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IDAHO PUBLIC
UTILITIES COMMISSION

November 4, 2014

**VIA EMAIL – jean.jewell@puc.idaho.gov
and
UPS OVERNIGHT DELIVERY**

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
PO Box 83720
472 West Washington
Boise, ID 83702-0074

Re: T-Mobile West LLC – Notice of Relinquishment– Docket No. TMW-T-10-01

Dear Ms. Jewell:

On behalf of T-Mobile West LLC, enclosed for filing are an original and seven copies of T-Mobile West LLC'S Notice of Relinquishment of its Eligible Telecommunication Carrier Designation pursuant to 47 U.S.C. §214(e)(4).

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trinchero

MPT/jan

Enclosure

cc: Service List

DWT 25268238v1 0048172-000324

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of)
)
T-MOBILE WEST CORP.)
)
For Designation as an Eligible)
Telecommunications Carrier)
_____)

Docket No. TMW-T-10-01

T-MOBILE WEST LLC'S NOTICE OF RELINQUISHMENT
OF ITS ELIGIBLE TELECOMMUNICATION CARRIER DESIGNATION
PURSUANT TO 47 U.S.C. §214(e)(4)

Dated: November 4, 2014

DAVIS WRIGHT TREMAINE LLP
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Bellevue, WA 98006
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Email: Teri.Ohta@t-mobile.com

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of)	
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T-MOBILE WEST CORP.)	Docket No. TMW-T-10-01
)	
For Designation as an Eligible)	
Telecommunications Carrier)	
_____)	

**T-MOBILE WEST LLC’S NOTICE OF RELINQUISHMENT
OF ITS ELIGIBLE TELECOMMUNICATION CARRIER DESIGNATION
PURSUANT TO 47 U.S.C. §214(e)(4)**

Pursuant to 47 U.S. C. §214(e)(4), 47 C.F.R. § 54.205(a), T-Mobile West LLC (hereinafter, “T-Mobile” or the “Company”) hereby submits this notice of relinquishment of its eligible telecommunications carrier (“ETC”) designation in the State of Idaho, effective as of December 31, 2014. As explained herein, this relinquishment of T-Mobile’s ETC designation meets all applicable requirements and should be expeditiously granted.

I. COMMUNICATIONS REGARDING THIS NOTICE

All pleading, correspondence and communications regarding this Notice should be addressed as follows:

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T-MOBILE USA, INC.
Teri Y. Ohta
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12920 SE 38th Street
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II. BACKGROUND

On August 9, 2011, the Commission designated T-Mobile as an ETC for purposes of receiving federal high cost and low income (or Lifeline) universal service support in the wire

centers listed in Exhibit A (“the ETC Service Area”).¹ Subsequent to being designated an ETC in Idaho, T-Mobile has filed annually with the Commission ETC Certification Reports, pursuant to Order Nos. 29841 and 32319, and the Commission has certified T-Mobile to the Federal Communications Commission (“FCC”) each year to date.

III. T-MOBILE’S REQUEST FOR RELINQUISHMENT OF ITS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

As an ETC eligible to receive both federal high cost and low income (or Lifeline) universal service support in Idaho, T-Mobile has utilized high cost universal service support to improve its network and make Lifeline discounted services available to eligible consumers. T-Mobile now wishes to relinquish its ETC designation in Idaho, effective December 31, 2014. While T-Mobile will no longer receive high cost universal service support, or reimbursement for Lifeline discounts after the effective date of its relinquishment, it will continue to provide wireless service in Idaho as a non-ETC, meaning that existing and future subscribers can continue to receive wireless service from T-Mobile.

