

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

In the Matter of)
)
T-MOBILE WEST CORPORATION,) Docket No. UM 1511
)
Application for Designation as an Eligible)
Telecommunications Carrier and Request)
for Supplemental Certification of Use of)
Funds.)

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

Dated: October 8, 2014

DAVIS WRIGHT TREMAINE LLP
Mark P. Trincherro
1300 S.W. Fifth Avenue, Suite 2400
Portland, Oregon 97201
Tel. (503) 778-5318
Email: marktrincherro@dwt.com

T-MOBILE USA, INC.
Teri Y. Ohta
Principal Corporate Counsel, State Regulatory
Affairs
12920 SE 38th Street
Bellevue, WA 98006
Tel. (425) 383-5532
Email: Teri.Ohta@t-mobile.com

Attorneys for T-MOBILE WEST LLC

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PURSUANT TO 47 U.S.C. §214(e)(4)**

Pursuant to 47 U.S. C. §214(e)(4) and 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") and its Eligible Telecommunications Provider ("ETP") designations in the State of Oregon, effective as of December 31, 2014. As explained herein, this relinquishment of T-Mobile's ETC and ETP designations 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:

Mark P. Trinchero
DAVIS WRIGHT TREMAINE LLP
1300 S.W. Fifth Avenue, Suite 2400
Portland, Oregon 97201
Tel. (503) 778-5318
Email: marktrinchero@dwt.com

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Bellevue, WA 98006
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Email: Teri.Ohta@t-mobile.com

II. BACKGROUND

On November 1, 2012, the Commission issued Order No. 12-422 in docket UM 1511, in which it designated T-Mobile as an ETC and an ETP to enable T-Mobile to receive federal universal service support and support from the Oregon residential Service Protection Fund (“RSPF”) for the provision of Lifeline services in the wire centers listed in Exhibit A (“the ETC Service Area”).

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

Upon reviewing its on-going business plans, T-Mobile has decided that it will not continue to operate as a Lifeline-only ETC in Oregon. T-Mobile, therefore, provides this Notice of its intent to relinquish its ETC designation in Oregon, effective December 31, 2014. While T-Mobile will no longer receive reimbursement for Lifeline discounts after the effective date of its relinquishment, it will continue to provide wireless service in Oregon 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.”¹ 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 carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible

¹ 47 U.S.C. § 214(e)(4).

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 Oregon complies with federal law³ 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

² 47 C.F.R. § 54.205(a).

³ There are no Commission rules regarding relinquishment of ETP status. However, to be an ETP in Oregon, a carrier must be designated an ETC under federal law. Thus, T-Mobile's relinquishment of its ETC designation under federal law effectively terminates its ETP status in Oregon as well.

relinquishment; (3) T-Mobile will continue providing service to its customers, and additionally, the remaining ETCs in the market are able to serve the Lifeline needs of consumers within their respective designated ETC 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 Each Wire Center in the ETC Service Area

T-Mobile's ETC Service Area is currently served by more than one ETC.⁴ 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 two and one-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).

⁴ 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 has approximately 380 Lifeline customers in Oregon. Following relinquishment of its ETC designation, effective December 31, 2014, T-Mobile will provide notice to the former 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 Oregon, 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 Oregon. Therefore, the Commission should accept T-Mobile's notice of relinquishment.

IV. CONCLUSION

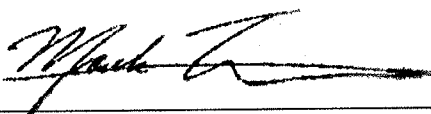
Consistent with all applicable requirements, T-Mobile respectfully requests the Commission expeditiously accept T-Mobile's notice of relinquishment of its ETC and ETP

designations in Oregon. T-Mobile has demonstrated that it meets the requirements for relinquishment of its ETC designation.

Dated this 8th day of October, 2014.

