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IDAHO PUBLIC
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July 6, 2012

VIA UPS OVERNIGHT MAIL

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
PO Box 83720
472 West Washington
Boise, ID 83720-0074

GNR-T-12-06

Re: In the Matter of the Application of T-Mobile West Corporation for Designation as an Eligible Telecommunications Carrier – Case No. ~~TMW-T-10-01~~

Dear Ms. Jewell:

Enclosed for filing in the above-referenced docket are the original and seven copies of both “redacted for public inspection” and the “confidential – not for public inspection” versions of the “Annual Report and Certifications” that T-Mobile USA, Inc. filed with the Federal Communications Commission on July 2, 2012 pursuant to 47 C.F.R. Sections 54.313. An electronic version of the “redacted for public inspection” version is being filed today via email as well.

Please note the “confidential” filing contains confidential trade secret information that is exempt from public disclosure pursuant to Section 9-340D(1), Idaho Code. Pursuant to Rule 67 of the rules of Procedure of the Idaho Public Utilities Commission, the enclosed Confidential Information has been submitted on yellow paper and should not be posted to the Commission’s website.

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trinchero

MPT/jan

Enclosures

DWT 19891380v3 0048172-000324

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July 2, 2012

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: T-Mobile USA Inc. Eligible Telecommunications Carrier Annual Report and
Certifications (Idaho)
WC Docket No. 10-90

Dear Ms. Dortch:

On behalf of T-Mobile USA, Inc. ("T-Mobile") and pursuant to Section 54.313 of the Commission's rules,¹ enclosed please find the redacted, public version of T-Mobile's Eligible Telecommunications Carrier Annual Report and Certifications ("Annual Report") relating to its designation as an eligible telecommunications carrier in certain areas in Idaho. A confidential version of the Annual Report also is being submitted to your office under separate cover, including a request for confidential treatment pursuant to Section 0.459 of the Commission's rules, and to the administrator of the universal service fund.²

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

/s/ Jennifer L. Kostyu

Jennifer L. Kostyu
Counsel to T-Mobile USA, Inc.

Enclosures

¹ 47 C.F.R. § 54.313.

² *Id.* § 0.459.

**T-MOBILE USA, INC. ELIGIBLE TELECOMMUNICATIONS CARRIER
ANNUAL REPORT AND CERTIFICATIONS**

Filed Pursuant To:
47 C.F.R. § 54.313
WC Docket No. 10-90

July 2, 2012

T-Mobile USA, Inc., parent company to T-Mobile West Corporation¹, a wholly-owned subsidiary of T-Mobile USA, Inc. (collectively referred to and doing business as “T-Mobile”) hereby submits its Annual Report and Certifications (“Annual Report”), pursuant to 47 C.F.R. § 54.313 on behalf of its Eligible Telecommunications Carrier (“ETC”) designation in Idaho for Universal Service Administrative Company (“USAC”) assigned study area code 479013.²

On October 27, 2011, the Federal Communications Commission (“Commission”) adopted broad changes to certain Universal Service Fund mechanisms, including modifications to the requirements for ETC reporting and recertification.³ In the *USF/ICC Transformation Order*, the Commission adopted new annual reporting requirements for ETCs.⁴ The Commission also delegated to the Wireline Competition Bureau and the Wireless Telecommunications Bureau (“Bureaus”) the authority to revise and clarify rules as necessary to ensure that the reforms adopted in the *USF/ICC Transformation Order* were properly reflected in the rules. Thereafter, on February 3, 2012, the Bureaus

¹ On June 25, 2012, T-Mobile West Corporation converted to a Limited Liability Corporation and was renamed to T-Mobile West LLC; T-Mobile is in the process of making all necessary submissions to effectuate this change.

² *In the Matter of the Application of T-Mobile West Corporation for Designation as an Eligible Telecommunications Carrier*, Case No. TMW-T-10-01, Order No. 32319 (August 9, 2011) (“*Designating Order*”).

³ See *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”).

⁴ See 47 C.F.R. § 54.313.

released an Order clarifying certain reporting requirements, including those specifically related to ETCs that are subject to state commission authority.⁵ The Bureaus noted that they would provide impacted ETCs sufficient time to file the annual reports after the FCC obtained approval for the information collection from the Office of Management and Budget under the Paperwork Reduction Act. On May 8, 2012, the Wireline Competition Bureau notified carriers that the annual reports for 2011 would be due on July 2, 2012.⁶ Accordingly, this annual report and the certifications contained herein and attached comply with the new reporting requirements found in 47 C.F.R. § 54.313, which reflect the rule changes adopted in the *USF/ICC Transformation Order* and the *Clarifying Order*.