A. T-Mobile’s Relinquishment of ETC Designation Complies With Federal Law

The Commission “shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier.” 47 U.S.C. section 214(e)(4) states in relevant part:

(4) Relinquishment of universal service

A State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications

¹ *In the Matter of the Application of T-Mobile West Corp. for Designation as an Eligible Telecommunications Carrier*, Docket No. TMW-T-10-01, Order No. 32319 (hereinafter “the *Designation Order*”). 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.

carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission (or the Commission in the case of a common carrier designated under paragraph (6)) shall establish a time, not to exceed one year after the State commission (or the Commission in the case of a common carrier designated under paragraph (6)) approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

In summary, the statutory requirements for relinquishing ETC designation are: (1) there must be more than one ETC serving in the area of the ETC seeking relinquishment; (2) the ETC seeking relinquishment must provide advance notice to the relevant state commission; (3) the customers served by the relinquishing ETC must continue to be served by an ETC; and (4) to the extent that additional facilities are required to serve any of the relinquishing ETC's customers, sufficient notice shall be provided to ensure that the construction or purchase can be timely completed. The relevant FCC rule essentially reiterates the same requirements.²

T-Mobile's application for relinquishment of its ETC designation in Idaho complies with federal law and must be granted because: (1) there is currently more than one ETC serving the ETC Service Area; (2) T-Mobile is providing advance notice to the Commission of such relinquishment; (3) T-Mobile will continue providing service to its customers, and additionally,

² 47 C.F.R. § 54.205(a).

the remaining high cost ETCs in the market should be able to serve the universal service needs of consumers within their respective designated service areas that cover the ETC Service Area; and (4) no additional facilities will need to be purchased or constructed by the remaining ETCs.

1. There Is More Than One ETC Currently Serving the ETC Service Area

T-Mobile's ETC Service Area is currently served by more than one ETC.³ Because at least one other ETC (in addition to T-Mobile) serves in T-Mobile's ETC Service Area, applicable federal law requires the Commission to permit T-Mobile to relinquish its ETC designation.

2. T-Mobile Is Providing Advance Notice to the Commission

Consistent with 47 U.S.C. §214(e)(4) and 47 C.F.R. § 54.205(a), T-Mobile is filing this notice over one and a half months in advance of the requested effective date of relinquishment of its ETC designation. This advance notice satisfies the requirement to provide advance notice to the Commission of T-Mobile's intent to relinquish its ETC designation.

3. Both T-Mobile and the Remaining ETCs Will Serve Consumers

T-Mobile will continue to serve customers throughout the ETC Service Area, providing uninterrupted service upon the effective date of its relinquishment of its ETC designation. To the best of T-Mobile's knowledge, the ILEC ETCs and CETCs in the ETC Service Area will also continue to serve customers in the ETC Service Area. Thus, all customers within T-Mobile's ETC Service Area will continue to be served by an ETC, consistent with 47 U.S.C. § 214(e).

T-Mobile has approximately 70 Lifeline customers in Idaho. Following relinquishment of its ETC designation, effective December 31, 2014, T-Mobile will provide notice to the former

³ See Exhibit A. T-Mobile's ETC service area includes wire centers served by incumbent local exchange carriers ("ILECs"), all of which are ETCs. In addition, a number of the wire centers in T-Mobile's ETC Service Area are also within the ETC service areas of other wireless competitive ETCs ("CETCs").

T-Mobile Lifeline customers that it no longer participates in the Lifeline program. The notice will inform these customers that they will receive courtesy credits in the amount of their Lifeline discount for 45 days. After that period of time, these customers may select an alternative calling plan from T-Mobile or they may obtain discounted Lifeline service from another provider. If a former T-Mobile Lifeline customer decides to obtain service from another provider, T-Mobile will not impose an early termination fee on such customer.

4. No Additional Facilities Will Need to Be Purchased or Constructed by the Remaining Eligible Telecommunications Carriers

To the best of T-Mobile's knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within the ETC Service Area. Because the remaining ETCs currently serve the entire area in which T-Mobile is designated as an ETC in Idaho, the Commission need not provide notice to these carriers to permit them to purchase or construct facilities to ensure that T-Mobile's customers will continue to receive service.

Through this notice, T-Mobile has complied with all requirements of 47 U.S.C. §214(e)(4) and 47 C.F.R. § 54.205. There is no barrier to prevent T-Mobile from relinquishing its ETC designation in Idaho. Therefore, the Commission should accept T-Mobile's notice of relinquishment.

