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April 20, 2012

## VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket No. UM 1511 – T-Mobile West Corporation's Amended Application for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Lifeline-Only Support**

Ladies and Gentlemen:

Enclosed for filing in the above-identified docket are an original and five copies of T-Mobile's Amended Application. Exhibits B, G and I (page 1 only) are confidential and will be sent separately in a sealed envelope in accordance with Protective Order No. 10-477.

A copy of this filing has been served on all parties to this proceeding both electronically and by mailing the confidential Exhibits B and G separately in a sealed envelope in accordance with Protective Order No. 10-477.

Please contact this office with any questions.

Very truly yours,

Candace Duncan  
Legal Assistant

cc: Service List

Enclosures

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1511**

4 In the Matter of T-Mobile West Corporation's | Amended Application for Designation as an  
5 Petition for Designation as an Eligible | Eligible Telecommunications Carrier for the  
6 Telecommunications Carrier | Limited Purpose of Lifeline-Only Support

7  
8 **I. INTRODUCTION**

9 T-Mobile West Corporation ("T-Mobile" or "Company") hereby files an Amended  
10 Application for Designation as an Eligible Telecommunications Carrier ("ETC") for the  
11 Limited Purpose of Lifeline-Only Support, pursuant to 47 U.S.C. § 214(e), Sections 54.201  
12 and 54.202 of the Federal Communications Commission ("FCC") rules, and the Public Utility  
13 Commission of Oregon's ("Commission") application requirements set forth in Order No. 06-  
14 292<sup>1</sup> ("Amended Application"). T-Mobile also seeks designation as an Eligible  
15 Telecommunications Provider ("ETP") for the purpose of participating in the Oregon  
16 Telephone Assistance Program ("OTAP"), which is the state's corollary of the federal Lifeline  
17 program.

18 T-Mobile hereby submits this Amended Application for designation as an ETC for the  
19 limited purpose of Lifeline-only support in the non-rural telephone company wire centers and  
20 rural telephone company study areas as set forth in Exhibit A ("ETC Service Area"). As  
21 explained herein, the public interest would be served by granting this Amended Application,  
22 because it would enable T-Mobile to advance universal service by serving the basic and  
23 advanced Lifeline communications needs of low-income consumers.

24 <sup>1</sup> *Re Staff Investigation to Establish Requirements for Initial Designation and Recertification of*  
25 *Telecommunications Carriers Eligible to Receive Federal Universal Service Support, Docket UM*  
26 *1217, Order No. 06-292 (June 13, 2006) [hereinafter "Order No. 06-292"]. The ETC requirements set*  
*forth in Order No. 06-292 are found in Appendix A to the order. The requirements are noted in this*  
*brief as "Requirement X."*

1 T-Mobile is a national facilities-based provider of wireless voice, messaging, and  
2 data services capable of reaching over 293 million Americans. T-Mobile has deployed an  
3 advanced telecommunications network capable of serving consumers' basic and advanced  
4 communications needs and continues to invest in its network to bring advanced  
5 communications services to consumers. T-Mobile currently employs approximately 42,000  
6 people nationwide, and more than 1,100 people within the state of Oregon. At the end of  
7 the fourth quarter of 2011, T-Mobile was serving approximately 33.2 million mobile  
8 customers nationwide.

9 In Oregon, T-Mobile has deployed hundreds of cell sites. T-Mobile has also pursued  
10 and obtained interconnection agreements with 25 incumbent local exchange carriers  
11 throughout Oregon. The Company holds radio licenses issued by the FCC to provide  
12 Commercial Mobile Radio Service ("CMRS") throughout the state of Oregon and specifically  
13 in its requested ETC Service Area. Upon designation as an ETC and ETP, T-Mobile will  
14 provide Lifeline services throughout its ETC Service Area to qualified low-income  
15 consumers, thereby advancing universal service in Oregon.

