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June 29, 2020

Via Electronic Filing

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

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 06/29/20 14:45
 State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

RE: 2020 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 been filed electronically.

WAC 480-123-080(3) requires AT&T Mobility to include a map with its coverage in Washington every three (3) years. As this information was provided on June 28, 2019, it is not being provided this year.

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, C and E. The unredacted confidential documents for Exhibits B, C and E 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 2019 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 2021; Exhibit C contains information about customer outages; and Exhibit E contains customer complaint information by type of complaint that is not generally disclosed to the public.

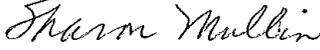
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AT&T Mobility believes that all these documents contain valuable proprietary information regarding AT&T Mobility's telecommunications network in Washington, the public disclosure of which would cause serious competitive harm to the company.

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

Enclosures