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August 29, 2012

**VIA Overnight Mail**

Jean Jewell, Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, Idaho 8372-0074

GNR-T-12-06

**RE: Annual ETC Report of New Cingular Wireless PCS, LLC ("AT&T Mobility")**

Dear Ms. Jewell:

Enclosed please find the Annual Eligible Telecommunications Carrier Recertification Report ("Report") of New Cingular Wireless PCS, LLC ("AT&T Mobility") which is due on September 3, 2012.

AT&T Mobility's complete Report contains various confidential sections and therefore it is submitting under separate cover the following Confidential Reports: 3 (Detailed Outage Information); 4 (Unfulfilled Service Requests); 5 (Customer Complaints); and 10 (Progress Report and 2-Year Network Improvement Plan with Map). These documents contain confidential and trade secret information and are exempt from public disclosure.

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

Sincerely,

Debbi Waldbaum

Enclosures

# **ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL RE-CERTIFICATION**

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## Section 1: Eligible Telecommunication Carrier Information

Date of ETC Annual Report: **September 3, 2012**

Company Name: **New Cingular Wireless PCS, LLC ("AT&T Mobility")**

Address: **(for John Sisemore):**

**208 S. Akard Street  
Room 2532  
Dallas, TX 75202**

Company Contact Person/Title: **John Sisemore, Director – External Affairs**

Telephone Number: **(214)-757-3244**

Email Address: **john.sisemore@att.com**

Service Area Code (SAC): **479006**

Number of Idaho Telephone Service Assistance Program (ITSAP) recipients:  
*(Use number from last report submitted to the ITSAP Administrator)*

**April, 2012 – 28 ITSAP recipients**

**May, 2012 – 26 ITSAP recipients**

**June, 2012 – 26 ITSAP recipients**

## **Section 2: Description of Carrier's Local Usage Plan-- Competitive Eligible Telecommunications Carrier (CETC) Only**

*ETCs must submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline and ITSAP subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public website outlining the terms and conditions of such plan. C.F.R. § 54.202(a)(5).*

### **Description:**

**Lifeline service is offered for \$12.24 per month, giving the customer 600 Anytime Minutes/1000 Night & Weekend Minutes and Nationwide Long Distance Included. The night and weekend periods are from 9:00 p.m. to 6:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The airtime minutes used in long distance calls to the United States will be discounted from the plan. Originating international long distance calls will not be allowed. The roaming cost is \$0.45 per minute and airtime minutes used will be discounted from minutes included in the plan. International roaming is not available. No rollover can be made. The airtime minutes used in excess of the ones included in the plan will be charged at \$0.45 per minute. Call waiting, Caller ID, Voicemail, 6 way calling, call forwarding, and call holding are provided within the Lifeline program. AT&T Directory Assistance is available for \$1.99.**

**These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations.**

**Additional specifics of the Lifeline program can be found here: [www.att.com/mobility-lifeline](http://www.att.com/mobility-lifeline).**

### Section 3: Detailed Outage Information §54.313(a)(2)

Provide detailed information on any outage, as that term is defined in 47 C.F.R. § 4.5, of at least thirty (30) minutes in duration for each service area in which an ETC is designated for any facilities it owns, operates, leases or otherwise uses that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 9-1-1 special facility, as defined in 47 C.F.R. § 4.5(e). Specifically, the 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 steps taken to prevent a similar situation in the future; and (f) the number of customers affected. Reporting period is *January--December*. See Order No. 29841, page 18.

Number of outages: **See Confidential Report 3. This Report contains trade secret or confidential information and is being filed separately.**

Additional outage information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Section 4: Unfulfilled Service Requests §54.313(a)(3)

Provide the number of requests for service from potential customers within the ETC's service area(s) that were unfulfilled in the previous year (*January--December*). The ETC shall also detail how it attempted to provide service to those potential customers. See Order No. 29841, page 19.

