

**DOCKET NO. UM 1822**

**Cover Sheet for Submission of  
2017 Annual ETC Certification Reports**

Name of Eligible Telecommunications Carrier: AT&T Mobility LLC

Filing date: June 29, 2017

Is this: Original submission?   
OR  
Revised submission? \_\_\_\_\_

Person to contact for questions:

Name Sharon Mullin

Phone number 512-330-1698

E-mail address smullin@att.com

Documents included in this filing (please check applicable items):

- \_\_\_\_\_ CAF/ICC Support (47 CFR § 54.304)
- \_\_\_\_\_ Rate Floor Data (47 CFR § 54.313(h))
- Form 481 (High-cost per 47 CFR § 54.313, Low-income per 54.422)<sup>1</sup>
- \_\_\_\_\_ HUBB Portal Broadband Information<sup>2</sup>
- \_\_\_\_\_ Form 690 (Mobility Fund per 47 CFR § 54.1009)
- Affidavit for High-Cost Support

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**Filing deadlines:** The Oregon deadlines for filing items required by 47 CFR § 54 are the same as the deadlines for filing with the FCC. The notarized affidavit for high-cost support must be filed no later than the due date for the FCC Form 481. Based on current information, it appears that all items other than CAF/ICC support data are due by July 3, 2017. The CAF/ICC support data is due on the same day as the ETC's interstate access tariff filing (see FCC DA 17-258 for dates).

<sup>1</sup> Lifeline-only ETCs must provide all information specified in 47 CFR § 54.422(b) even if the ETC does not submit this information to the FCC.

<sup>2</sup> Federal Price Cap carriers only.

## DOCKET NO. UM 1822

If revisions to an original submission are filed with the FCC or USAC, a copy of the revisions must be filed with the Oregon Commission no later than five business days following submission to the FCC or USAC.

### FILING INSTRUCTIONS

Please file submissions for this year in Docket No. UM 1822. Include this cover sheet with each filing to indicate which documents are included. Please fill in all relevant items of information on the cover sheet.

Filings must be electronically submitted to the PUC Filing Center. You may e-mail documents to [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us). Please note that the upload process is no longer an option for filing. See the PUC website for further instructions. If selected portions of documents are to receive confidential treatment, those portions should not be filed electronically. You may electronically file redacted versions of documents containing confidential information, but then follow-up by sending full versions including confidential information printed on yellow paper.

***After filing electronically, please send two hard copies of the filing package (cover sheet and filed information) to the PUC Filing Center.*** Be sure to include the original affidavit with the raised seal or notary's mark evident. Hard copies of confidential material should be filed in accordance with confidential designation requirements described in OAR 860-001-0070.

Regular delivery methods may be used to send all hard copy documents; overnight or express delivery is not necessary. Please send hard copy documents to the Filing Center via US mail using the following post office box address:

Public Utility Commission of Oregon  
Attn: Filing Center  
PO Box 1088  
Salem, OR 97308-1088

If you send hard copy documents via means other than the US Postal Service, use the following address:

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301

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If you have any questions regarding the reporting requirements, please contact Kay Marinos at 503-378-6730 or send an e-mail to [Kay.Marinos@state.or.us](mailto:Kay.Marinos@state.or.us).



**Sharon Mullin**  
Director  
Regulatory

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Austin, TX 78746

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F: 832 213-0203  
[smullin@att.com](mailto:smullin@att.com)

June 29, 2017

**Via E-Filing and Overnight Mail**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St SE Suite 100  
Salem, OR 97301

**RE: Docket No. UM 1822  
FCC Form 481, Carrier Annual Reporting Data Collection Form  
AT&T Mobility LLC**

Dear Filing Center:

Pursuant to section 54.313(i) of the Federal Communications Commission's ("FCC's") rules<sup>1</sup> and Order 15-169 of the Public Utility Commission of Oregon ("Commission"), AT&T Mobility LLC hereby provides a copy of its FCC Form 481, Carrier Annual Reporting Data Collection Form that it filed with the FCC on June 23, 2017. All eligible telecommunication carriers that receive high-cost and/or low income support must file Form 481 with the FCC and this Commission by July 1 in order to continue receiving such support.

