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IDAHO PUBLIC
UTILITIES COMMISSION

August 31, 2012

VIA UPS OVERNIGHT MAIL

GNR-T-12-06

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

Re: T-Mobile West LLC, Eligible Telecommunications Carrier Certification Report Pursuant to Order Nos. 29841 and 32319

Dear Ms. Jewell:

On behalf of T-Mobile West LLC, enclosed for filing are an original and seven copies of the Confidential version of the Report Pursuant to Order Nos. 29841 and 32319. Also enclosed are an original and seven copies of the Redacted version of the Report. A disk containing both Reports is also enclosed.

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trincherro

MPT/jan

Enclosures

DWT 20280300v1 0048172-000324

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BEFORE THE
PUBLIC UTILITIES COMMISSION
OF IDAHO

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UTILITIES COMMISSION

In the Matter of)
)
2012 Eligible Telecommunications Carrier)
Certification Reports) Docket No. GNR-T-12-06
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_____)

**T-MOBILE WEST LLC
ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION REPORT
PURSUANT TO ORDER NOS. 29841 and 32319**

T-Mobile West LLC (hereinafter "T-Mobile" or the "Company")¹ hereby submits this annual eligible telecommunications carrier ("ETC") certification report pursuant to Order No. 29841² ("*ETC Requirements Order*"), Order No. 32319³ ("*Designating Order*") of the Public Utilities Commission of Idaho ("Commission"), and 47 C.F.R. §§ 54.313 and 54.314.

I. COMMUNICATIONS REGARDING THIS REPORT

All pleadings, correspondence, and communications regarding this Report should be addressed as follows to:

Mark P. Trinchero
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Principal Corporate Counsel
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T-Mobile USA, Inc.
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Teri.Ohta@t-mobile.com

¹ In Order No. 32581, the Commission amended T-Mobile's ETC designation effective June 25, 2012, to reflect the change in its business name from T-Mobile West Corporation to T-Mobile West LLC.

² See *In the Matter of the Application of WWC Holding Co., Inc. dba Cellular-One® Seeking Designation as an Eligible Telecommunications Carrier That May Receive Federal Universal Service Support*, Case No. WST-T-05-1, Order No. 29841, Appendix at C (August 4, 2005).

³ *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).

II. BACKGROUND

T-Mobile was designated as an ETC in certain rural telephone company study areas and non-rural telephone company wire centers across the state of Idaho (“Designated Area”) by the Commission in the *Designating Order*. A list of the non-rural telephone company wire centers and rural telephone company study areas that comprise the Designated Area is included as Attachment A. T-Mobile’s Universal Service Administrative Company (“USAC”) assigned study area code is 479013.

On October 27, 2011, in its *USF/ICC Transformation Order*, the Federal Communications Commission (“FCC”) adopted changes to its universal service rules⁴ and, on February 6, 2012, in its *Lifeline Reform Order*, the FCC adopted further changes to its universal service rules governing the provision of Lifeline service.⁵ Among the changes adopted in these two orders, the FCC revised the annual reporting and certification requirements, which are now reflected in 47 C.F.R. § 54.313. In this Report (and Attachments)⁶, T-Mobile addresses each of the reporting requirements adopted by the Commission in the *Designating Order*, in the *ETC Requirements Order*, and in the updated annual reporting and certification requirements adopted in the *USF/ICC Transformation Order*.

III. T-MOBILE’S UNIVERSAL SERVICE SUPPORT

In the *USF/ICC Transformation Order*, the FCC took several steps toward developing a budget for the Universal Service Fund including (among other things) eliminating the identical

⁴ *Connect America Fund et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”).

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 (“*Lifeline Reform Order*”). In its Lifeline Reform Order, the FCC adopted additional requirements for the provision of Lifeline service, including Lifeline reporting requirements, but none of these requirements change an ETC’s high-cost annual reporting obligations under 47 C.F.R. § 54.313.

⁶ Some of the Attachments to this Report contain confidential and trade secret information exempt from public disclosure pursuant to Section 9-340D, Idaho Code, and are filed pursuant to Commission Rule of Procedure 67.

support rule, limiting the per line high cost support, freezing high cost support for all competitive ETCs (“CETCs”) for an interim period of six months in 2012, and phasing down all high cost support for CETCs over a five-year period beginning in July 2012. Pursuant to the *USF/ICC Transformation Order*, monthly high cost support for CETCs will be the aggregate support received in 2011 divided by 12. Beginning in July 2012, CETCs became subject to a 20 percent per year phase down, with all legacy high cost support to CETCs being eliminated by 2016.