16 T-Mobile's corporate affiliates have been designated as ETCs in ten jurisdictions—  
17 nine states and Puerto Rico.<sup>2</sup> The nine states in which T-Mobile has been designated  
18 \_\_\_\_\_

19 <sup>2</sup>*Order Granting Eligible Telecommunications Carrier Designation, In Re: Petition for designation as*  
20 *eligible telecommunications carrier by T-Mobile South LLC*, Docket No. 090507-TP, Order No. PSC-  
21 *IO-0475-PAA-TP* (Florida Public Service Commission, July 28, 2010) (*Florida ETC Order*);  
22 *Application of T-Mobile South LLC for Designation as an Eligible Telecommunications Carrier*  
23 *pursuant to Section 214(e)(2) of the Communications Act of 1934*, Docket No. 32967 (Ga. Pub. Serv.  
24 *Comm'n*, decided Feb. 10, 2012, adopted Nov. 17, 2011); *Decision and Order, In Re the Application*  
25 *of T-Mobile West Corporation For Designation as an Eligible Telecommunications Carrier in the State*  
26 *of Hawaii*, Docket No. 2010-0119 (Hawaii Public Utilities Commission, March 14, 2011); *Order, In Re*  
*the Application of T-Mobile West Corp. For Designation as an Eligible Telecommunications Carrier*,  
Case No. TMW-T-10-01, Order No. 32319 (Idaho Public Utilities Commission, August 9, 2011) (*Idaho*  
*ETC Order*); *Order, In Re Petition of T-Mobile Central LLC and Powertel/Memphis, Inc. for*  
*Designation as Eligible Telecommunications Carriers Pursuant to Section 214(E)(2) of the*  
*Communications Act of 1934* (Kentucky Public Service Commission, July 14, 2010); *Public Decision,*  
*T-Mobile Central, LLC, ex parte. In Re Application for Designation as an Eligible Telecommunications*  
*Carrier (ETC) for the purposes of receiving Universal Service Support for low income and rural*  
*service*, S-31865 (Louisiana Public Service Commission, Minutes from Open Session, October 12,

1 include Florida, Georgia, Hawaii, Idaho, Kentucky, Louisiana, Minnesota, North Carolina,  
2 and Washington. T-Mobile also has nineteen pending requests for ETC designation in  
3 Alabama, Arizona, Connecticut, Delaware, District of Columbia, Indiana, Maryland,  
4 Massachusetts, Michigan, Mississippi, Missouri, New Hampshire, New Jersey, New York,  
5 Ohio, Oregon, Pennsylvania, Tennessee, and Virginia.

6 In designating T-Mobile as an ETC, the Florida Public Service Commission  
7 acknowledged the benefits of T-Mobile's entry into the universal service market to serve the  
8 Lifeline communications needs of low-income customers:

9 T-Mobile will promote the availability of universal service to the underserved,  
10 economically disadvantaged telephone customers in Florida. Based on our  
11 review, along with T-Mobile's commitment to abide by both state and federal  
12 rules and procedures, we find that T-Mobile's petition to be designated as an  
13 ETC is in the public interest and shall be approved.<sup>3</sup>

14 The Idaho Public Utilities Commission reached the same conclusion with regard to  
15 the public interest and the benefits to consumers:

16 We find that designating T-Mobile as an ETC in its requested rural and non-  
17 rural service areas is in the public interest. Granting ETC status will benefit  
18 consumers by offering new services and increased competition. In addition,  
19 we find granting T-Mobile ETC status will provide rural customers with greater  
20 access to wireless services and may be beneficial to eligible recipients for  
21 ITSAP and Lifeline services.<sup>4</sup>

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22 2011 (corrected), Ex. 31, p. 7); *Order Granting Petition for ETC Designation, Setting Conditions, and*  
23 *Requiring Compliance Filings, In Re T-Mobile Central LLC's Petition for Designation as an Eligible*  
24 *Telecommunications Carrier (ETC) in Minnesota*, Docket No. P-6856/M-11-123 (Minnesota Public  
25 Utilities Commission, September 27, 2011); *Order, High -Cost Universal Service Support; Federal-*  
26 *State Joint Commission on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Order,  
27 23 FCC Rcd 8834, 8837-50, ¶ 42 (2008) (*Interim Cap Order*); *Order Granting Designation as an*  
28 *Eligible Telecommunications Carrier, In Re the Petition of T-Mobile West Corporation for Designation*  
29 *as an Eligible Telecommunications Carrier*, Docket No. UT-101060 (Washington Utilities and  
30 Transportation Commission, October 14, 2010); *Resolution and Order, Telecorp Communications,*  
31 *Inc., d/b/a AT&T Wireless*, Case No. JRT-2003-SU-0003 (Puerto Rico Telecommunications  
32 Regulatory Commission, September 10, 2003).