The collection of data and information contained in FCC Form 481 is done under the FCC's authority in section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254, and sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422. The FCC anticipates that state commissions will use the data contained in carriers' FCC Form 481 filings to develop their section 54.314 certifications.<sup>2</sup>

The Company's 481 filing 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 AT&T Mobility Reports contain an Exhibit which includes Service Outage Reporting data, which is being filed as confidential pursuant to OAR 860-001-0070. The confidential data is exempt from disclosure under the Oregon Public Records law, ORS 192.410 to 192.505.

The document that AT&T Mobility claims is confidential is labeled as "Line 200 Attachments", which includes service Outage Reporting data including customer impact counts and resolution information not available to the public. AT&T Mobility's Line 200 Report of Outages is highly

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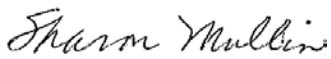
<sup>1</sup> 47 C.F.R. § 54.313(i).

<sup>2</sup> See 47 C.F.R. § 54.314(a); *Connect America Fund*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶ 612 (2011).

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.

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

Sincerely,

  
Sharon Mullin

AFFIDAVIT CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, Michael Maxwell, being of lawful age and duly sworn, on my oath, state that I am the Vice President/General Manager, Pacific Northwest of AT&T Mobility Corporation, the manager of AT&T Mobility LLC and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

Pursuant to the requirements of the Federal Communications Commission, 47 C.F.R. § 54.314, AT&T Mobility LLC hereby certifies to the Public Utility Commission of Oregon that it is eligible to receive federal high-cost support for the program years cited.


I attest that all federal high-cost support provided to AT&T Mobility LLC in Oregon was used in the preceding calendar year (2016) and will be used in the coming calendar year (2018) only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

DATED this 26 day of June, 2017.

By:  (*Officer's Name*)

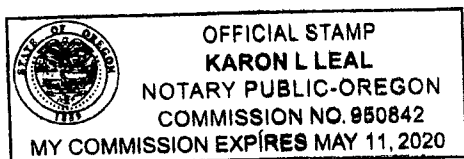
Its: Vice President/General Manager – Pacific Northwest (*Officer's Title*)

SUBSCRIBED AND SWORN to before me this 26 day of June, 2017.



Notary public in and for the State of OREGON

My Commission Expires: 5-11-2020





Cathy Carpino  
Assistant Vice President -  
Senior Legal Counsel

AT&T Services, Inc.  
1120 20th Street NW, Suite 1000  
Washington, D.C. 20036  
Phone 202 457-3046  
[cathy.carpino@att.com](mailto:cathy.carpino@att.com)

June 23, 2017

**Accepted / Filed**

JUN 23 2017

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**Re: REQUEST FOR CONFIDENTIAL TREATMENT; WC Docket No. 14-58; FCC Form 481 – Carrier Annual Reporting Data Collection Form (Sections 54.313 and 54.422 Annual Reporting) for the following high-cost recipients:**

**AT&T Mobility, LLC (SACs 259908, 389015, 399015, 529910, 539010), AT&T Mobility Puerto Rico, Inc. (SAC 639005); New Cingular Wireless PCS, LLC (SACs 209012, 269905, 279010, 289912, 319026, 409004, 449022, 479006, 619004)**

Pursuant to the Commission's decision in *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, GC Docket No. 96-55 (FCC 98-184), released Aug. 4, 1998 ("*Confidential Information Order*") and in accordance with the Freedom of Information Act ("FOIA") and the Commission's Rules related to public information and inspection of records, e.g. 47 C.F.R. §§ 0.457 and 0.459, AT&T Services, Inc. ("AT&T"), on behalf of itself and its affiliates AT&T Mobility, LLC; AT&T Mobility Puerto Rico, Inc.; and New Cingular Wireless PCS, LLC (collectively, "AT&T Mobility"), hereby submits this request for confidential treatment of certain information submitted to the Commission in AT&T Mobility's FCC Form 481 filings, made in accordance with 47 C.F.R. § 54.313. This request applies to all Line 200 (Voice Outage Reporting) related attachments submitted herewith to the Commission.

