



**Sharon Mullin**  
Director  
External Affairs

2003 Point Bluff  
Austin, TX 78746

T: 512-330-1698  
F: 832 213-0203  
smullin@att.com

September 15, 2014

**VIA E-Filing and Overnight Mail**

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem, OR 97302-1166

**RE: Docket No. UM 1688  
FCC Form 481, Carrier Annual Reporting Data Collection Form  
Amendment to add Outage information  
Cricket Communications**

Dear Filing Center:

Pursuant to section 54.313(i) of the Federal Communications Commission's ("FCC's") rules on June 30, 2014,<sup>1</sup> Cricket Communications, Inc. ("Cricket") filed with the Oregon Public Utility Commission a copy of the Form 481, Carrier Annual Reporting Data Collection Form that it filed with the FCC. In accordance with the Second Partial Stipulation in Docket UM-1648, Cricket included in its Oregon filing all of the information specified in 47 CFR § 54.422(b); however, Cricket inadvertently did not attach the outage report required by the Second Partial Stipulation in Docket UM-1648. Cricket is now filing its Oregon-specific outage report required in Docket UM-1648. Cricket apologizes for this oversight.

The outage report contains confidential information. As such, enclosed for filing in the above referenced docket are an original and two copies, with the confidential information being submitted on yellow paper in a sealed envelope and marked "Confidential". The Cricket report contains an Exhibit which includes Service Outage Reporting data, which is being filed as confidential pursuant to OAR 860-001-0080. The confidential data is exempt from disclosure under the Oregon Public Records law, ORS 192.410 to 192.505.

Cricket's report of outages in the attached exhibit is also highly proprietary and its disclosure could cause competitive harm to the company as well as providing information that would reveal or otherwise identify potential weakness in the telecommunications system that could be taken advantage of. (See ORS §192.501(23)). If a competitor accessed information regarding the number and duration of the company's outages, and the company's response to outages, the competitor could gain an enhanced understanding of the competitor's infrastructure and technology, including its relatively strong and weak points. Further, similar outage information is afforded confidential protection by the FCC pursuant to 47 C.F.R. §4.2 for a number of reasons including those regarding security of the telecommunications network.

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<sup>1</sup> 47 C.F.R. § 54.313(i).

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

Sincerely,

*Sharon Mullin*  
Sharon Mullin