In calendar year 2011, T-Mobile received a total of \$246,799 in federal high cost universal service support for its Idaho study area. Based on the computations provided by USAC, T-Mobile currently estimates that it will receive approximately \$210,000 in federal high cost universal service support in Idaho in 2012 based upon the steps taken by the FCC in the *USF/ICC Transformation Order* (identified above) to reduce legacy funding for CETCs. This estimate is based on current information and may change based upon clarification or reconsideration of the rules adopted in the *USF/ICC Transformation Order*.

IV. T-MOBILE’S ANNUAL CERTIFICATION

47 U.S.C. § 254(e) requires that an ETC receiving federal universal service support “shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” The FCC later concluded “that states should be required to file annual certification with the Commission to ensure carriers use universal service support ‘only for the provision, maintenance, and upgrading of facilities and services for which the support is intended’ consistent with Section 254(e).”⁷ In the *USF/ICC Transformation Order*, the FCC modified the high-cost certification requirements, which are incorporated into 47 C.F.R. § 54.314 and in T-Mobile’s attached certification. Separately, the Commission concluded in the

⁷ Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, ¶ 187.

ETC Requirements Order that “[i]n order to be eligible for federal USF funding in any given year, the carrier must * * * certify to the Commission that all federal high-cost support provided to the carrier for service areas in Idaho will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended.”

Accordingly, included as Attachment B is T-Mobile’s annual certification based upon the requirements of 47 U.S.C. § 254(e), 47 C.F.R. § 54.314, Section D of the Appendix of the *ETC Requirements Order*, certifying that it will utilize federal high cost universal service funds for the purposes for which those funds are intended, which will enable the Commission to make the required annual certification to the FCC. T-Mobile demonstrates herein that it meets all applicable annual certification requirements as described below.

A. 2011 Progress Report

Standard C(1) of the *ETC Requirements Order* requires an ETC to submit a progress report demonstrating what progress has been made in the last year towards goals outlined in the most recent two-year network improvement plan. The progress report must include maps detailing progress towards meeting its 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 network improvement targets that were not met. T-Mobile’s progress report detailing its use of its 2011 receipt of federal high cost universal service support is included as Confidential Attachment C. In accordance with Standard C(1) of the *ETC Requirements Order*, T-Mobile will track how the Company expends federal high cost universal service support in 2012 and beyond.

B. 2012-2013 Network Improvement Plan

Standard C(1) of the *ETC Requirements Order* requires an ETC to submit a new two-year network improvement plan, indicating plans for future investments that identify anticipated capital expenditures in the ETC's Designated Areas, includes maps detailing planned targets, and explains how universal service support will be used to improve signal quality, coverage, capacity, or other network targets.

T-Mobile's Network Improvement Plan for Idaho is filed as Confidential Attachment D. T-Mobile's Network Improvement Plan identifies projected network improvements and upgrades that will be funded with universal service funds in 2012 and 2013 to improve signal quality, coverage, and/or capacity. All cell site and site modification projects are designed to improve signal quality, coverage, and capacity, and switch upgrades are designed to improve service quality and capacity. The Network Improvement Plan further identifies other expenditures in the state for the provision, maintenance, and upgrading of facilities used to deliver supported services to consumers consistent with 47 U.S.C. § 254(e). The map included in Confidential Attachment E identifies the planned projects and the areas served by these improvements.

The selection of the projects in the Network Improvement Plan is based on the Company's evaluation of many factors, including current consumer demand, competitive forces, long-term planning, available capital, and others. As these factors change, the Network Improvement Plan may be modified. In addition, forces beyond the Company's control (for example, zoning issues related to cell site placement) may result in modifications to planned projects or timelines. As a result, the content and timing of the projects in the Network Improvement Plan are subject to change. In addition, if the actual amount of federal high cost universal service funding received varies from the amount currently estimated, T-Mobile

reserves the right to modify its Network Improvement Plan accordingly. Any modifications will be reported in future Network Improvement Plans and progress reports.

C. Network Outages in 2011

Standard C(2) of the *ETC Requirements Order* and 47 C.F.R 54.313(a)(2) require an ETC to make an annual filing of 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 utilizes that potentially affects at least ten percent (10%) of the end users' service in a designated service area or a 911 special facility during the previous calendar year. Specifically, the ETC's 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 number of customers affected.

In accordance with Standard C(2) of the *ETC Requirements Order* and 47 C.F.R § 54.313(a)(2), T-Mobile submits as Confidential Attachment F its network outages for the period in which it was designated as an ETC in 2011.

D. Unfulfilled Requests for Service in 2011

Standard C(3) of the *ETC Requirements Order* and 47 C.F.R. § 54.313(a)(3) require an ETC to identify the number of requests for service from potential customers within the ETC's service area that were unfulfilled during the previous calendar year. The ETC must also detail

how it attempted to provide service to those potential customers. T-Mobile submits as Confidential Attachment G its unfulfilled service requests for the period in which it was designated as an ETC in 2011. In accordance with Standard C(3) of the *ETC Requirements Order* and 47 C.F.R. § 54.313(a)(3), T-Mobile will take the necessary steps to resolve any requests for service and track all requests for service (as necessary) in 2012 and beyond.