**Statement pursuant to 47 C.F.R. § 0.459(b)**

**(1) Identification of the specific information for which confidential treatment is sought.**

Confidential Line 200 attachments are confidential commercial information under Exemption 4 of the FOIA, 47 U.S.C. § 552(b)(4). Accordingly, pursuant to Commission Rule 0.459(a), AT&T requests that such information not be made routinely available for public inspection. Confidential Line 200 attachments contain highly sensitive network outage information required by 47 C.F.R. §54.313(a)(2). Commission Rule 54.313(a)(2) was modeled on the outage reporting requirements in 47 C.F.R. Part 4. When it adopted the Part 4 reporting requirements,

the Commission found that such data present national security and competitive concerns and should be deemed confidential when filed with the Commission. *New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830, ¶ 3 (2004) (“This data, though useful for the analysis of past and current outages in order to increase the reliability and security of telecommunications networks in the future, could be used by hostile parties to attack those networks, which are part of our Nation’s critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity. We therefore will treat the information that will be provided as confidential.”). The information in Confidential Line 200 attachments are entitled to be treated as confidential for these same reasons.

**(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.**

The information is being provided to the Commission in response to Commission rule 47 C.F.R. § 54.313 and the Commission’s *USF/ICC Transformation Order*, 26 FCC Rcd 17663 (2011).

**(4) Explanation of the degree to which the information concerns a service that is subject to competition; and**

The information being provided to the Commission concerns the various interstate and intrastate telecommunications services provided by AT&T Mobility in competition with other CMRS and wireline providers. Telecommunications, in particular, mobile telecommunications, is a highly competitive industry, and AT&T’s mobile services are subject to significant competition throughout the country. The presence of such competition and the likelihood of competitive injury threatened by release of the information provided to the Commission by AT&T should compel the Commission to withhold the information from public disclosure. *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1152 (D.C. Cir. 1987); *Frazer v. U.S. Forest Service*, 97 F.3d 367, 371 (9<sup>th</sup> Cir. 1996); *Gulf & Western Indus. v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).

**(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.**

**(5) Explanation of how disclosure of the information could result in substantial competitive harm.**

Exemption 4 requires a federal agency to withhold from public disclosure confidential or privileged commercial and financial information of a person unless there is an overriding public interest requiring disclosure, and the Commission has a longstanding policy of protecting the confidential commercial information of its regulatees under FOIA Exemption 4.

Two lines of cases have evolved for determining whether agency records fall within Exemption 4. Under *Critical Mass*, commercial information that is voluntarily submitted to the Commission must be withheld from public disclosure if such information is not customarily disclosed to the

public by the submitter.<sup>1</sup> For materials not subject to *Critical Mass*, *National Parks* establishes a two part test for determining if information qualifies for withholding under Exemption 4.<sup>2</sup> The first prong asks whether disclosing the information would impair the government's ability to obtain necessary information in the future. The second prong asks whether the competitive position of the person from whom the information was obtained would be impaired or substantially harmed. If the information meets the requirements of either prong, it is exempted from disclosure under Exemption 4. Whether under *Critical Mass* or *National Parks*, the information provided by AT&T falls within Exemption 4.

The information being provided to the Commission in response to the Commission's rules is not customarily released to the public, is maintained on a confidential basis, and is not ordinarily disclosed to parties outside the company. Disclosure of this information would subject AT&T Mobility to substantial competitive harm.

Competitors could use the confidential information to assist in targeting their service offerings and enhancing their competitive positions, to the detriment of the competitive position of AT&T Mobility. See, e.g., *GC Micro Corp. v. Defense Logistics Agency*, 33 F.3d 1109 (9<sup>th</sup> Cir. 1994).

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure; and**
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

This information has been maintained on a confidential basis within AT&T and would not ordinarily be disclosed to parties outside the company. Company practices instruct employees not to disclose such information outside the company and restrict such access to this information pursuant to a nondisclosure agreement.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.**

The material must be kept confidential for an indefinite period. Confidential treatment must be afforded this information as long as it would provide a basis for AT&T Mobility's competitors to gain insight into its business operations. AT&T cannot determine at this time any date on which the information would become "stale" for such a purpose.

## **Conclusion**

For all the foregoing reasons AT&T requests that the Commission withhold from public disclosure pursuant to section 0.459 of the Commission's Rules the proprietary commercial

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<sup>1</sup> *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) ("*Critical Mass*").

