April 12, 2012

By Electronic Mail and Overnight Mail

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 Petition Docket UT-063060**

Dear Mr. Danner:

Enclosed please find AT&T Mobility’s Petition for Request for Permanent Waiver for Sixteen (16) Cell Sites or in the Alternate Extension for Compliance with WAC §480-123-070(6) and WAC §480-123-030(1)(g) (“Petition”).

A portion of AT&T Mobility’s Petition 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 Exhibits A – D. The unredacted confidential documents have been printed on yellow paper, marked “Confidential per WAC 480-07-160)” and enclosed in a separate envelope 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: Exhibit A which includes site identification, site name, estimated cost to install power; Exhibit B which reflects in granular detail AT&T Mobility’s network in specific areas of the state; Exhibit C contains detailed information about the status of AT&T Mobility’s portable generator locations; and, Exhibit D which contains information regarding AT&T Mobility’s backup power augmentation project. AT&T Mobility believes that all of 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. 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