E. Complaints Per 1,000 Handsets in 2011

Standard C(4) of the *ETC Requirements Order* requires an ETC to report the number of complaints per 1,000 handsets or lines. 47 C.F.R. § 54.313(a)(4) requires an ETC to report the number of complaints per 1,000 connections in the prior calendar year. T-Mobile submits as Confidential Attachment H its complaints per 1,000 handsets report for year 2011. In accordance with Standard C(4) of the *ETC Requirements Order* and 47 C.F.R. § 54.313(a)(4), T-Mobile will continue to assist customers in an effort to resolve all customer concerns and complaints in 2012 and beyond.

F. Certification Regarding Applicable Service Quality Standards and Consumer Protection Rules

Standard C(5) of the *ETC Requirements Order* and 47 C.F.R. § 54.313(a)(5) require an ETC to certify that it is complying with applicable service quality standards and consumer protection rules. For a wireless ETC, compliance with the CTIA-The Wireless Association's® ("CTIA") Consumer Code for Wireless Service ("Consumer Code")⁸ meets this requirement. Attachment I is a copy of T-Mobile's most recent certification of the Consumer Code from

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.

CTIA. In addition, included in Attachment B is T-Mobile's certification that it is complying with applicable service quality standards and consumer protection rules.

G. Description of Applicant's Local Usage Plan and that of the ILEC

Standard C(6) of the *ETC Requirements Order* requires an ETC to provide a description of its local usage plan(s) to demonstrate comparability with the incumbent LEC's offerings. In addition, 47 C.F.R. § 54.313(a)(7) requires an ETC to provide its price offerings in a format as specified by the FCC Wireline Competition Bureau ("WCB"). T-Mobile makes available several different rate plans with varying amounts of intra and interstate usage, various 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 Attachment J. T-Mobile will amend this list to comply with any later WCB guidance to the extent required or requested to do so.

V. IDAHO TELEPHONE SERVICE ASSISTANCE PROGRAM (ITSAP) REPORTS

A. ITSAP Recipients

Included as Confidential Attachment K is T-Mobile's report including the number of T-Mobile Idaho Lifeline or ITSAP subscribers.

B. ITSAP Offerings

T-Mobile makes available to qualified low-income consumers a discounted, facilities-based service offering that meets all applicable Lifeline requirements. T-Mobile's traditional Lifeline offering in Idaho includes:

- a low \$19.99 per month base rate less the applicable Lifeline discount of \$13.50, resulting in a low monthly Lifeline discounted rate of \$6.49;⁹
- 145 Whenever minutes[®], 500 night minutes, and 500 weekend minutes per month;¹⁰
- additional minutes priced at \$0.05 per minute; and
- an affordable handset.

T-Mobile's traditional Lifeline offering provides consumers additional benefits. For example, calls to 911 and customer service (dialing 611 from the mobile handset) are free calls, regardless of whether the customers have sufficient remaining minutes available in their account, and those calls will not be deducted from the monthly included minutes or charged as additional minutes. Additionally, qualified consumers who subscribe to T-Mobile's Lifeline offering are not charged a fee to recover federal universal service fund contributions or other non-tax related government-related surcharges (including the fee for the cost of local number portability). In addition to voice services, T-Mobile's Lifeline customers (like all of its customers) also have access to a variety of other standard features at no additional charge, including voice mail, caller identification, and call-waiting services.

T-Mobile also currently makes available to Lifeline subscribers a \$10.00 discount on certain plans (monthly 4G and Walmart Family Mobile) that are generally available to the public. See <https://lifeline.t-mobile.com/> and <https://lifeline.myfamilymobile.com/>.

In accordance with 47 C.F.R. § 54.401(b), T-Mobile may modify which offerings are made available to qualifying low-income consumers, consistent with all applicable requirements.

⁹ T-Mobile is applying to its traditional Lifeline offering the new flat rate, interim Lifeline support amount of \$9.25 plus \$0.75 carrier additive that it will pass through to consumers (but not seek reimbursement for), and \$3.50, which is the maximum of state support available in the states where T-Mobile offers Lifeline service (but does not seek reimbursement for), for a total discount of \$13.50. See 47 C.F.R. § 54.403(a) (as amended by the *Lifeline Reform Order*).

¹⁰ Whenever minutes[®] are minutes that can be used at anytime and anywhere on T-Mobile's nationwide network. Weekend minutes are currently defined as midnight Friday to midnight Sunday, and nights are currently defined as 9:00 p.m. to 6:59 a.m. Monday-Friday, based on the start time of call.