<sup>2</sup> *National Parks & Conservation Assoc. v. Morton*, 498 F.2d 765 D.C. Cir. (1974) ("*National Parks*").



information contained in Confidential Line 200-related attachments. If the Commission is unable for any reason to keep this information confidential, AT&T respectfully requests that the Commission return the information to AT&T pursuant to section 0.459(e) of the Rules.

Sincerely,

/s/ Cathy Carpino  
Cathy Carpino

Attachments

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	539010
<015> Study Area Name	AT&T Mobility
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Mary Henze (OR)
<035> Contact Telephone Number: Number of the person identified in data line <030>	2024572041 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	mh3376@att.com
Form Type	54.313 and 54.422



**(300) Unfulfilled Service Request  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	539010
<015> Study Area Name	AT&T Mobility
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035> Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

539010OR310.pdf

\_\_\_\_\_  
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

\_\_\_\_\_  
Name of Attached Document

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only mobile voice
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	0.2895
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<440>	Complaints per 1000 customers for fixed broadband	
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		539010OR510 .pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	539010OR610.pdf









**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	539010
<015> Study Area Name	AT&T Mobility
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035> Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, Confederated Tribes of Siletz Reservation, Confederated Tribes of Warm Springs Reservation, Coquille Cow Creek Band of Umpqua Indians, and Coquille Tribe

<920> Tribal Government Engagement Obligation

539010OR920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

<1000> Voice services rate comparability certification Not Applicable

<1010> Attach detailed description for voice services rate comparability compliance

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Name of Attached Document

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

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Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://www.wireless.att.com/learn/articles-resources/community-support/lifeline-link-up.jsp>

“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

<b>(2005) Price Cap Carrier Additional Documentation</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	July 2013

<b>&lt;010&gt;</b>	Study Area Code	539010
<b>&lt;015&gt;</b>	Study Area Name	AT&T Mobility
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<b>&lt;2011&gt;</b> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input style="width: 100px; height: 20px;" type="text"/>	
<b>&lt;2022&gt;</b> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<b>&lt;2023&gt;</b> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<b>&lt;2024A&gt;</b> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<b>&lt;2024B&gt;</b> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<b>&lt;2025A&gt;</b> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<b>&lt;2025B&gt;</b> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	<input style="width: 100px; height: 20px;" type="text"/>	Name of Attached Document Listing Required Information
<b>&lt;2015&gt;</b> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100px; height: 20px;" type="text"/>

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan  
 Carrier certifies to 54.313(f)(1)(iii)

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

<b>(3005) Rate Of Return Carrier Additional Documentation (Continued)</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<b>&lt;010&gt; Study Area Code</b>	539010
<b>&lt;015&gt; Study Area Name</b>	AT&T Mobility
<b>&lt;020&gt; Program Year</b>	2018
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Mary Henze (OR)
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	2024572041 ext.
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	mh3376@att.com

**Financial Data Summary**

(3027) Revenue	<input type="text"/>
(3028) Operating Expenses	<input type="text"/>
(3029) Net Income	<input type="text"/>
(3030) Telephone Plant In Service(TPIS)	<input type="text"/>
(3031) Total Assets	<input type="text"/>
(3032) Total Debt	<input type="text"/>
(3033) Total Equity	<input type="text"/>
(3034) Dividends	<input type="text"/>

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

**If yes to 4003A, please provide a response for 4003B.**

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

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**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information

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**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information

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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	AT&T Mobility
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/20/2017</span>
Printed name of Authorized Officer:	Scott Mair
Title or position of Authorized Officer:	SVP Technology Planning & Engineering
Telephone number of Authorized Officer:	2147571510 ext.
Study Area Code of Reporting Carrier:	539010 <span style="float: right;">Filing Due Date for this form: 07/03/2017</span>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572041 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