33 <sup>3</sup>*Florida ETC Order*, at p. 8 (It should be noted that, as of this writing, T-Mobile is the only wireless  
34 facilities-based carrier designated as a CETC in Florida by the Florida Public Service Commission).

35 <sup>4</sup>*Idaho ETC Order*, at p. 13.

1 T-Mobile's principal place of business is 12920 SE 38<sup>th</sup> St., Bellevue, Washington,  
2 98006. Communications regarding this application should be addressed to:

3 Teri Y. Ohta  
4 Principal Corporate Counsel,  
5 State Regulatory Affairs  
6 T-Mobile USA, Inc.  
7 12920 SE 38th Street  
8 Bellevue, WA 98006

Lisa F. Rackner  
McDowell Rackner & Gibson PC  
419 SW 11<sup>th</sup> Ave.  
Suite 400  
Portland, OR 97205

## 7 II. REQUIREMENTS FOR DESIGNATION AS AN ETC

8 T-Mobile meets the requirements for designation as an ETC as established under  
9 federal law<sup>5</sup> and FCC rules,<sup>6</sup> and Order No. 06-292. 47 U.S.C. § 214(e)(2) provides that  
10 state commissions have the primary responsibility for designating ETCs.<sup>7</sup> The requirements  
11 for designation as an ETC in Oregon are as follows:<sup>8</sup>

- 12 1. Possess common carrier status;<sup>9</sup>  
13 2. Offer the services supported by federal universal service support  
14 mechanisms;<sup>10</sup>

15 \_\_\_\_\_  
16 <sup>5</sup> 47 U.S.C. § 214(e)(1).

17 <sup>6</sup> 47 C.F.R. § 54.201(d). In its *USF/ICC Transformation Order*, the FCC modified the required  
18 supported services in 47 C.F.R. § 54.101 and the additional requirements for designation as an ETC  
19 in 47 C.F.R. § 54.202. *In the Matter of Connect America Fund, Report and Order and Further Notice  
of Proposed Rulemaking*, FCC 11-161, released November 18, 2011 ("*USF/ICC Transformation  
Order*").

20 <sup>7</sup> Order No. 06-292 at 2 (citing 47 U.S.C. § 214(e)(1)).

21 <sup>8</sup> Requirement 5, a commitment to use support funds only for the intended purposes, is not relevant to  
22 this Amended Application because it seeks only Lifeline, not high cost, support. In addition, revisions  
23 to the Universal Service Fund rules require carriers seeking ETC designation before the FCC to  
24 "[c]ertify that it will comply with the service requirements applicable to the support that it receives,"  
25 this requirement has not been adopted by this Commission. See 47 C.F.R. § 54.202(a)(1)(i). This  
26 requirement eliminates the six-step service provisioning process previously included in the FCC rules.  
If the Commission determines that this requirement applies to ETCs in Oregon, T-Mobile certifies that  
it will comply with the service requirements applicable to Lifeline support.

25 <sup>9</sup> 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d); Requirement 1.

26 <sup>10</sup> 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. §§ 54.201(d)(1) and 54.405; Requirement 2.

- 1           3.       Use own facilities (or a combination of own facilities and resale) to provide  
            the supported services;<sup>11</sup>
- 2           4.       Provide the supported services throughout the designated service area;<sup>12</sup>
- 3           5.       Advertise the availability of universal service offerings and charges for such  
            offerings using media of general distribution;<sup>13</sup>
- 4           6.       Make available Lifeline service to qualified low-income consumers;<sup>14</sup>
- 5           7.       Maintain ability to remain functional in emergency situations;<sup>15</sup>
- 6           8.       Satisfy consumer protection and service quality standards;<sup>16</sup> and
- 7           9.       Show that ETC designation is in the public interest.<sup>17</sup>
- 8

9 T-Mobile's compliance with each of these requirements is discussed below.

10 **1.       T-Mobile is a Common Carrier.**

11           T-Mobile is licensed by the FCC to provide CMRS throughout the state of Oregon,  
12 including the ETC Service Area.<sup>18</sup> As a CMRS provider, T-Mobile is regulated as a common  
13 carrier under 47 U.S.C. §§ 214(e)(1), subject to all applicable regulations and therefore  
14 meets the ETC requirement of being a common carrier.<sup>19</sup>

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18 <sup>11</sup> 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1); Requirement 4.