VI. ADDITIONAL FCC REQUIREMENTS

A. Certification Regarding Ability to Remain Functional in Emergency Situations

47 C.F.R. § 54.313(a)(6) requires an ETC to certify that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2). T-Mobile plans for emergency situations by making capital improvements to the network, by undertaking preventative maintenance, training personnel, and continually monitoring its network elements. In particular, T-Mobile complies with 47 C.F.R. § 54.202(a)(2), which sets forth three (3) areas of demonstration with respect to remaining functional in an emergency situation: back-up power to ensure a functioning network; network redundancy for rerouting; and how traffic spikes are addressed.

1. Back-Up Power

T-Mobile has fixed and portable back-up power generators located at various network locations that it can deploy in emergency situations. 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.

2. Ability to Reroute Traffic Around Damaged Facilities

T-Mobile has the ability to reroute traffic around damaged out-of-service facilities through the deployment of cells-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.

3. Ability to Manage Traffic Spikes During Emergency Periods

T-Mobile has a network control center that monitors network traffic, anticipates traffic spikes, and can: (i) deploy network facilities to accommodate capacity needs; (ii) change call

routing translations; and (iii) deploy COWs to temporarily meet traffic needs until more durable solutions, such as additional capacity and antenna towers, can be deployed.

Included in Attachment B is T-Mobile's certification regarding its ability to remain functional in emergency situations.

VII. CONCLUSION

Based on the foregoing information, T-Mobile respectfully requests the Commission certify to the FCC and USAC that T-Mobile continues to be eligible to receive federal universal service support.

Dated this 31st day of August, 2012.

Respectfully submitted,

T-Mobile West LLC

By: 

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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 COMMUNICATIONS	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	Study Area Code (SAC)	Wire Center
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
		KTCHIDMA
		KUN AidMA
		LHSPIDMA
		LSMNIDMA

IDAHO
ETC SERVICE AREA

Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
		MCCMIDMA
		MDTNIDMA
		MELBIDMA
		MRDNIDMA
		MRTGIDMA
		MTHOIDMA
		MTHOISO
		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

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of)	Docket No. _____
)	
T-MOBILE WEST LLC)	APPLICATION FOR CERTIFICATION AS
)	AN ELIGIBLE TELECOMMUNICATIONS
For Certification as an Eligible)	CARRIER IN THE STATE OF IDAHO
Telecommunications Carrier in the State of)	
Idaho)	

ANNUAL CERTIFICATIONS

I am H. Skip Cornett, Vice President of Tax for T-Mobile USA, Inc., which is the parent company of and controls T-Mobile West LLC (hereinafter "T-Mobile") in this matter. I submit this certification in support of T-Mobile's petition for certification as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934 ("petition").

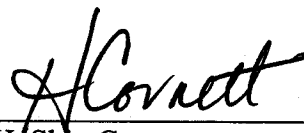
In my capacity as Vice President of Tax for T-Mobile, I have general knowledge regarding its operation of commercial mobile radio services ("CMRS") in the State of Idaho, and its qualifications and abilities to provide CMRS-based Universal Service consistent with this petition. I certify that, to the best of my knowledge and belief, T-Mobile:

1. did in 2011 and will in 2013 use its **HIGH-COST SUPPORT** only for the provision, maintenance and upgrading of facilities and services within the service area described in Attachment A to the referenced Petition for which support is intended, consistent with Section 254(e) of the Communications Act, 47 U.S.C. § 254(e);

2. complies with the applicable service quality standards required by the Commission (specifically, CTIA-The Wireless Association's® Consumer Code for Wireless Service); and,
3. is able to function in emergency situations.

I am authorized to make this certification on behalf of T-Mobile.

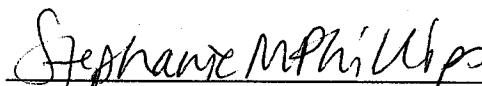
Signed,



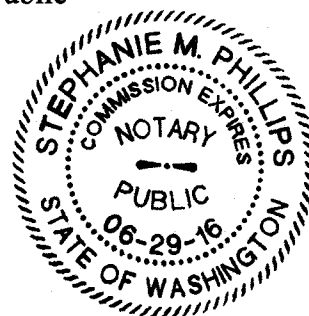
H. Skip Cornett
Vice President, Tax
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006

STATE OF WASHINGTON
COUNTY OF KING

Acknowledged before me this 28th day of August, 2012 by H. Skip Cornett, as Vice President, Tax of T-Mobile USA, Inc. who is personally known to me or produced identification and who did take an oath.



Notary Public



**T-Mobile Annual Certification
2012
Confidential Attachment C**

**This page allegedly contains trade secrets or
confidential material and is separately filed.**

**T-Mobile Annual Certification
2012
Confidential Attachment D**

**This page allegedly contains trade secrets or
confidential material and is separately filed.**

**T-Mobile Annual Certification
2012
Confidential Attachment E**

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