## Attachments

**REDACTED – FOR PUBLIC DISCLOSURE**

**(200) Service Outage Voice Reporting Data Collection Form**

**REDACTED**

**FOR PUBLIC DISCLOSURE**

# Exhibit 539010OR310

## AT&T MOBILITY’S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2016 CALENDAR YEAR

Number of Unfulfilled Requests for Service	Description of How Service Was Attempted
1	<p>Section 54.313(a)(3) of the Commission’s rules requires an ETC to report the number of requests for service from potential customers within the ETC’s designated service area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. In response to a request for service, AT&amp;T Mobility takes the following steps:</p> <ol style="list-style-type: none"> <li>1) AT&amp;T Mobility will provide service on a timely basis to requesting customers within AT&amp;T Mobility’s service area where AT&amp;T Mobility’s network already passes the potential customer’s premises;</li> <li>2) If a customer cannot be served by AT&amp;T Mobility’s existing facilities, AT&amp;T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by:               <ol style="list-style-type: none"> <li>a) Modifying or replacing the requesting customer’s equipment;</li> <li>b) Deploying a roof-mounted antenna or other equipment;</li> <li>c) Adjusting the nearest cell tower;</li> <li>d) Adjusting network or customer facilities</li> <li>e) Reselling services from another carrier’s facilities to provide service; or</li> <li>f) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.</li> </ol> </li> </ol> <p>If, after these steps, the customer cannot be served, AT&amp;T Mobility will notify the customer and provide the Commission with an annual report of how many requests for service could not be filled.</p>



# Exhibit 539010OR510 - CTIA Seal



Meredith Attwell Baker

August 8, 2016

Mr. Glenn Lurie  
President & Chief Executive Officer  
AT&T Mobility  
1025 Lenox Park Boulevard  
Suite B667  
Atlanta, GA 30319

Dear Glenn:

Congratulations! This letter is to notify you that AT&T Mobility ("AT&T") has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2016 – December 31, 2016, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, AT&T is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of AT&T review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, we will provide two specimens (color and black/white) of the Seal for AT&T's use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Kathryn Dall'Asta, CTIA's Associate Counsel, at (202) 736-3677 or [kdallasta@ctia.org](mailto:kdallasta@ctia.org).

CTIA commends AT&T for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with AT&T on this important industry initiative.

Sincerely,

A handwritten signature in blue ink that reads "Meredith".

Meredith Attwell Baker

cc: Timothy G. Johnson, General Attorney

Attachment

# Exhibit 539010OR510 - CTIA Seal



## **SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION**

### **LICENSE AGREEMENT**

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

# Exhibit 539010OR610 - Emergency Preparedness

## **Functionality in Emergency Situations Certification**

Section 54.313(a)(6) requires an ETC to certify it is able to function in emergency situations as set forth in C.F.R. Section 54.202(a)(2). The standards set forth in Section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities, and a capability to manage traffic spikes resulting from emergency situations. AT&T Mobility LLC, dba AT&T Mobility, has in place emergency operation procedures so that it can function in an emergency. Backup power is provided at switch locations through a combination of batteries and portable and/or permanent generators. Similarly, backup power is generally provided at cell sites through a combination of batteries and portable and/or permanent generators. AT&T Mobility LLC, dba AT&T Mobility, also has portable COWs (Cells on Wheels) and COLTs (Cells on Light Trucks) that it can deploy in the event of an emergency.

Based on the foregoing, AT&T Mobility LLC, dba AT&T Mobility, certifies it is able to function in emergency situations as forth in C.F.R. Section 54.202(a)(2).

# Exhibit 539010OR610 - Emergency Preparedness



Meredith Attwell Baker

August 11, 2016

Mr. Glenn Lurie  
President and Chief Executive Officer  
AT&T Mobility  
1025 Lenox Park Boulevard, Suite C667  
Atlanta, GA 30319

Dear Glenn 

Congratulations! This letter is to notify you that AT&T Mobility has completed the recertification process for the CTIA Business Continuity/Disaster Recovery Program ("Program") for the period July 1, 2016– June 30, 2017. CTIA deems AT&T Mobility is compliant with the principles and objectives of the Program and confirms AT&T Mobility has recertified that it has implemented and maintained the requirements set forth in the Program.

Please ensure that the relevant employees of AT&T Mobility are aware of your recertification status. If you should have any questions concerning the certification process, please contact Kathryn Dall'Asta, CTIA's Associate Counsel, at (202) 736-3677 or [kdallasta@ctia.org](mailto:kdallasta@ctia.org).