The number of unfulfilled service requests from potential customers within the ETC's service area: **See Confidential Report 4. This Report contains trade secret or confidential information and is being filed separately.**

Additional information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Section 5: Customer Complaints §54.313(a)(4)

Provide the number of complaints per 1,000 handsets or lines for the previous year (*January--December*).

The number of customer complaints per 1,000 handset or working access lines: **See Confidential Report 5. This Report contains trade secret or confidential information and is being filed separately.**

Additional information: **AT&T Mobility has included in its Confidential Report 5 customer complaints filed with the Better Business Bureau.**

## **Section 6: Service Quality and Consumer Protection Certification**

### **§54.313(a)(5)**

*Provide certification that the carrier is complying with applicable service quality standards and consumer protection rules.*

**AT&T Mobility complies with the CTIA Consumer Code for Wireless Service. See also attached certification.**

## **Section 7: Ability to Remain Functional in Emergencies Certification**

### **§54.313(a)(6)**

*ETCs must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.*

**47 C.F.R. §54.202(a)(2) requires that an ETC demonstrate its ability to remain functional in emergency situations, including demonstrating 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.**

**AT&T has a comprehensive emergency response plan in place. All of AT&T Mobility's cell sites within its ETC designated area in Idaho have permanent battery back-up power in the event that commercial power is lost. For outages that last an extended period of time, AT&T Mobility also has a number of portable generators that can be deployed and AT&T's cell sites are equipped to accept "plug in" portable generators. Permanent generators are located at all switch locations.**

**AT&T Mobility also has monitoring systems in place so that it quickly knows if any of its switches or cells sites are not functioning properly. Wireless carriers remain dependent on the wireline network, in many cases, to provide connectivity between the cell site and the switch, from switch to switch, and between the wireless network and the landline network. AT&T Mobility has available portable back-up microwave equipment to connect cell sites to the switching center in the event of a long term outage of leased landline facilities. AT&T Mobility also has a cell site on wheels ("COWs") for emergency or temporary deployment in Idaho. In addition, there is often overlapping coverage from more than one cell site in an area which may allow customers to get service from an adjacent cell site in case the closest cell site is not functioning properly.**

**Further, AT&T Mobility has the ability to reroute traffic from its switches to the Public Switched Telephone Network ("PSTN"). Specifically, AT&T Mobility's switches have redundant and diverse paths to the PSTN. In the event of a facility failure on one path to the PSTN, calls are redirected to the redundant route without a major disruption in service.**

## **Section 8: Additional Voice Rate Data §54.313(h)**

*All incumbent local exchange carrier recipients of high-cost support must report all of their flat rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defines in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report liens and rates in effect as of June 1.*

**See attached Report 8 – “Voice Rate Data”.**

## **Section 9: Federal USF High-Cost Support Certification §54.313, §54.314**

*Pursuant to FCC regulations, in order for ETCs to continue to receive federal USF, the Commission “must file an annual certification with the USAC and the [FCC] stating that all federal high-cost support provided to such carriers within that State will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”*

NOTE: See “Example A” *Affidavit of Business or Corporate Officer* for the above certification requirements.