19 <sup>12</sup> 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d); Requirement 3.

20 <sup>13</sup> 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2); Requirement 6.

21 <sup>14</sup> 47 C.F.R. § 54.405, Requirement 7.

22 <sup>15</sup> 47 C.F.R. § 54.202(a)(2); Requirement 8.

23 <sup>16</sup> 47 C.F.R. § 54.202(a)(3); Requirement 9.

24 <sup>17</sup> 47 U.S.C. § 214(e)(2); Requirement 10.

25 <sup>18</sup> Requirement 1.2. As discussed in this Application, T-Mobile will provide CMRS throughout its  
requested designated service area once it receives its ETC designation.

26 <sup>19</sup> Requirement 1.1.

1 **2. T-Mobile Offers the Services Supported by Universal Service Support**  
2 **Mechanisms.**

3 T-Mobile provides each of the eight services supported and will provide a toll-  
4 limitation service for qualifying low-income consumers upon designation as an ETC, as  
5 required by Order No. 06-292. T-Mobile commits to offer the required supported services  
6 set forth below throughout its ETC Service Area.<sup>20</sup>

7 1. Voice Grade Access to the Public Switched Telephone Network – the ability to  
8 transmit and receive voice communications with a minimum bandwidth of 300 to  
9 3,500 Hertz.<sup>21</sup> T-Mobile meets this requirement through its provision of mobile  
10 voice communications service and interconnection to the public switched  
11 telephone network.

12 2. Local Usage – make available an amount of local usage in universal service  
13 offerings.<sup>22</sup>

14 The Commission requires that an applicant demonstrate that it offers a local  
15 usage plan that is comparable to the basic local service offerings of the ILEC in  
16 the proposed designated service area.<sup>23</sup> T-Mobile provides its customers with  
17 calling plans that are comparable in value to those offered by the ILEC. T-  
18 Mobile's calling plans offer a number of benefits to customers, including the  
19 mobile nature of wireless service. In addition, T-Mobile's "local" calling area is  
20 broader than the ILEC. This is because customers that choose certain calling  
21 plans do not pay additional roaming or long distance charges for calls placed in  
22 the United States—effectively making these customers' calls to anywhere else in  
23 the United States "local" calls. T-Mobile's calling plans also include a number of  
24 features for no additional charge, such as voicemail, caller ID, call waiting, and  
25 conference calling. In addition, many of T-Mobile's calling plans include  
26 unlimited or nights and weekend minutes, and unlimited mobile-to-mobile calling  
on the T-Mobile network. T-Mobile's calling plans are therefore comparable to  
the basic local service offerings of the ILEC in the Requested Service Area.

3 3. Dual Tone Multi-Frequency ("DTMF") Signaling or Its Functional Equivalent – a  
4 method of signaling that facilitates the transportation of call set-up and call detail

21 <sup>20</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1. T-Mobile offers all required supported  
22 services, so Requirement 2.2 is not applicable. In the *USF/ICC Transformation Order*, the FCC  
23 revised the supported services to eliminate the requirement to offer dual tone multi-frequency  
24 signaling, single party service, access to operator service, access to interexchange service, and  
25 directory assistance. Nonetheless, T-Mobile continues to provide these services and functionalities as  
26 part of its universal service offerings, including Lifeline service.

24 <sup>21</sup> 47 C.F.R. § 54.101(a); Order No. 06-292, Appendix A at 1, Requirement 2.1.

25 <sup>22</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

26 <sup>23</sup> 47 C.F.R. § 54.202(4); Requirement 2.4.