CTIA commends AT&T Mobility for its ongoing leadership and participation in the CTIA Business Continuity/Disaster Recovery Program, and we look forward to continuing to work with AT&T Mobility on this important industry initiative.

Sincerely,



Meredith Attwell Baker

cc: Bruce Lundeen, MBCP, MBCI  
BCP Standards & Practices  
Business Continuity Planning



**(800) Operating Companies****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	539010
<015>	Study Area Name	AT&T Mobility
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mary Henze (OR)
<035>	Contact Telephone Number - Number of person identified in data line <030>	2024572028 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mh3376@att.com
<810>	Reporting Carrier	AT&T Mobility, LLC
<811>	Holding Company	SBC Telecom Inc., SBC Long Distance LLC., BellSouth Mobile Data, Inc.
<812>	Operating Company	AT&T Mobility Corporation

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	AT&T CORP	549004	AT&T Corp.
	AT&T MOBILITY PUERTO RICO INC.	639005	AT&T Mobility
	AT&T MOBILITY LLC	259908	AT&T Mobility
	AT&T MOBILITY LLC	399015	AT&T Mobility
	AT&T MOBILITY LLC	529910	AT&T Mobility
	AT&T MOBILITY LLC	539010	AT&T Mobility
	BELLSOUTH TELECOMMUNICATIONS, LLC	215191	AT&T Florida
	BELLSOUTH TELECOMMUNICATIONS, LLC	225192	AT&T Georgia
	BELLSOUTH TELECOMMUNICATIONS, LLC	235193	AT&T North Carolina
	BELLSOUTH TELECOMMUNICATIONS, LLC	245194	AT&T South Carolina
	BELLSOUTH TELECOMMUNICATIONS, LLC	255181	AT&T Alabama
	BELLSOUTH TELECOMMUNICATIONS, LLC	265182	AT&T Kentucky
	BELLSOUTH TELECOMMUNICATIONS, LLC	275183	AT&T Louisiana
	BELLSOUTH TELECOMMUNICATIONS, LLC	285184	AT&T Mississippi
	BELLSOUTH TELECOMMUNICATIONS, LLC	295185	AT&T Tennessee
	ILLINOIS BELL TELEPHONE COMPANY	345070	AT&T Illinois
	INDIANA BELL TELEPHONE COMPANY, INC.	325080	AT&T Indiana
	MICHIGAN BELL TELEPHONE COMPANY	315090	AT&T Michigan
	NEVADA BELL TELEPHONE COMPANY	555173	AT&T Nevada
	NEW CINGULAR WIRELESS PCS, LLC	209012	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	269905	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	279010	AT&T Mobility
	NEW CINGULAR WIRELESS PCS, LLC	289912	AT&T Mobility





# Exhibit 539010OR920 - OR Tribal Contacts

AT&T Services, Inc.  
11425 West 146th Street  
Olathe, Kansas 66062

T: 913-685-7581  
F: 281-664-9722  
C: 913-481-4119  
wbrowne@att.com

April 14, 2017

Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians  
Alexis Barry (CEO)  
1245 Fulton Avenue  
Coos Bay, OR 97420

Dear CEO Barry:

AT&T Mobility LLC (“AT&T Mobility”) has been designated as an eligible telecommunications carrier (“ETC”) for the purpose of receiving federal high-cost universal service support (“USF”) in certain geographic locations in Oregon, including all or part of the lands in the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (“FCC”), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> This rule became effective August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2016 AT&T Mobility received federal high-cost support in Oregon. AT&T is available for discussions with you and your colleagues about AT&T’s service and the topics set forth in 47 C.F.R. § 54.313(a)(9), such as planning, sustainability, and land use issues.

I am available to talk with you at your earliest convenience about these and other issues.