1. Service Area

In the *Designating Order*, the Idaho Public Utilities Commission (“Idaho Commission”) designated T-Mobile as an ETC, pursuant to 47 U.S.C. § 214(e)(2), in certain non-rural telephone company wire centers and rural telephone company study areas in Idaho for purposes of receiving federal universal service support. Attached as Exhibit A is a list of the non-rural telephone company wire centers and rural telephone company study areas included in T-Mobile’s ETC service area in Idaho.

2. Idaho Reporting Requirements

The Bureaus concluded in the *Clarifying Order* that if state-designated ETCs are required to report to the state commission some or all of the information required in the newly adopted Section 54.313(a)(2) – (a)(6), the ETCs also should file a copy of that

⁵ See *Connect America Fund*, Order, 27 FCC Rcd 605, 606-08 (WCB & WTB, 2012) (“*Clarifying Order*”).

⁶ See Wireline Competition Bureau Announces Filing Deadline of July 2, 2012 for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission’s Rules, *Public Notice*, DA 12-829, (released May 8, 2012) (“*Annual Report PN*”).

information with the Commission in 2012.⁷ T-Mobile is required to provide the following information to the Idaho Commission and therefore is providing a copy to the Commission, consistent with the *Clarifying Order*.

a. Network Outages

47 C.F.R. § 54.313(a)(2) requires ETCs to submit detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which the ETC is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affects: (i) at least ten percent of the end users served in a designated service area; or (ii) a 911 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, ETCs' annual report must include information detailing:

- (a) the date and time of onset of the outage;
- (b) a brief description of the outage and its resolution;
- (c) the particular services affected;
- (d) the geographic areas affected by the outage;
- (e) steps taken to prevent a similar situation in the future; and
- (f) the estimated number of customers affected.

T-Mobile evaluates each network outage on a case-by-case basis to determine the cause of the outage, the impact on services and customers, a resolution, T-Mobile's ability to meet its service provisioning obligations, including the availability of 911 services, and the steps that can be taken to prevent future outages. For the period of 2011 that T-Mobile was designated as an ETC, T-Mobile did not incur any reportable network outages. T-Mobile commits to remain vigilant to prevent outages in the future.

⁷ See *Clarifying Order*, 27 FCC Red at 608.

b. Unfulfilled Requests For Service

47 C.F.R. § 54.313(a)(3) requires ETCs to submit the number of requests for service from potential customers within the ETCs' service areas that were unfulfilled during the prior calendar year, and an explanation of how the ETC attempted to provide service to those potential customers. T-Mobile includes as Confidential Exhibit B its unfulfilled service request report for 2011.

c. Complaints Per 1,000 Connections

47 C.F.R. § 54.313(a)(4) requires ETCs to submit the number of complaints per 1,000 connections. The number of complaints per 1,000 connections T-Mobile addressed in 2011 is identified in Confidential Exhibit C. These complaints include formal complaints filed with T-Mobile and outside agencies, such as the Commission, the Idaho Commission, the Idaho Attorney General, and the Better Business Bureau in the state of Idaho.

3. Price Offerings

47 C.F.R. § 54.313(a)(7) requires ETCs to provide their price offerings in a format as specified by the Wireline Competition Bureau ("WCB"). T-Mobile makes available several different rate plans with varying amounts of intra and interstate usage, variant calling services and different calling areas, in addition to offerings that include additional services. The WCB has not yet provided guidance regarding the specific format of the pricing data, therefore, T-Mobile includes details regarding some of its currently offered rate plans, which is attached as Exhibit D. T-Mobile commits to amend this list to comply with any later WCB guidance to the extent required or requested to do so.

4. Entity Affiliation

47 C.F.R. § 54.313(a)(8) requires ETCs to identify any holding company, operating companies, affiliates, and any branding, as well as universal service identifiers for each such entity by Study Area Codes, as that term is used by the Administrator. T-Mobile West Corporation is a wholly-owned subsidiary and operating entity of T-Mobile, with USAC assigned study area code 479013 to represent its service area in Idaho. T-Mobile West Corporation provides service under the T-Mobile brand name.