1 information.<sup>24</sup> T-Mobile meets this requirement by providing out-of-band digital  
2 signaling and in-band multi-frequency signaling for call set-up and termination.

3 4. Single Party Service or Its Functional Equivalent – a dedicated message path for  
4 the length of a user’s particular transmission.<sup>25</sup> T-Mobile meets this requirement  
5 by providing a dedicated, non-shared, frequency path for each voice call.

6 5. Access to Emergency Services – access to emergency services includes both  
7 access to 911 and E911 services to the extent the local government has  
8 implemented such services.<sup>26</sup> T-Mobile meets this requirement by providing 911  
9 service and meeting all requests for E911 service from local public service  
10 answering points (“PSAPs”).

11 6. Access to Operator Services – access to any automatic or live assistance to a  
12 consumer to arrange for billing or completion, or both, of a telephone call.<sup>27</sup> T-  
13 Mobile meets this requirement by providing operator services to its customers  
14 directly or through third party arrangements.

15 7. Access to Interexchange Service – ability to make and receive calls using an  
16 interexchange carrier’s network.<sup>28</sup> T-Mobile meets this requirement by providing  
17 its customers with the ability to make and receive calls over interexchange  
18 network facilities.

19 8. Access to Directory Assistance – making available to customers, among other  
20 services, information contained in directory listings.<sup>29</sup> T-Mobile meets this  
21 requirement by providing all of its customers with access to directory listings by  
22 dialing “411” or “555-1212.”

23 9. Toll Limitation for Qualifying Low-Income Consumers – toll limitation means both  
24 toll blocking and toll control, or, if a carrier is not capable of providing both toll  
25 blocking and toll control, then toll limitation is defined as either toll blocking or toll  
26 control.<sup>30</sup> Upon implementing its Lifeline service offering, T-Mobile will offer toll  
27 limitation to qualifying low-income consumers at no additional charge. Upon  
28 implementing any Lifeline service offering that distinguishes between toll and  
29 non-toll calls, T-Mobile will offer toll limitation to qualifying low-income consumers  
30 at no additional charge. However, T-Mobile’s typical service offerings do not

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32 <sup>24</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

33 <sup>25</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

34 <sup>26</sup> 47 C.F.R. § 54.101(a); Order No. 06-292, Appendix A at 1, Requirement 2.1.

35 <sup>27</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

36 <sup>28</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

37 <sup>29</sup> Order No. 06-292, Appendix A at 1, Requirement 2.1.

38 <sup>30</sup> 47 C.F.R. § 54.101(a); 47 C.F.R. § 54.400(d); Order No. 06-292, Appendix A at 1, Requirement  
39 2.1.



1 distinguish between toll and non-toll calls and therefore toll limitation service is  
not applicable.<sup>31</sup>

2 T-Mobile also acknowledges that it may be required to provide equal access if it is  
3 the only remaining ETC in an area.<sup>32</sup>

4 **3. T-Mobile Will Use its Own Facilities to Offer Supported Services.**

5 T-Mobile is a facilities-based wireless telecommunications carrier with its own  
6 switching, transport, cell sites, and associated telecommunications facilities in its ETC  
7 Service Area.<sup>33</sup> While an ETC can meet its universal service obligations by combining its  
8 own facilities with the resale of another carrier's services, T-Mobile intends to use its own  
9 facilities to meet its universal service obligations. Confidential Exhibit B contains a map  
10 showing the extent of T-Mobile's current network coverage in Oregon and signal strengths.<sup>34</sup>  
11 T-Mobile is a party to numerous interconnection agreements that are listed in Exhibit C.<sup>35</sup>

12 **4. T-Mobile Has the Ability to and Commits to Provide Supported Services  
Throughout the ETC Service Area.**

13 T-Mobile's ETC Service Area includes the entire wire centers of the non-rural  
14 telephone company areas and study areas of the rural telephone company areas identified  
15 in Exhibit A.<sup>36</sup> Attached as Exhibit D is a map reflecting T-Mobile's ETC Service Area along  
16

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17 <sup>31</sup> In its *Lifeline Reform Order, In the Matter of Lifeline and Link Up Reform and Modernization, Report  
18 and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released  
19 February 6, 2012 ("*Lifeline Reform Order*"), the FCC stated "[i]n this Order, we relieve ETCs of the  
20 obligation to offer TLS in the first instance if their Lifeline offering does not distinguish in the pricing of  
toll and non-toll calls, which may relieve many ETCs of the obligation to offer TLS." *Lifeline Reform  
Order* at para. 238. T-Mobile has not previously and has no plans in the future to seek  
reimbursement for any toll limitation services provided to Lifeline customers.