Sincerely,

Wauneta Browne

Regional Vice President – External Affairs

---

<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”); 47 C.F.R. § 54.313(a)(9). See also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, Public Notice, DA 12-11665 (rel. July 19, 2012), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)

<sup>2</sup> See 78 Fed. Reg. 47211 (Aug. 5, 2013). This rule is the subject of numerous petitions for reconsideration, which, to date, the FCC has neglected to address. See *Petition for Reconsideration of USTelecom*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Rural Incumbent Local Exchange Carriers Serving Tribal Lands Petition for Reconsideration*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Petition for Reconsideration and Clarification of USTelecom*, WC Docket No. 10-90 et al., 4-16 (filed Aug. 20, 2012); *USTelecom’s Petition for Reconsideration and Clarification and Comments in Response to Paperwork Reduction Act*, WC Docket No. 10-90 et al. (filed April 4, 2013).





# Exhibit 539010OR920 - OR Tribal Contacts

AT&T Services, Inc.  
11425 West 146th Street  
Olathe, Kansas 66062

T: 913-685-7581  
F: 281-664-9722  
C: 913-481-4119  
wbrowne@att.com

April 14, 2017

Confederated Tribes of Siletz Indians  
Chairperson Delores Pigsley  
PO Box 549  
Siletz, OR 97380-0549

Dear Chairperson Pigsley:

AT&T Mobility LLC (“AT&T Mobility”) has been designated as an eligible telecommunications carrier (“ETC”) for the purpose of receiving federal high-cost universal service support (“USF”) in certain geographic locations in Oregon, including all or part of the lands in the Confederated Tribes of Siletz Indians. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (“FCC”), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> This rule became effective August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2016 AT&T Mobility received federal high-cost support in Oregon. AT&T is available for discussions with you and your colleagues about AT&T’s service and the topics set forth in 47 C.F.R. § 54.313(a)(9), such as planning, sustainability, and land use issues.

I am available to talk with you at your earliest convenience about these and other issues.

Sincerely,

Wauneta Browne

Regional Vice President – External Affairs

---

<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”); 47 C.F.R. § 54.313(a)(9). See also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, Public Notice, DA 12-11665 (rel. July 19, 2012), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)

<sup>2</sup> See 78 Fed. Reg. 47211 (Aug. 5, 2013). This rule is the subject of numerous petitions for reconsideration, which, to date, the FCC has neglected to address. See *Petition for Reconsideration of USTelecom*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Rural Incumbent Local Exchange Carriers Serving Tribal Lands Petition for Reconsideration*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Petition for Reconsideration and Clarification of USTelecom*, WC Docket No. 10-90 et al., 4-16 (filed Aug. 20, 2012); *USTelecom’s Petition for Reconsideration and Clarification and Comments in Response to Paperwork Reduction Act*, WC Docket No. 10-90 et al. (filed April 4, 2013).



# Exhibit 539010OR920 - OR Tribal Contacts

AT&T Services, Inc.  
11425 West 146th Street  
Olathe, Kansas 66062

T: 913-685-7581  
F: 281-664-9722  
C: 913-481-4119  
wbrowne@att.com

April 14, 2017

Confederated Tribes of Warm Springs  
Chairperson Austin Green Jr.  
PO Box 1299  
Warm Springs, OR 97761-1299

Dear Chairperson Green:

AT&T Mobility LLC (“AT&T Mobility”) has been designated as an eligible telecommunications carrier (“ETC”) for the purpose of receiving federal high-cost universal service support (“USF”) in certain geographic locations in Oregon, including all or part of the lands in the Confederated Tribes of Warm Springs. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (“FCC”), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> This rule became effective August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2016 AT&T Mobility received federal high-cost support in Oregon. AT&T is available for discussions with you and your colleagues about AT&T’s service and the topics set forth in 47 C.F.R. § 54.313(a)(9), such as planning, sustainability, and land use issues.

I am available to talk with you at your earliest convenience about these and other issues.

Sincerely,

Wauneta Browne

Regional Vice President – External Affairs

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<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”); 47 C.F.R. § 54.313(a)(9). See also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, Public Notice, DA 12-11665 (rel. July 19, 2012), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)

<sup>2</sup> See 78 Fed. Reg. 47211 (Aug. 5, 2013). This rule is the subject of numerous petitions for reconsideration, which, to date, the FCC has neglected to address. See *Petition for Reconsideration of USTelecom*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Rural Incumbent Local Exchange Carriers Serving Tribal Lands Petition for Reconsideration*, WC Docket No. 10-90 et al. (filed Dec. 29, 2011); *Petition for Reconsideration and Clarification of USTelecom*, WC Docket No. 10-90 et al., 4-16 (filed Aug. 20, 2012); *USTelecom’s Petition for Reconsideration and Clarification and Comments in Response to Paperwork Reduction Act*, WC Docket No. 10-90 et al. (filed April 4, 2013).