5. Annual Report Certifications

47 C.F.R. § 54.313 requires ETCs to include certain certifications in their annual report. Each certification that T-Mobile is required to make is discussed in detail below, and T-Mobile's certification to each requirement is included as Exhibit E.

a. Service Quality Certification

47 C.F.R. § 54.313(a)(5) requires ETCs to certify that they are complying with applicable service quality standards and consumer protection rules. T-Mobile is a signatory to CTIA-The Wireless Association's® Consumer Code for Wireless Service, which is the applicable service quality and consumer protection standard for wireless carriers. T-Mobile has been consistently certified by CTIA-The Wireless Association® as being compliant with this code since 2003. T-Mobile was most recently re-certified by CTIA-The Wireless Association® as being compliant with this code on October 7, 2011. A copy of T-Mobile's most recent letter confirming its certification from CTIA-The Wireless Association® is attached as Exhibit F.

By the attached certification, T-Mobile hereby certifies that it complies with applicable service quality standards and consumer protection rules.⁸

b. Ability To Remain Functional In Emergency Situations Certification

47 C.F.R. § 54.313(a)(6) requires ETCs to certify that they are able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2). T-Mobile is able to function in emergency situations and demonstrates “that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”⁹ In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile’s network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then: (i) deploy network facilities

⁸ See CTIA-The Wireless Association’s® Consumer Code for Wireless Service, *available at* http://files.ctia.org/pdf/The_Code.pdf. Signatories to the CTIA Consumer Code agree to: (1) disclose rates and terms of service to consumers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6); separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; (10) abide by policies for protection of customer privacy; and (11) provide consumers with free notifications for voice, data, and messaging usage, and international usage.

⁹ 47 C.F.R. § 54.202(a)(2).

to accommodate capacity needs; (ii) change call routing translations; and (iii) deploy COWs to temporarily meet traffic needs until longer-term solutions, such as additional capacity and antenna towers, can be deployed.

- In the limited instances where T-Mobile has sites not equipped with fixed generators, the majority have battery back-up systems installed to maintain service in the event of a widespread power outage.

By the attached certification, T-Mobile hereby certifies that it is able to function in emergency situations.

6. Other Reporting Requirements Not Applicable in 2012

47 C.F.R. § 54.313 also identifies other reporting requirements, but the Commission has concluded that certain reporting requirements may not be applicable in 2012 for various reasons. Included below are the reporting requirements that are not applicable to T-Mobile in 2012.

a. Progress Report on Service Improvement Plan

47 C.F.R. § 54.313(a)(1) requires ETCs to submit a progress report on its five-year service quality improvement plan (“SIP”) filed pursuant to 47 C.F.R. §54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year. Pursuant to the *Clarifying*

Order, state-designated ETCs need not file progress reports on their SIPs in 2012.¹⁰ T-Mobile will provide a copy of its progress report on its SIP to the Commission in 2013, consistent with the *Clarifying Order* and any later guidance provided by the Commission.

b. Tribal Lands

47 C.F.R. § 54.313(a)(9) requires, beginning April 1, 2013, an ETC, to the extent it serves Tribal lands, file documents or information demonstrating that the ETC had discussions with Tribal governments that, at a minimum, included:

- (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- (ii) Feasibility and sustainability planning;
- (iii) Marketing services in a culturally sensitive manner;
- (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and
- (v) Compliance with Tribal business and licensing requirements.

T-Mobile's ETC service area in Idaho includes a portion, or the entirety, of the following federally recognized Tribal Lands: the Coeur d'Alene Reservation, the Fort Hall Reservation, and the Nez Perce Reservation. Consistent with 47 C.F.R. § 54.313(a)(9) and the *Clarifying Order*,¹¹ T-Mobile will undertake the required tribal consultation in 2012 and include the information identified above in its 2013 annual report.

¹⁰ See *Clarifying Order*, 27 FCC Red at 607.

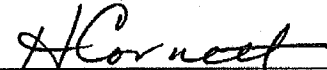
¹¹ See *id.* at 608.

CONCLUSION

Based on the foregoing information, T-Mobile respectfully requests the Commission accept its 2012 Annual Report for receipt of high-cost federal universal service support in accordance with 47 C.F.R. § 54.313, find that T-Mobile is in compliance with the same, and certify that T-Mobile is eligible to receive high-cost federal universal service support.