21 <sup>32</sup> Requirement 2.5.

22 <sup>33</sup> 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1); Requirement 4.1.

23 <sup>34</sup> Requirement 4.2.

24 <sup>35</sup> Requirement 4.3.

25 <sup>36</sup> Requirement 3.1.2 of Order No. 06-292 at Appendix A at 1. In areas served by a rural telephone  
26 company, the ETC's "service area" will be defined as the ILEC study area unless the state  
commission and the FCC redefine the study area. 47 C.F.R. § 54.207(b); 47 U.S.C. § 214(e)(5).

1 with its FCC licensed service area in Oregon.<sup>37</sup> T-Mobile commits to providing the  
2 supported services throughout its ETC Service Area, consistent with all applicable  
3 requirements.

4

5 **5. T-Mobile Will Advertise the Availability of its Universal Service Offerings and**  
6 **Charges for Such Offerings Using Media of General Distribution.**

7 T-Mobile commits to advertise the availability of, and charges for, the supported  
8 services using media of general distribution.<sup>38</sup> T-Mobile currently offers and advertises its  
9 wireless telecommunications services, including those offerings that include all of the  
10 supported services, using radio, television, billboards, print, internet, and targeted mailings.<sup>39</sup>  
11 In addition, T-Mobile maintains various retail stores and authorized dealer locations  
12 throughout its proposed ETC designated service area. T-Mobile will use one or more of  
13 these media outlets to advertise its universal service offerings in a manner consistent with  
14 applicable requirements. In its *Lifeline Reform Order*, the FCC also adopted specific  
15 requirements for Lifeline advertising, which T-Mobile will comply with.<sup>40</sup>

15

16 **6. T-Mobile Will Make Available Lifeline Service to Qualifying Low-Income**  
17 **Consumers.**

18 Consumers increasingly rely on their mobile phones for all of their communications  
19 needs and qualifying low-income consumers are no exception. Upon designation as an  
20 ETC, T-Mobile will offer a Lifeline discount on all generally available service offerings that  
21 include basic telephone service pursuant to Oregon Administrative Rules (“OAR”) 860-033-

21

22 \_\_\_\_\_

23 <sup>37</sup> Requirements 3.1.1 and 3.1.2 of Order No. 06-292 at Appendix A at 1.

24 <sup>38</sup> Requirement 6.1; *see also* 47 C.F.R. §§ 54.401-54.417; 54.405(b) and 54.411(d).

25 <sup>39</sup> Requirement 6.2.

26 <sup>40</sup> *See Lifeline Reform Order* at paras. 275-282.

1 0010 and 860-033-0035(1).<sup>41</sup> As implemented in other states where the Company has been  
2 designated as an ETC, T-Mobile will also make available the following post-paid Lifeline  
3 service offering,<sup>42</sup> which is subject to change:

- 4 • a low \$6.49 per month Lifeline rate,<sup>43</sup>
- 5 • 145 Whenever Minutes®,<sup>44</sup> 500 night minutes, 500 weekend minutes per  
6 month, and an average rate of \$.05 per minute; and
- 7 • an affordable handset.

8 In accordance with 47 C.F.R. § 54.403, T-Mobile will make Lifeline service available to  
9 qualified residents of federally recognized tribal lands that fall within T-Mobile's designated  
10 service area, including the Grand Ronde Community, the Umatilla Reservation, the Siletz  
11 Reservation, the Coos, Lower Umpqua and Siuslaw Reservation, the Klamath Reservation,  
12 and the Cow Creek Reservation.

