. These are not taxes or government required charges. Rollover Minutes start accumulating with your second bill cycle. The rate plan components listed above will appear separately on your bill. Bundled pricing reflects 1. AT&T Nation Voice Plan plus Messaging & Data Unlimited 2. AT&T Nation Voice Plan plus Messaging Unlimited Plan 3. AT&T Nation Voice Plan plus Pay/Backery Personal Plan 4. AT&T Nation Voice Plan plus Pay/Backery Personal Plan. See Business Rate Plan brochure for details of Pay/Backery Personal Plan. Premium content not included. Telemarketing is prohibited. Additional software, hardware and/or subscription may be required for certain features. No service discounts are eligible on Unlimited Calling plans. *50 Minute Plan includes 5000 Night & Weekend Minutes. Additional charges and device restrictions apply for access to corporate email.

AT&T Nation Smartphone Bundles

For use with BlackBerry[®], Windows Mobile[®], Palm[®] and Symbian[®] Smartphones

Anytime Minutes with ROLLOVER*	Talk, Text, Web & Email ¹ UNLIMITED Messaging to Anyone on Any Network in the U.S. UNLIMITED Mobile Web, Video & Email	Talk, Web & Email ² UNLIMITED Mobile Web, Video & Email	Additional Minutes
450	\$89 ⁹⁹	\$69 ⁹⁹	45
900	\$109 ⁹⁹	\$89 ⁹⁹	40
1350	\$129 ⁹⁹	\$109 ⁹⁹	35
UNLIMITED	\$149 ⁹⁹	\$129 ⁹⁹	0/6

AT&T Advantages

The Best Coverage Worldwide*
More Bars in More Places.[™]

UNLIMITED Mobile to Mobile Calling
To over 77 million AT&T wireless customers.

UNLIMITED Night & Weekend Minutes
From 9 p.m. to 6 a.m. weekdays, plus all day Saturday and Sunday.

Rollover Minutes

Only AT&T lets you keep your unused minutes.

AT&T Upgrade Advantage

Special upgrade programs for customers.

Best Content

Exclusive video with CV, and the most complete music experience with AT&T Mobile Music.

International Services

Broadest global coverage of any U.S. carrier worldwide, with voice roaming in over 200 countries and data access in over 170 countries.

Convenient and Affordable Calling from the U.S. to over 220 countries – plus, international texting from the U.S. to over 160 countries.

Get discounted rates when you sign up for an international voice or data package.

Visit att.com/global for details.

*Claim based on the most phones that work in the most countries.

AT&T Navigator

Stay on track and on schedule with easy-to-read maps and driving directions on your GPS-enabled handset.

Avoid gridlock with real-time traffic alerts and automatic reroutes.

Hands-free safety with audible turn-by-turn directions. **Automatic map updates** for the latest streets and maps.

Try it FREE for 30 days* \$9⁹⁹ per month

*Limited time offer. See reverse for details.

Refer-A-Friend

Earn up to \$125 a year

for referring new wireless customers.

See att.com/wirelessreferral for details.



Wireless Coverage Area

Check coverage in your area at wireless.att.com/coverageviewer.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included in and out of 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 map graphics, 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 assumptions but is subject to change and may not be relied upon.



AT&T FamilyTalk Bundles

Includes 2 lines

Choose one of our popular AT&T FamilyTalk Bundles for the best mobile experience, including:

- Messaging** – UNLIMITED Text, Picture, Video and Instant Messaging to Anyone on Any Network in the U.S.
- Mobile Web** – UNLIMITED Internet access to search, email, news, weather, sports, apps, ring tones and more
- Email** – UNLIMITED access to email accounts*
- Music & Entertainment** – UNLIMITED access to news, sports, comedy and music video clips, plus download music

All prices are billed monthly and are valid for use in the U.S. Includes 2 lines. New one- or two-year service agreement may be required. AT&T also imposes monthly a Regulatory Cost Recovery Charge of up to \$1.25 to help defray costs incurred in complying with State and Federal telecom regulations. State and Federal Universal Service Charges and surcharges for customer-based and revenue-based assessments on AIRT. These are not taxes or government-required charges. The rate plan components listed above will appear separately on your bill. Bundled pricing reflects 1. AT&T FamilyTalk Voice Plan plus Messaging Unlimited for Families and Data Unlimited for both lines. 2. AT&T FamilyTalk Voice Plan plus Messaging Unlimited for Families. Rollover Minutes start accumulating with your second bill cycle. Premium content not included. tethering is prohibited. Additional software, hardware and/or subscription may be required for certain features. No service discounts are eligible on Unlimited Calling plans. *Additional charges and device restrictions apply for access to corporate email.

AT&T Advantages

The Best Coverage Worldwide*

More Bars in More Places.**

UNLIMITED Mobile to Mobile Calling To over 77 million AT&T wireless customers.

UNLIMITED Night & Weekend Minutes From 9 p.m. to 6 a.m. weekdays, plus all day Saturday and Sunday.

Rollover Minutes*

Only AT&T lets you keep your unused minutes.

AT&T Upgrade Advantage

Special upgrade programs for customers.