RESPECTFULLY SUBMITTED,

T-MOBILE USA, INC.

By: 
H. Skip Cornett
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
425-383-4000 (tel)

July 2, 2012

EXHIBITS TO ANNUAL REPORT

- Exhibit A: List of the Non-Rural and Rural Telephone Company Areas Included in T-Mobile's ETC Service Areas
- Exhibit B (Confidential): Unfulfilled Requests For Service
- Exhibit C (Confidential): Complaints Per 1,000 Connections
- Exhibit D: T-Mobile Rate Plans
- Exhibit E: Certifications
- Exhibit F: CTIA – The Wireless Association Confirmation Letter

REDACTED FOR PUBLIC INSPECTION

EXHIBIT A

**LIST OF THE NON-RURAL AND RURAL TELEPHONE COMPANY
AREAS INCLUDED IN T-MOBILE'S ETC SERVICE AREAS**

**T-MOBILE IDAHO
ETC SERVICE AREA**

Rural Telephone Company Study Areas	Study Area Code (SAC)	Wire Center
ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	472213	All
CENTURYTEL OF THE GEM STATE, INC.-ID	472223	All
CENTURYTEL OF THE GEM STATE, INC.-NV	552223	All
COLUMBINE TELCO DBA SILVER STAR COMMUNICATIPMS	462204	All
DIRECT COMMUNICATIONS ROCKLAND, INC.	472232	All
FARMERS MUTUAL TELEPHONE CO.	472221	All
FILER MUTUAL TELEPHONE CO.	472220	All
FREMONT TELCOM CO	472222	All
MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	472227	All
POTLATCH TELEPHONE CO., INC.	472230	All
PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	472231	All
RURAL TELEPHONE CO.	472233	All
SILVER STAR TELEPHONE CO., INC.	472295	All
Non-Rural Telephone Company Wire Centers		
QWEST CORPORATION	475103	AMFLIDMA
		BLFTIDMA
		BLSSIDMA
		BNCRIDMA
		BOISIDMA
		BOISIDNW
		BOISIDSW
		BOISIDWE
		BRLYIDMA
		BUHLIDMA
		CLWLIDMA
		CSFRIDMA
		DECLIDMA
		DWNYIDMA
		DYTNIDMA
		EAGLIDNM
		EDHZIDMA
		EMMTIDMA
		FKLNIDMA
		FRTHIDMA
		GDNGIDMA
		GLFYIDMA
		GRACIDMA
		HALYIDMA
		HGMNIDMA
		IDFLIDMA
		INKMIDMA
		JERMIDNM
		KMBRIDMA

**T-MOBILE IDAHO
ETC SERVICE AREA**

T Mobile Annual Certification
2012
Exhibit A

		KTCHIDMA
		KUNRIDMA
		LHSPIDMA
		LSMNIDMA
		MCCMIDMA
		MDTNIDMA
		MELRIDMA
		MRDNIDMA
		MRTGIDMA
		MTHOIDMA
		MTHOIDSO
		MTPLIDMA
		NMPAIDMA
		NPMOIDMA
		PCTLIDMA
		PCTLIDNO
		PSTNIDMA
		PYTTIDMA
		RBRTIDMA
		RCMDUTMA
		RGBYIDMA
		RIRIIDMA
		RVSDIDMA
		RXBGIDMA
		SDSPIDMA
		SHLYIDMA
		SHSHIDMA
		STARIDNM
		THTCIDMA
		TWFLIDMA
		WESRIDMA
		WNDLIDMA
		LAPWID01
		LSTNIDSH
		SPKNWAWA
Verizon	472416	BYVWIDXX
		CRALIDXX
		GENSIDXX
		HYLKIDXX
		MSCWIDXX
		PSFLIDXX
		RCFRWAXB
		RTHDIDXX
		SNPNIDXX
		RCFRWAXB

REDACTED FOR PUBLIC INSPECTION

EXHIBIT B

UNFULFILLED REQUESTS FOR SERVICE

THIS EXHIBIT IS BEING WITHHELD FROM PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

EXHIBIT C

COMPLAINTS PER 1,000 CONNECTIONS

THIS EXHIBIT IS BEING WITHHELD FROM PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

EXHIBIT D

T-MOBILE RATE PLANS