13 T-Mobile will distribute literature describing its Lifeline services to locations where  
14 those likely to be eligible for the program(s) would encounter the brochures, such as  
15 hospitals, clinics, hospices, senior centers, welfare offices, and/or other locations.<sup>45</sup> All of T-  
16 Mobile's advertising campaigns, which will reflect Oregon-specific eligibility requirements,  
17 promote the availability of affordable wireless services to qualifying low-income customers.

18

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19 <sup>41</sup> Requirement 7.1. T-Mobile will also seek Oregon support for participating in the Oregon Telephone  
20 Assistance Program under OAR 860-033-0035(1)(c) and 860-033-0045.

21 <sup>42</sup> The customer will receive a bill.

22 <sup>43</sup> The \$6.49 per month discounted Lifeline rate is based upon a non-discounted rate of \$19.99 per  
23 month *minus* a \$10.00 federal Lifeline discount (\$19.99-\$10.00=\$9.99) minus a \$3.50 OTAP  
24 discount. In the *Lifeline Reform Order*, the FCC established a uniform federal Lifeline reimbursement  
of \$9.25 per month per eligible consumer. As such, the Company may revise the Lifeline discount  
available to eligible consumers to be consistent with the applicable reimbursement amount.

25 <sup>44</sup> Whenever minutes® are minutes that can be used at any time and anywhere on T-Mobile's  
nationwide network.

26 <sup>45</sup> Requirement 7.2, 7.3.

1 In addition, T-Mobile will submit all proposed Oregon-specific Lifeline marketing and  
2 advertising material, including, but not limited to, television and radio advertisements, for  
3 Staff review at least twenty-one (21) calendar days in advance of publishing or releasing the  
4 advertisement. T-Mobile will discuss any concerns Staff may have with respect to any such  
5 advertising materials and work in good faith to address such concerns. Exhibit E shows an  
6 example of T-Mobile's Lifeline advertisements used in Washington, where T-Mobile is  
7 designated as an ETC.

8 A description of T-Mobile's currently available rate plans are identified on its web  
9 page: www.t-mobile.com. T-Mobile periodically reevaluates its rate plans and, from time-to-  
10 time, makes available promotional plans. Promotional rate plans may be subject to  
11 additional terms and conditions, available for a limited time, and may or may not be  
12 advertised in advance. A sample of T-Mobile's currently available rate plans that include the  
13 supported services that will qualify for Lifeline universal service support are attached as  
14 Exhibit F.<sup>46</sup>

15 **7. T-Mobile Has the Ability to Remain Functional in Emergencies.**

16 In order to be designated as an ETC, the applicant must demonstrate a reasonable  
17 ability to remain functional in an emergency situation.<sup>47</sup> Requirements 8 and 47 C.F.R. §  
18 54.202(a)(2) set forth three areas of demonstration with respect to remaining functional in an  
19 emergency situation: back-up power to ensure a functioning network; network redundancy  
20 for re-routing; and how traffic spikes are addressed.

21 T-Mobile has fixed and portable back-up power generators located at various  
22 network locations that it can deploy in emergency situations. The majority of sites not  
23 equipped with fixed generators have battery back-up systems installed to maintain service in  
24 \_\_\_\_\_

25 <sup>46</sup> Requirement 2.3.

26 <sup>47</sup> Requirement 8.1; 47 C.F.R. § 54.202(a)(2).

1 the event of a widespread power outage. T-Mobile has the ability to re-route traffic around  
2 damaged out-of-service facilities through the deployment of cell-on-wheels (“COWS”),  
3 redundant facilities, and dynamic re-routing of traffic over alternate facilities. T-Mobile has a  
4 network control center that monitors network traffic and anticipates traffic spikes and can: (i)  
5 deploy network facilities to accommodate capacity needs; (ii) change call routing  
6 translations; and (iii) deploy COWS to temporarily meet traffic needs until more long-term  
7 solutions, such as additional capacity and antenna towers, can be deployed.

8 T-Mobile has achieved full deployment of E911 in its service area and is in full  
9 compliance with E911 requirements.<sup>48</sup>

10 In addition to the above emergency functionality measures, T-Mobile also maintains  
11 an extensive Business Continuity Program that consists of a number of professionals  
12 responsible for documenting and developing enterprise standards, processes, and policies  
13 for all business continuity planning and defines enterprise tools and methodologies. An  
14 overview of T-Mobile’s Business Continuity Program is provided as Confidential Exhibit G.