**See attached certification.**

REPORT 8  
VOICE RATE DATA  
Values reported as of August 24, 2012

RATE COMPARABILITY ANALYSIS		Name: AT&T Mobility	
AT&T SAC 479006		Project Mutual Tel SAC 472231 (ILEC)	
\$25 Monthly Plan One Time Device Fee	\$25.00 from \$19.99	Basic residential phone service	\$16.75
Features/charges:			
250 Anytime Minutes	\$0.00	Applicable State Fees applied to all carriers	\$0.07 per line per month
Long Distance	\$0.00	ITSAP (State USF)	\$1.00 per line per month
Roaming Charges	\$0.00	E911 County Fee	\$0.02 per line per month
Additional Minutes	\$0.45 per minute	Telecom Relay Service (TRS)	\$0.25 per line per month
Basic Voicemail	\$0.00	Enhanced Emergency Grant Fee	
Call Waiting	\$0.00	(in counties where authorized by the county officials)	
Caller ID	\$0.00	<b>Total</b>	<b>\$1.34 per line per month</b>
Long Distance	\$0.00	Caller ID	\$6.95
Conference Calling	\$0.00	Anonymous Call Rejection	\$1.75
Call Forwarding	\$0.00	Call Waiting	\$1.75
AT&T Directory Assistance	\$1.89	Call Forwarding	\$1.75
		Three-Way Calling	\$1.75
		Automatic Recall	\$1.75
		Automatic Call Back	\$1.75
		PMT Message Center	\$5.95
		PMT Message Center	\$3.95
		Distinctive Ring	\$4.95
		Premise Wire Maintenance	\$2.00
		Long Distance	\$0.15 per min, with a \$3.95 monthly fee
		Call Mexico	\$0.05 per min., with a \$4.95 monthly fee
		Call Canada	If use less than 2 hours per month, no monthly fee.
		Flat 12c Plan	If use between 2-3 hours per month: out of state 8c per minute; in state 12c per minute plan; with a \$4.20 monthly fee.
		8/12 Plan	If use more than 2 hours of long distance to in-state and out of state; \$5.95 monthly fee and 7 cents a minute.
		7c Plan	Toll-free numbers; \$1.00 per month and 14c per minute for incoming calls.
		Toll-Free Numbers	
<a href="http://www.att.com/shop/wireless/plans/voice/sku5360236.html#fbid=c0VICEFP-MZ">http://www.att.com/shop/wireless/plans/voice/sku5360236.html#fbid=c0VICEFP-MZ</a>			
<b>Total</b>	<b>\$25.00</b>	<b>Total</b>	<b>\$31.15</b>

Additional Carrier's Information	
Albion Tel Co - ATG	\$6.95 per month LD \$0.12 per minute in state LD \$0.05 per minute out of state LD Extra charge for each additional feature
Custer Tel Co	\$4.95 per month LD \$0.10 per minute LD in and out of state Extra charge for each additional feature
File Mutual Tel	4.95 per month LD \$0.07 per minute LD in and out of state Extra charge for each additional feature
CenturyTel of Idaho	\$44.95 per month unlimited
Direct Com - Rockland	\$25.76 basic local service, no LD included
Silver Star Tel - ID	\$24.10 for basic \$0.105 per minute LD in and out of state Extra charge for each additional feature

<http://www.silverstar.com/Services/Telephone/Landline.aspx>

<http://www.directcom.com/local.htm>

<http://www.centurylink.com/home/phone/>

<http://filetel.com/phone.php>

[http://www.custertel.net/phone\\_features.html](http://www.custertel.net/phone_features.html)

<http://www.attnet.net>

<http://www.pmt.org/telephone.php>

State of Colorado )  
 ) ss  
County of Arapahoe )

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER  
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER  
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,  
AND USE OF FEDERAL HIGH-COST SUPPORT.

AFFIDAVIT

The Idaho Public Utilities Commission Order No. 29841 requires that each Eligible Telecommunications Carriers certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am employed by AT&T Mobility Services LLC, and serve in the position of Vice President/General Manager of AT&T Mobility Corporation, which is the manager of New Cingular Wireless PCS, LLC ("AT&T Mobility" or "the Company"), an eligible telecommunications carrier receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. The Company is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.202(a)(2).
5. I also certify that all federal universal service support funds received by the Company during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2013, through December 31, 2013, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to the Idaho Public Utilities Commission ("IPUC") to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.