Respectfully submitted,

T-Mobile West LLC

By: 

Mark P. Trinchero, OSB #88322
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2400
Portland, Oregon 97201
Telephone: 503-778-5318
marktrinchero@dwt.com

T-MOBILE USA, INC.
Teri Y. Ohta
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12920 SE 38th Street
Bellevue, WA 98006
Tel. (425) 383-5532
Email: Teri.Ohta@t-mobile.com

ETC Service Area

Operating Carrier Name	Wire Center Code	Names
Beaver Creek Cooperative Telephone Co.	BVCKOR	Beaver Creek
Canby Telephone Association	CNBYOR	Canby
Canby Telephone Association	NEDYOR	Needy
Cascade Utilities Inc.	CRBTOR	Corbett
Cascade Utilities Inc.	EGCKOR	Eagle Creek
Cascade Utilities Inc.	ESCDOR	Estacada
Cascade Utilities Inc.	HANSOR	Haines
CenturyTel of Eastern Oregon, Inc.	BDMNOR	Boardman
CenturyTel of Eastern Oregon, Inc.	DRANOR	Drain
CenturyTel of Eastern Oregon, Inc.	DURKOR	Durkee
CenturyTel of Eastern Oregon, Inc.	ECHOR	Echo
CenturyTel of Eastern Oregon, Inc.	GVMOR	Government Camp
CenturyTel of Eastern Oregon, Inc.	HNTNOR	Huntington
CenturyTel of Eastern Oregon, Inc.	NPWROR	North Powder
CenturyTel of Eastern Oregon, Inc.	PLRKOR	Pilot Rock
CenturyTel of Eastern Oregon, Inc.	SHDDOR	Shedd
CenturyTel of Oregon, Inc.	AURROR	Aurora
CenturyTel of Oregon, Inc.	BWVLOR	Brownsville
CenturyTel of Oregon, Inc.	CHBUOR	Charbonneau
CenturyTel of Oregon, Inc.	CRWLOR	Creswell
CenturyTel of Oregon, Inc.	KNPPOR	Knappa
CenturyTel of Oregon, Inc.	LBNOR	Lebanon
CenturyTel of Oregon, Inc.	SCPPOR	Scappoose
CenturyTel of Oregon, Inc.	SWTHOR	Sweet Home
CenturyTel of Oregon, Inc.	YNCLOR	Yoncalla
Clear Creek Mutual Telephone Co.	RDLOR	Redland
Colton Telephone Co.	COTNOR	Colton
Frontier Communications Northwest, Inc. - OR	ALHOR	Aloha
Frontier Communications Northwest, Inc. - OR	AMTYOR	Amity
Frontier Communications Northwest, Inc. - OR	AMVLOR	Aumsville
Frontier Communications Northwest, Inc. - OR	BNKSOR	Banks
Frontier Communications Northwest, Inc. - OR	BVTNOR	Beaverton
Frontier Communications Northwest, Inc. - OR	CLTSOR	Clatskanie
Frontier Communications Northwest, Inc. - OR	DYTNOR	Dayton
Frontier Communications Northwest, Inc. - OR	FRGVOR	Forest Grove
Frontier Communications Northwest, Inc. - OR	GDISOR	Grand Island
Frontier Communications Northwest, Inc. - OR	GRHMOR	Gresham
Frontier Communications Northwest, Inc. - OR	GSTNOR	Gaston
Frontier Communications Northwest, Inc. - OR	HLDOR	Hoodland
Frontier Communications Northwest, Inc. - OR	HLBOOR	Hillsboro
Frontier Communications Northwest, Inc. - OR	MLCYOR	Mill City
Frontier Communications Northwest, Inc. - OR	MMVLOR	McMinnville
Frontier Communications Northwest, Inc. - OR	MRPHOR	Murphy
Frontier Communications Northwest, Inc. - OR	NWBROR	Newburg