Best Content

Exclusive video with CV, and the most complete music experience with AT&T Mobile Music.

MORE BARS IN MORE PLACES**
BEST COVERAGE WORLDWIDE*

*Claim based on the most phones that work in the most countries.

Shared Anytime Minutes with ROLLOVER*	Talk, Text & Web ¹ UNLIMITED Messaging to Anyone on Any Network in the U.S. UNLIMITED Mobile Web, Video & Email	Talk & Text ² UNLIMITED Messaging to Anyone on Any Network in the U.S.	Talk Pay-Per-Use Messaging & Mobile Web	Additional Minutes
700	\$119.99	\$99.99	\$69.99	45
1400	\$139.99	\$119.99	\$89.99	40
2100	\$159.99	\$139.99	\$109.99	35
3000	\$199.99	\$179.99	\$149.99	25
4000	\$249.99	\$229.99	\$199.99	20
6000 Additional Lines (up to 3 add'l lines)	\$349.99	\$329.99	\$299.99	—
UNLIMITED Additional Unlimited Lines (up to 3 add'l lines)	\$249.99 \$109.99	\$229.99 \$99.99	\$199.99 \$99.99	0/0

AT&T Navigator

Stay on track and on schedule with easy-to-read maps and driving directions on your GPS-enabled handset.

Avoid gridlock with real-time traffic alerts and automatic reroutes.

Hands-free safety with audible turn-by-turn directions.

Automatic map updates for the latest streets and maps.



TRY IT FREE
for 30 days*
\$9.99
per month

*Limited time offer. See reverse for details.

International Services

Broadest global coverage of any U.S. carrier worldwide, with voice roaming in over 200 countries and data access in over 170 countries.

Convenient and Affordable Calling from the U.S. to over 220 countries – plus, international texting from the U.S. to over 160 countries.

Get discounted rates, when you sign up for an international voice or data package.

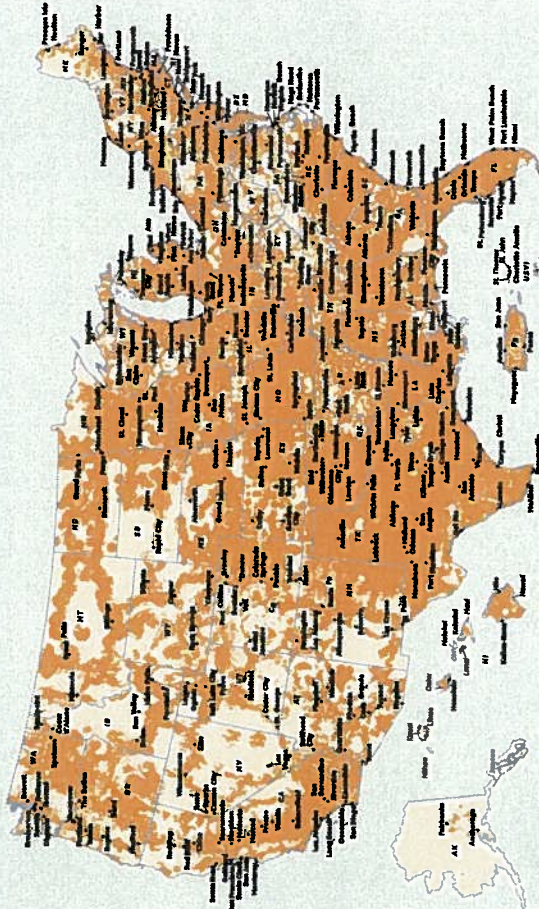
Visit att.com/global for details.

Refer-A-Friend

Earn up to \$125 a year

for referring new wireless customers.

See att.com/wirelessreferral for details.



Wireless Coverage Area
Check coverage in your area at wireless.att.com/coverageviewer.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included in and out of 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 map graphics, 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 assumptions but is subject to change and may not be relied upon.



Exhibit E
Lifeline Calling Plan Brochure

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 discounts, and even more if you qualify for additional Lifeline discounts from your state.

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

Qualifying for Lifeline

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:

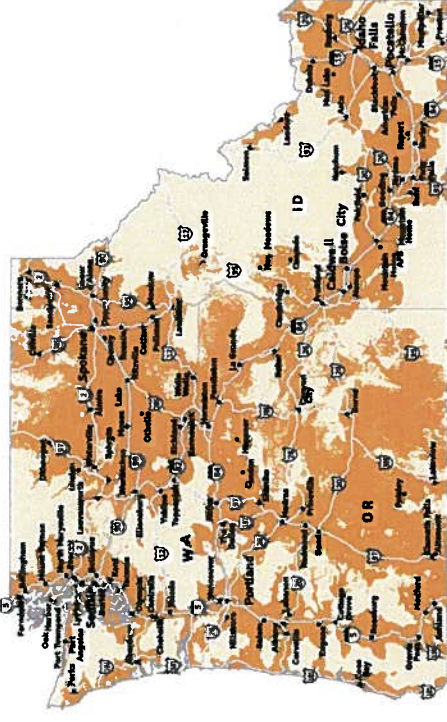
- Medicaid (not Medicare)
 - Food Stamps
 - Supplemental Security Income (SSI)
 - Federal Public Housing Assistance (FPHA) (Section 8)
 - Low Income Home Energy Assistance (LIHEAP)
 - National School Lunch Program (NSLP)
 - Temporary Assistance for Needy Families (TANF)
- Customers seeking to qualify 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 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 ineligibility.