Jenifer Robertson  
Jenifer Robertson  
Vice President/General Manager  
8/28/2012  
Date

SUBSCRIBED AND SWORN to before me this 28 day of August, 2012

Lynne M. Liali  
Notary Public for Colorado, residing at 9818 Cypress Pt. Cir, Lone Tree, CO 80124  
My Commission expires 10-31-2012

## Section 10: Two-Year Network Improvement Plan and Progress Report

*The annual report must include a progress report on the carrier's two-year service quality improvement plan, including maps detailing its progress toward meeting the plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. This information shall be submitted at the wire center level. The annual report must also include an updated two-year network improvement plan indicating plans for future investment.*

### Two-Year Network Improvement Plan Format

#### **Year 1: January 1, 2012—December 31, 2012\***

Wire center  
Description of project improvement  
Status  
Project start date  
Project completion date  
Estimated cost of project  
Additional comments

#### **Year 2: January 1, 2013—December 31, 2013\***

Wire center  
Description of project improvement  
Status  
Project start date  
Project completion date  
Estimated cost of project  
Additional comments

\*This report is intended to be a forward-looking view of a carrier's network improvement plan. Please do not provide information for any months earlier than those listed above.

Note: The ETC may wish to submit the Two-Year Network Improvement Plan as "confidential information." If so, please follow the IPUC Rules of Procedure for [Information Exempt From Public Review—Definitions—Form—Procedures](#). See IDAPA 31.01.01, Rule 67

See Confidential Report 10 which contains a progress report on AT&T Mobility's Calendar year ("CY") 2011 (January 1, 2011 to December 31, 2012) network improvements. This Report contains trade secret or confidential information and is being filed separately.

Confidential Report 10 also contains an updated two-year network improvement plan for AT&T Mobility for CY2012 (January 1, 2012 to December 31, 2012) and CY2013 (January 1, 2013 to December 31, 2013).

In addition, Confidential Report 10 includes a map depicting coverage and cell site locations.

For CY2012 and CY2013, AT&T Mobility has projected receipt of federal high cost support under the current federal rules, including the interim cap of high cost support for competitive ETCs ("CETCs"). As the Commission is aware, the amount of funding AT&T Mobility actually receives is dependent on a number of variables, including the per line support amount of the underlying ILEC, the number of AT&T Mobility subscribers in a particular wirecenter, and the amount of support received by other CETCs in the state. In addition, there are a number of matters currently pending before the FCC that, if adopted, could greatly impact the amount of funding available for AT&T Mobility. If the federal high cost support that AT&T Mobility receives is less than it currently anticipates, AT&T Mobility may reduce or eliminate some projects included in its plan CY2012 and/or CY2013 plans.

AT&T Mobility is committed to spending the federal high cost support that it receives for the provision, maintenance and upgrading of services and facilities for which the support is intended. As there is often a long lead time for capital projects, if for some reason AT&T Mobility receives more federal high cost support in CY2012 than is currently anticipated, AT&T Mobility may need to spend this support in the following calendar period.

In addition to the variability in federal high cost support received, AT&T Mobility further notes that there may be factors outside of its control that cause a delay to a project listed in the CY2012 and CY2013 plan, such as zoning/permitting issues, lease negotiations, back-order of equipment and so forth. Unfortunately, these delays may cause a project to be moved to a subsequent fiscal period for completion.

## Section 11: References and Filing Instructions

Links:

[FCC Report and Order 05-46](#)

Idaho Commission [Order No. 29841](#)

Idaho Telephone Customer Relations Rules: [IDAPA 31.41.01](#)

IPUC Rules of Procedure: [Information Exempt From Public Review—Definitions—Form—Procedures.](#)

Instructions: Company documents and forms may be attached to comply with any of the reporting sections.

To comply with the certification requirements, the company may use the sample affidavit attached as “Example A” or one of its own. The affidavit must certify the company’s: 1) appropriate use of federal universal support funds, 2) compliance with service quality and customer protection provisions, and, 3) ability to remain functional in an emergency.

Due Date: September 1 of each year. This year’s report is due by 5PM, MDT on **September 3, 2012.**

Submit one (1) copy to: Idaho Public Utilities Commission  
Commission Secretary  
472 W. Washington  
PO Box 83720  
Boise, Idaho 83720-0074

Or email to: [jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

Questions/Comments: Grace Seaman  
IPUC Utilities Analyst  
Phone: 208.334.0352  
FAX: 208.334.3762  
Email: [grace.seaman@puc.idaho.gov](mailto:grace.seaman@puc.idaho.gov)