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July 30, 2010

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

**RE: AT&T Mobility's ETC Designation –Back-up Power
Docket UT-063060**

Dear Mr. Danner:

In Docket UT-063060, Order 02,¹ the Commission required AT&T Mobility to file with the Commission certain information regarding its back-up power augmentation efforts within its Eligible Telecommunications Carrier (“ETC”) designated area. Specifically, Order 02 requires AT&T Mobility to file reports: 1) for the three priority and coverage cell sites when the upgrades have been completed or by the end of the one year extension;² and, 2) for the remaining cell sites with its annual ETC filing with the Commission.³

Report on 3 Priority and Coverage Cell Sites:

By way of background, on February 15, 2007, the Commission granted AT&T Mobility a two-year partial waiver of the Commission’s requirement applicable to ETCs that each cell site must have at least four hours of back-up power⁴ and instead required that AT&T Mobility must “provide four hours of back-up at all Priority 1 and -98db cell sites using reliable alternate power sources.”⁵ On March 6, 2009, AT&T Mobility filed a Compliance Report with the Commission showing that all but three of its priority and coverage cell sites had been augmented to comply with the 4-hour back-up power requirement. In that same filing, AT&T Mobility requested a one year extension for the three priority and coverage cell sites that due to various reasons were not able to be upgraded by February 15, 2009. In Order 02, Ordering Paragraph 4, the Commission granted AT&T Mobility a one-year extension for these three cell sites.

¹ The Commission subsequently issued Order 03 which revised paragraph 15 of Order 02, but did not change any of the Ordering Paragraphs.

² See Ordering Paragraph 3 of Order 02.

³ See Ordering Paragraph 4(b) of Order 02.

⁴ See WAC 480-123-070(6) and 480-123-030(1)(g).

⁵ Order 01 in Docket UT-063060 (“Partial Exemption Order”), Ordering Paragraph 2.

AT&T Mobility hereby reports that the required upgrades to the 3 previously identified priority and coverage cell sites were completed by the following dates:

- Spokane: September 30, 2009
- Puyallup: September 30, 2009
- Bellingham: January 14, 2010

AT&T appreciates the Commission's understanding regarding the extenuating circumstances that delayed the back-up power augmentation for these three cell sites.

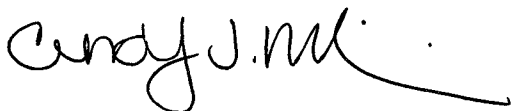
Status Report on Backup Power Upgrades for Non-Priority Cell Sites:

By way of background, on August 3, 2009, AT&T Mobility filed with the Commission a Request for Clarification or in the Alternate an Extension for Compliance with WAC 480-123-070(6) and WAC 480-123-030(1)(g) for its non-priority cell sites that were not previously augmented to include 4-hours of back-up power. In Order 02, the Commission required AT&T Mobility to engineer and install 4-hours of backup power at all of its remaining cell sites within its ETC designated area and granted AT&T Mobility a temporary exemption until July 1, 2012 to do so subject to AT&T Mobility filing a compliance status report on the back-up power upgrades in its annual ETC filing with the Commission.

In accordance with the Commission's requirement, AT&T Mobility filed a compliance status report on its back-up power upgrades as Exhibit F of its annual ETC certification filing.

Please contact me if you require any additional information.

Sincerely,



Cindy J. Manheim