Lifeline service for only \$24.99* per month
300 Anytime Minutes / 1000 Night and 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

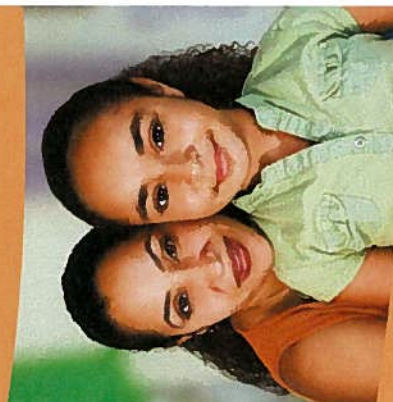
If you still have questions or would like to receive information by mail,

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 that is not guaranteed and may vary from the actual coverage. Actual coverage may differ substantially from the geographic area shown. Coverage is not available in all areas. Coverage is not guaranteed and may vary from the actual coverage. Coverage is not available in all areas. Coverage is not guaranteed and may vary from the actual coverage. Coverage is not guaranteed and may vary from the actual coverage. Coverage is not guaranteed and may vary from the actual coverage.

The night and weekend periods are from 9:00 p.m. to 6:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The active minutes used in Long Distance calls to the United States are counted against the 300 any-time minutes available each month. The active minutes used in Long Distance calls to the United States are counted against the 300 any-time minutes available each month. The active minutes used in Long Distance calls to the United States are counted against the 300 any-time minutes available each month. The active minutes used in Long Distance calls to the United States are counted against the 300 any-time minutes available each month.

Lifeline y Link Up
WASHINGTON



servicio Lifeline

Servicio con descuento
para clientes que reúnan
los requisitos



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CONFIDENTIAL & PROPRIETARY INFORMATION

Exhibit F

AT&T Mobility's Plan for Use of ETC Support in 2009

AT&T Mobility currently estimates that it will receive approximately [REDACTED] in federal ETC support in 2009 for the wire centers listed in Exhibit A should it promptly receive approval of this petition. The anticipated funding includes accounting for the interim cap on competitive ETCs ("CETCs"). The amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC and the number of AT&T subscribers that have service in a particular wire center. In addition, there are a number of matters currently pending at the FCC that, if adopted, could greatly impact the amount of funding available for CETCs.

AT&T Mobility further provides that this plan is an estimate as to how it anticipates utilizing ETC support in the applicable time period; however, the plan may be subject to modifications.

Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
Total		REDACTED

AT&T Mobility's Plan for Use of ETC Support in 2010

AT&T Mobility currently estimates that it will receive approximately \$[REDACTED] in federal ETC support in 2010 for the wire centers listed in Exhibit A. The anticipated funding includes accounting for the interim cap on CETCs. The amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC and the number of AT&T subscribers that have service in a particular wire center. In addition, there are a number of matters currently pending at the FCC that, if adopted, could greatly impact the amount of funding available for CETCs.

AT&T Mobility further provides that this plan is an estimate as to how it anticipates utilizing ETC support in the applicable time period; however, the plan may be subject to modifications.

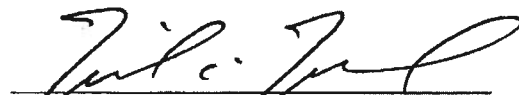
Item	Description	Actual Amount
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
REDACTED	REDACTED	REDACTED
Total		REDACTED

AFFIDAVIT OF MICHAEL MAXWELL

Before me, the undersigned authority, a notary public in and for the State of Oregon, appeared Michael Maxwell, who after being duly sworn, did state as follows:

1. I serve as Vice President and General Manager for AT&T Mobility LLC, and its subsidiaries Bellingham Cellular Partnership; Bremerton Cellular Telephone Company; Hood River Cellular Telephone Company, Inc.; New Cingular Wireless PCS, LLC; and Olympic Cellular Telephone Company, Inc. (collectively, "AT&T Mobility"). I am over eighteen years of age and am competent to make this affidavit.
2. I have read the Verified Petition of AT&T Mobility to Amend Its Designation As an Eligible Telecommunications Carrier and Request for Partial Waiver of WAC 480-123-030(1)(g). The statements contained therein and contained in this Affidavit are true and correct to the best of my knowledge, information, and belief.
3. Federal universal service support received by AT&T Mobility will be used 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.

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.



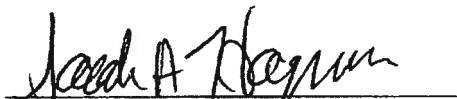
Michael C. Maxwell
Vice President/General Manager
Pacific Northwest Market

Signed at Lake Oswego, Oregon

July 30, 2009

Subscribed and sworn to before me
this 30 day of July, 2009

(Notary Seal)



Notary Public