# Exhibit 539010OR920 - OR Tribal Contacts

AT&T Services, Inc.  
11425 West 146th Street  
Olathe, Kansas 66062

T: 913-685-7581  
F: 281-664-9722  
C: 913-481-4119  
wbrowne@att.com

April 14, 2017

Coquille Indian Tribe  
Chairperson Brenda Meade  
3050 Tremont St  
North Bend, OR 97459-3059

Dear Chairperson Meade:

AT&T Mobility LLC (“AT&T Mobility”) has been designated as an eligible telecommunications carrier (“ETC”) for the purpose of receiving federal high-cost universal service support (“USF”) in certain geographic locations in Oregon, including all or part of the lands in the Coquille Indian Tribe. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (“FCC”), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> This rule became effective August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2016 AT&T Mobility received federal high-cost support in Oregon. AT&T is available for discussions with you and your colleagues about AT&T’s service and the topics set forth in 47 C.F.R. § 54.313(a)(9), such as planning, sustainability, and land use issues.

I am available to talk with you at your earliest convenience about these and other issues.

Sincerely,

Wauneta Browne

Regional Vice President – External Affairs

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<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”); 47 C.F.R. § 54.313(a)(9). See also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, Public Notice, DA 12-11665 (rel. July 19, 2012), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)

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Olathe, Kansas 66062

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F: 281-664-9722  
C: 913-481-4119  
wbrowne@att.com

April 14, 2017

Cow Creek Band of Umpqua Tribe of Indians  
Chairperson Dan Courtney  
2371 NE Stephens St Ste 100  
Roseburg, OR 97470-1399

Dear Chairperson Courtney:

AT&T Mobility LLC (“AT&T Mobility”) has been designated as an eligible telecommunications carrier (“ETC”) for the purpose of receiving federal high-cost universal service support (“USF”) in certain geographic locations in Oregon, including all or part of the lands in the Cow Creek Band of Umpqua Tribe of Indians. As an ETC, AT&T Mobility is subject to the rules and requirements of the Federal Communications Commission (“FCC”), including 47 C.F.R. § 54.313(a)(9), which requires high-cost USF recipients that serve Tribal lands to have discussions with Tribal governments.<sup>1</sup> This rule became effective August 5, 2013.<sup>2</sup>

You are receiving this letter because in 2016 AT&T Mobility received federal high-cost support in Oregon. AT&T is available for discussions with you and your colleagues about AT&T’s service and the topics set forth in 47 C.F.R. § 54.313(a)(9), such as planning, sustainability, and land use issues.

I am available to talk with you at your earliest convenience about these and other issues.

Sincerely,

Wauneta Browne

Regional Vice President – External Affairs

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<sup>1</sup> See *Connect America Fund*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663 (2011) (“*USF/ICC Transformation Order*”); 47 C.F.R. § 54.313(a)(9). See also *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, Public Notice, DA 12-11665 (rel. July 19, 2012), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-12-1165A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DA-12-1165A1.pdf)

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**Confederated Tribes of Warm Springs**  
 Chairman Austin Greene, Jr.  
 PO Box 1299  
 Warm Springs, OR 97761-1299

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<input type="checkbox"/> Adult Signature Required	\$0.00
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**Cow Creek Band of Umpqua Tribe of Indians**  
 Chairman Dan Courtney  
 2371 NE Stephens St Ste 100  
 Roseburg, OR 97470-1399

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**Coquille Indian Tribe**  
 Chairwoman Brenda Meade  
 3050 Tremont St  
 North Bend, OR 97459-3059

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**Confederated Tribes of Siletz Indians**  
 Chairwoman Delores Pigsley  
 PO Box 549  
 Siletz, OR 97380-0549

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**COOS BAY, OR 97420**

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**Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians**  
 Alexis Barry (CEO)  
 1245 Fulton Avenue  
 Coos Bay, OR 97420

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