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IV. CONCLUSION

Consistent with all applicable requirements, T-Mobile respectfully requests the Commission expeditiously accept T-Mobile's notice of relinquishment of its ETC designation in Idaho effective December 31, 2014. T-Mobile has demonstrated that it meets the requirements for relinquishment of its ETC designation.

Dated this 4th day of November, 2014.

Respectfully submitted,

T-Mobile West LLC

By: _____


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Attachment A
T-Mobile Idaho ETC Service Area

Telco Company Name	Wirecenter
ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ALBNIDXC ALMOIDXC ARCOIDXC ELBAIDXC HLBKIDXC HOWEIDXC MALTIDXC MCKYIDXC MLCYIDXC MOORIDXC RFRVIDXC
CENTURY-GEM STATE-ID	BRUNIDXC GRVWIDXC RCFDIDXC
CENTURYTEL OF IDAHO, INC.	LEDRIDXC NFRKIDXC SLMNIDXC
CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	ABRIDXC CARYIDXC CSCDIDXC DNLYIDXC EKCYIDXA FRFDIDXC GRVYIDXC HMDLIDXC HRBNIDXC MCCLIDXC MRNGIDXC NWMDIDXC PARMIDXC RGNSIDXC SPFDIDXC SWETIDXC WHBRIDXX WLDRIDXC
FARMERS MUTUAL TELEPHONE CO.	FRLDIDXX NUARIDXC
FILER MUTUAL TELEPHONE CO.	FILRIDAA HLSTIDXC
FREMONT TELCOM CO	STATIDMA
MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	DUBSIDXC HAMRIDXC KLGRIDXC MNVWIDXC TRTNIDXC
POTLATCH TELEPHONE CO., INC.	JLTTIDXA KNDRIDXX

