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July 2, 2018

**Via Electronic Mail and Overnight Mail**

Mark Johnson  
Executive Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

Received  
Records Management  
07/02/18 08:53  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: 2018 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 - E. The unredacted confidential documents 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 2017 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 2019; Exhibit C contains information about customer outages; Exhibit D contains unfulfilled service extension requests and Exhibit E contains customer complaint information by type of complaint that is not generally disclosed to the public.

AT&T Mobility believes that all of these documents contain valuable proprietary information regarding AT&T Mobility's telecommunications network in Washington, the

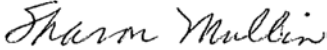
Mr. Johnson  
July 2, 2018  
Page Two

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.

Please note that in its 2016 ETC Certification filed on June 29, 2016 pursuant to WAC 480-123-080(3), AT&T Mobility included a disc containing a map in .shp format showing the general location where it provides commercial mobile radio signals. This information is required to be filed every three (3) years, so it is not included in this filing.

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

Sincerely,

  
Sharon Mullin

Enclosures

## AT&T Mobility (SAC 529910) Annual Eligible Telecommunications

### Carrier Report for 2017 and 2019 Annual Plan

AT&T Mobility, study area code (“SAC”) 529910,<sup>1</sup> submits its Annual Eligible Telecommunications Carrier Report for 2017 (“2017 Report”) and Annual Plan for 2019 in accordance with WAC 480-123-060 to WAC 480-123-080.

#### I. AT&T MOBILITY ETC REPORT FOR 2017

##### 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 universal service support was used in the preceding calendar year (2017) and will be used in the coming calendar year (2019) 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 2017

###### 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 one (1) unfulfilled requests for service in calendar year 2017. 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 requests for service and how AT&T Mobility attempted to provide service are attached hereto as **Confidential Exhibit D**.

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<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, Order Granting Petition 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).

#### **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 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 E**.

#### **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 2017, 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 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 2017 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 - 610-2017 CTIA BC-DR Compliance-1.

#### **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 2017 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. **Exhibit F** is an example of AT&T Mobility's Lifeline brochure available in 2017 for tribal and non-tribal areas;
- Maintained a dedicated Lifeline website with information about Lifeline Service along with an application <http://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp>.
- Continued advertising in newspapers across the state to publicize the availability of Lifeline Service, an example of AT&T Mobility's Lifeline advertisement for 2017 is included in **Exhibit G**. **Exhibit G** 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 targeted households below the poverty line or on government assistance based on census information obtained by AT&T Mobility. **Exhibit H** is the postcard used for this direct mail campaign; and,
- AT&T Mobility contacted various social service agencies/groups about its Lifeline Service

- AT&T Mobility distributed Lifeline Outreach Packets to the following tribes, Chehalis Confederated Tribes, Lummi Nation Employment, Muckleshoot, Nisqually Tribe, Nooksack Tribe, Puyallup Tribes, Samish Tribe, Sauk-Suiattle Tribe, Skokomish Tribe, Snoqualmie Tribal Court, Spokane Tribe and Yakima Indian Nation.

## **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 2019 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. (47 CFR 54.307(e)). The FCC will commence the phase down in legacy competitive ETC high-cost support when it FCC announces Mobility Fund Phase II winning bidders. We expect the FCC may make this announcement in 2018 or 2019.

## 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:

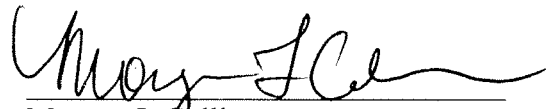
1. The Commission designated AT&T Mobility as an eligible telecommunications carrier ("ETC") in certain areas in Washington by Order dated April 29, 2005 in Docket UT-043011<sup>1</sup> which was expanded by Order 03 dated October 15, 2009 in the same docket;<sup>2</sup>
2. Federal universal service support received by AT&T Mobility was used in 2017 and will be used in 2019 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 2017, 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 2017, 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 2017, 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 2017 and 2019 Annual Plan*; and,

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<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>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.

6. During calendar year 2017, 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 and General Manager  
Pacific Northwest and Hawaii  
June 19, 2018

Subscribed and sworn to before me  
this 19 day of June, 2018

  
Notary Public *exp 5-27-2019*