Frontier Communications Northwest, Inc. - OR	ORNTOR	Orient
Frontier Communications Northwest, Inc. - OR	SCHLOR	Scholls
Frontier Communications Northwest, Inc. - OR	SHWDOR	Sherwood
Frontier Communications Northwest, Inc. - OR	SLTNOR	Silverton
Frontier Communications Northwest, Inc. - OR	SMRWOR	Somerset West
Frontier Communications Northwest, Inc. - OR	SNDYOR	Sandy
Frontier Communications Northwest, Inc. - OR	SNSDOR	Sunnyside
Frontier Communications Northwest, Inc. - OR	STFROR	Stafford
Frontier Communications Northwest, Inc. - OR	TGRDORXA	Tigard
Frontier Communications Northwest, Inc. - OR	TGRDORXC	Bull Mountain
Frontier Communications Northwest, Inc. - OR	TRNROR	Turner
Frontier Communications Northwest, Inc. - OR	TULTOR	Tualatin
Frontier Communications Northwest, Inc. - OR	VYVWOR	Valley View
Frontier Communications Northwest, Inc. - OR	WIVLOR	Wilsonville
Frontier Communications Northwest, Inc. - OR	YMHOR	Yamhill
Gervais Telephone Co.	GRVSOR	Gervais
Helix Telephone Co.	HELXOR	Helix
Helix Telephone Co.	MCHMOR	Meacham
Molalla Telephone Co.	MLLOR	Molalla
Monitor Cooperative Telephone Co.	MNTROR	Monitor
Monroe Telephone Co.	MONROR	Monroe
Mt. Angel Telephone Co.	MTANOR	Mt. Angel
Nehalem Telecomms Inc.	NHLMOR	Nehalem
Peoples Tel Co	LYNSOR	Lyons
Qwest Corporation	ADAROR	Adair
Qwest Corporation	ALBYOR	Albany
Qwest Corporation	ASLDOR	Ashland
Qwest Corporation	ASTROR	Astoria
Qwest Corporation	ATHNOR	Athena-Weston
Qwest Corporation	BAKROR	Baker City
Qwest Corporation	BENDOR	Bend
Qwest Corporation	BLBTOR	Black Butte
Qwest Corporation	BURLOR	Burlington
Qwest Corporation	CLVROR	Culver
Qwest Corporation	CNBHOR	Cannon Beach
Qwest Corporation	CNPOR	Central Point
Qwest Corporation	CRVSOR	Corvallis
Qwest Corporation	CTGVOR	Cottage Grove
Qwest Corporation	DLLSOR	Dallas
Qwest Corporation	EUGNOR28	River Road
Qwest Corporation	EUGNOR53	Eugene-10th Ave
Qwest Corporation	FLCYOR	Falls City
Qwest Corporation	FLRNOR	Florence
Qwest Corporation	GLHLOR	Gold Hill
Qwest Corporation	GRPSOR	Grants Pass
Qwest Corporation	HMTNOR	Hermiston
Qwest Corporation	INDPOR	Independence
Qwest Corporation	JCVLOR	Jacksonville
Qwest Corporation	JFSNOR	Jefferson

Qwest Corporation	JNCYOR	Junction City
Qwest Corporation	KLFLOR	Klamath Falls
Qwest Corporation	LAPIOR	La Pine
Qwest Corporation	LEBGOR	Leaburg
Qwest Corporation	LKOSOR	Lake Oswego
Qwest Corporation	LWLLOR	Lowell
Qwest Corporation	MDFDOR	Medford
Qwest Corporation	MDRSOR	Madras
Qwest Corporation	MLTNOR	Milton Freewater
Qwest Corporation	MLWKOR	Milwaukie
Qwest Corporation	MRCLOR	Marcola
Qwest Corporation	NPLNOR	North Plains
Qwest Corporation	NWPTOR	Newport
Qwest Corporation	NYSSOR	Nyssa
Qwest Corporation	ONTROR	Ontario
Qwest Corporation	ORCYOR	Oregon City
Qwest Corporation	ORSLOR	Oregon Slope
Qwest Corporation	PHNXOR	Phoenix
Qwest Corporation	PNTNOR	Pendleton
Qwest Corporation	PRVLOR	Prineville
Qwest Corporation	PTLDOR02	Cypress
Qwest Corporation	PTLDOR08	Harold
Qwest Corporation	PTLDOR11	Alpine
Qwest Corporation	PTLDOR12	Atlantic
Qwest Corporation	PTLDOR13	Belmont
Qwest Corporation	PTLDOR14	Butler
Qwest Corporation	PTLDOR17	Cherry
Qwest Corporation	PTLDOR18	Prospect
Qwest Corporation	PTLDOR69	Capitol
Qwest Corporation	RANROR	Rainier
Qwest Corporation	RDMDOR	Redmond
Qwest Corporation	RGRVOR	Rouge River
Qwest Corporation	RSBGOR	Roseburg
Qwest Corporation	SALMOR58	Salem
Qwest Corporation	SALMOR59	Keizer
Qwest Corporation	SESDOR	Seaside
Qwest Corporation	SPFDOR	Springfield
Qwest Corporation	SPRVOR	Spring River
Qwest Corporation	SSTROR	Sisters
Qwest Corporation	STFDOR	Stanfield
Qwest Corporation	STHNOR	St. Helens
Qwest Corporation	STHROR	Sutherlin
Qwest Corporation	UMTLOR	Umatilla
Qwest Corporation	VENTOR	Veneta
Qwest Corporation	WDBNOR	Woodburn
Qwest Corporation (OREGON PORTION ONLY)	WLWLWA	Walla Walla
Qwest Corporation	WNTNOR	Winston
Qwest Corporation	WRTNOR	Warrenton
Qwest Corporation	WSPTOR	Westport