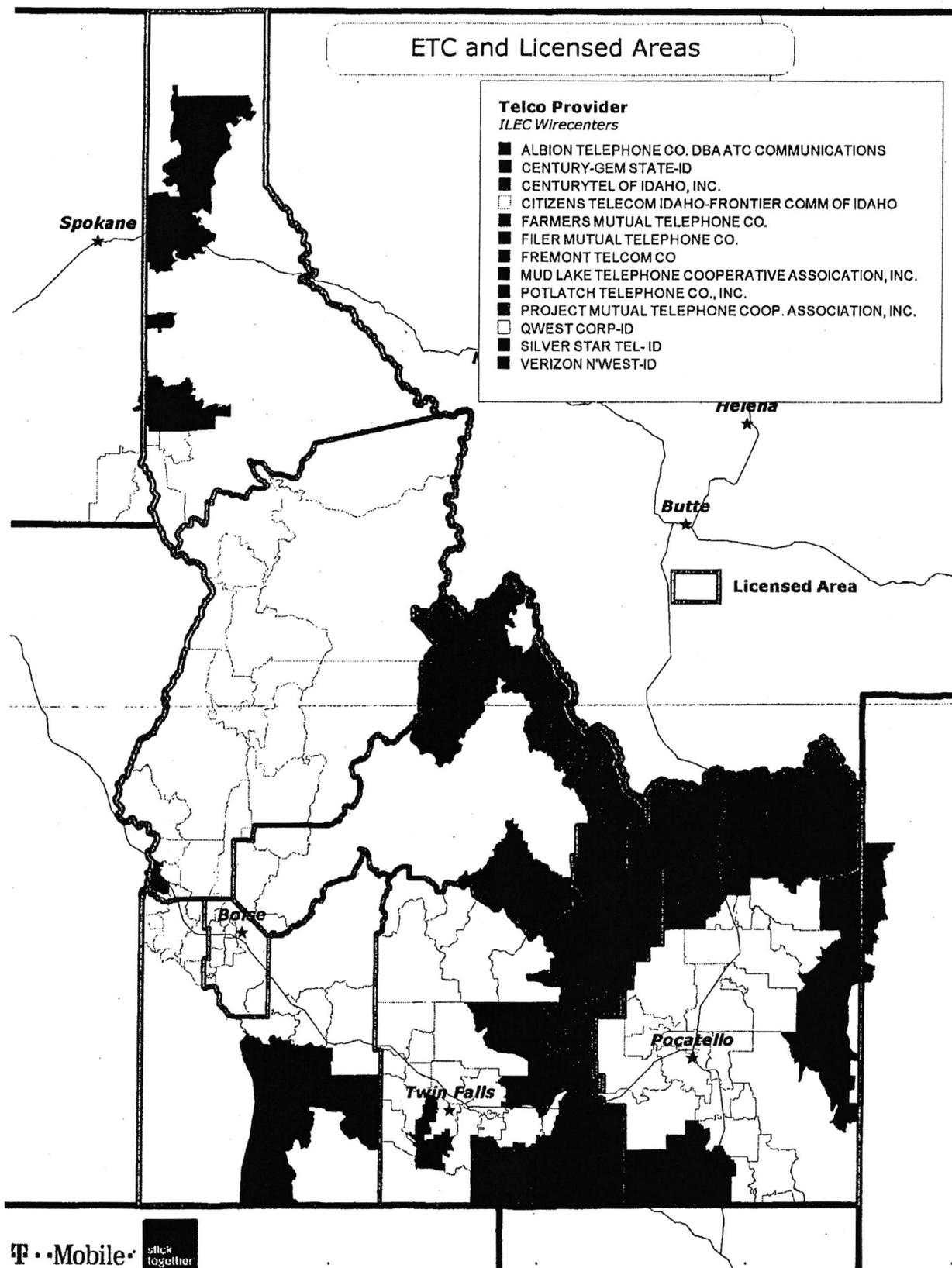
T-Mobile Idaho ETC Service Area

PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	TROYIDXX MNDKIDXC NRLDIDXC OKLYIDXC PAULIDXC RPRTIDXC
QWEST CORP-ID	AMFLIDMA BLFTIDMA BLSSIDMA BOISIDMA BOISIDNW BOISIDSW BOISIDWE BRLYIDMA BUHLIDMA CLWLIDMA CSFRIDMA DECLIDMA DWNYIDMA DYTIDMA EAGLIDNM EDHZIDMA EMMTIDMA FKLIDMA FRTHIDMA GDNGIDMA GLFYIDMA HALYIDMA HGMNIDMA IDFLIDMA INKMIDMA JERMIDNM KMBRIDMA KTCHIDMA KUNIDMA LHSPIDMA LSMNIDMA MCCMIDMA MDTNIDMA MELBIDMA MRDNIDMA MRTGIDMA MTHOIDMA MTHOISO NMPAIDMA NPMOIDMA PCTLIDMA PCTLIDNO

T-Mobile Idaho ETC Service Area

	PSTNIDMA PYTTIDMA RBRTIDMA RGBYIDMA RIRIIDMA RVSDIDMA RXBGIDMA SHLYIDMA SHSHIDMA STARIDNM TWFLIDMA WESRIDMA WNDLIDMA LAPWID01 LSTNIDSH
SILVER STAR TEL- ID	DRGSIDMA IRWNIDXC WAYNIDXC
VERIZON N'WEST-ID	BYVWIDXX CRALIDXX GENSIDXX HYLKIDXX MSCWIDXX PSFLIDXX RTHDIDXX SNPNIDXX

ETC and Licensed Areas



CERTIFICATE OF SERVICE

I hereby certify that, on November 4, 2014, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document upon:

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street PO Box 83720 Boise, ID 83720-0074 jean.jewell@puc.idaho.gov	Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Fax <input type="checkbox"/> UPS <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>
Cynthia A. Melillo, Esq. cam@camlawidaho.com	Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Fax <input type="checkbox"/> UPS <input type="checkbox"/> Email <input checked="" type="checkbox"/>
Dean J. Miller McDevitt & Miller LLP PO Box 2564-83701 Boise, ID 83702 joe@mcdevitt-miller.com	Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Fax <input type="checkbox"/> UPS <input type="checkbox"/> Email <input checked="" type="checkbox"/>



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