Roome Telecommunications, Inc	HLSYOR	Halsey
Scio Mutual Telephone Association	SCIOOR	Scio
St Paul Cooperative Telephone Association	STPLOR	St. Paul
Stayton Cooperative Telephone Co.	STTNOR	Stayton
United Telephone of the Northwest	ARTNOR	Arlington
United Telephone of the Northwest	BYCYOR	Bay City
United Telephone of the Northwest	CODLOR	Cloverdale
United Telephone of the Northwest	CRTOOR	Carlton
United Telephone of the Northwest	CSLCOR	Cascade Locks
United Telephone of the Northwest	GRBLOR	Garibaldi
United Telephone of the Northwest	GRRNOR	Grand Rhonde
United Telephone of the Northwest	HDRVOR	Hood River
United Telephone of the Northwest	LNCYOR	Lincoln City
United Telephone of the Northwest	MOSROR	Mosier
United Telephone of the Northwest	ODLLOR	Odell
United Telephone of the Northwest	PCCYOR	Pacific City
United Telephone of the Northwest	PRDLOR	Parkdale
United Telephone of the Northwest	RKWYOR	Rockaway
United Telephone of the Northwest	RUFSOR	Rufus
United Telephone of the Northwest	SHCVOR	Shady Cove
United Telephone of the Northwest	SHRDOR	Sheridan
United Telephone of the Northwest	THDLOR	The Dalles
United Telephone of the Northwest	TLMKOR	Tillamook
United Telephone of the Northwest	WASCOR	Wasco
United Telephone of the Northwest	WHCYOR	White City
United Telephone of the Northwest	WLMNOR	Willamina

**CERTIFICATE OF SERVICE
UM 1511**

I certify that, on October 8, 2014, I served the foregoing **T-MOBILE WEST LLC'S NOTICE OF RELINQUISHMENT OF ITS ELIGIBLE TELECOMMUNICATIONS CARRIER AND ELIGIBLE TELECOMMUNICATIONS PROVIDER DESIGNATIONS PURSUANT TO 47 U.S.C. §214(e)(4)** on the following persons via electronic mail with the original and one copy sent to the PUC Filing Center via UPS Overnight delivery:

W	CITIZENS' UTILITY BOARD OF OREGON	
	OPUC DOCKETS	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
	GORDON FEIGHNER (C)	610 SW BROADWAY, STE 400 PORTLAND OR 97205 gordon@oregoncub.org
	G. CATRIONA MCCRACKEN (C)	610 SW BROADWAY, STE 400 PORTLAND OR 97205 catriona@oregoncub.org
W	LUKAS, NACE, GUTIERREZ & SACHS, LLP	
	BROOKS HARLOW (C)	8300 GREENSBORO DRIVE, STE 1200 MCLEAN VA 22102 bharlow@fcclaw.com
W	MCDOWELL RACKNER & GIBSON PC	
	LISA F RACKNER	419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 dockets@mcd-law.com
W	OCTA	
	MICHAEL DEWEY	1249 COMMERCIAL ST SE SALEM OR 97302 mdewey@oregoncable.com
W	PUBLIC UTILITY COMMISSION OF OREGON	
	JON CRAY (C)	PO BOX 1088 SALEM OR 97308-1088 jon.cray@state.or.us
	CELESTE HARI (C)	PO BOX 1088 SALEM OR 97308-1088 <u>celeste.hari@state.or.us</u>

W

**PUC STAFF - DEPARTMENT OF
JUSTICE**

JOHANNA
RIEMENSCHNEIDER (C)

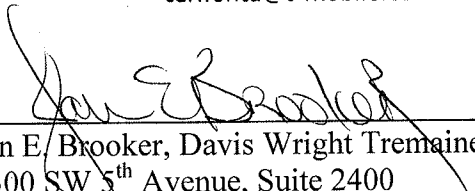
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4796
johanna.riemenschneider@doj.state.or.us

W

T-MOBILE USA INC

TERI OHTA

12920 SE 38TH ST
BELLEVUE WA 98006
teri.ohta@t-mobile.com



Jan E. Brooker, Davis Wright Tremaine LLP
1300 SW 5th Avenue, Suite 2400
Portland, OR 97201
503-778-5263