15 **8. T-Mobile Will Meet Service Quality and Consumer Protection Standards.**

16 Pursuant to FCC regulations and Order No. 06-292, T-Mobile agrees to comply with  
17 the CTIA-The Wireless Association’s® Consumer Code for Wireless Service (“CTIA  
18 Code”).<sup>49</sup> T-Mobile is a signatory to the CTIA Code, which is the applicable service quality  
19 and consumer protection standard for wireless carriers.<sup>50</sup> As a signatory to the CTIA Code,

20 \_\_\_\_\_

21 <sup>48</sup> Requirement 8.2.

22 <sup>49</sup> 47 C.F.R. § 54.202(a)(3) and Requirement 9.1.

23 <sup>50</sup> See CTIA Consumer Code for Wireless Service, *available at* [http://files.ctia.org/pdf/The\\_Code.pdf](http://files.ctia.org/pdf/The_Code.pdf).  
24 Signatories to the CTIA Code agree to: (1) disclose rates and terms of service to consumers; (2)  
25 make available maps showing where service is generally available; (3) provide contract terms to  
26 customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific  
disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7)  
provide customers the right to terminate service for changes to contract terms; (8) provide ready  
access to customer service; (9) promptly respond to consumer inquiries and complaints received from  
government agencies; and (10) abide by policies for protection of consumer privacy.

1 T-Mobile must demonstrate its compliance with CTIA on an annual basis in order to receive  
2 authorization to display the CTIA seal of Wireless Quality/Consumer Information. CTIA has  
3 consistently certified T-Mobile's compliance with the CTIA Code since 2003. Exhibit H is a  
4 copy of T-Mobile's annual certification granted in October 2011.

5 T-Mobile also provides its customers with other service quality and consumer  
6 protection benefits that have resulted in the Company being repeatedly recognized for  
7 excellence. On March 16, 2012, T-Mobile was recognized by the Ethisphere Institute as  
8 one of the 2012 World's Most Ethical Companies, which marked the fourth consecutive year  
9 that T-Mobile has been included on the list. T-Mobile secured this prestigious distinction by  
10 continuing to implement ethical business practices and initiatives that are instrumental to the  
11 Company's success, while benefitting the community and raising the standard for the  
12 industry. T-Mobile was the only U.S. wireless telecommunications service provider included  
13 on the 2012 list.

14 T-Mobile commits to use its best efforts to resolve complaints received by the  
15 Commission and designates the following person to work with the Commission's Consumer  
16 Services Division for complaint resolution: Teri Y. Ohta, T-Mobile USA, Inc. 12920 SE 38<sup>th</sup>  
17 Street Bellevue, WA 98006.<sup>51</sup>

18 **9. The Designation of T-Mobile as an ETC is in the Public Interest.**

19 T-Mobile currently serves the mobile communications needs of Oregon consumers,  
20 and, through its proposed Lifeline offering, T-Mobile will significantly expand its business in  
21 Oregon by making available to low-income consumers new service offerings that meet  
22 consumers basic and advanced communication needs. As a CMRS provider, T-Mobile is  
23 not subject to universal service obligations in Oregon today; however, as a Lifeline service  
24

25 \_\_\_\_\_

26 <sup>51</sup> Requirement 9.2.

1 provider, T-Mobile will be entering the universal service market and, by doing so, will be  
2 subject to the following universal service obligations:

- 3 1. Providing Lifeline service that includes all of the supported services;
- 4 2. Committing to meet and maintain compliance with certain requirements  
5 applicable to Lifeline ETCs, including:
  - 6 a. complying with service requirements applicable to Lifeline service  
7 providers;
  - 8 b. satisfying consumer protection standards; and
  - 9 c. maintaining the ability to remain functional in emergency situations;  
10 and
- 11 3. Increasing public awareness of the availability of Lifeline programs by:
  - 12 a. advertising the availability of its Lifeline offerings; and,
  - 13 b. undertaking outreach initiatives aimed at eligible low-income  
14 consumers.
- 15 4. Offering Lifeline service consistent with the requirements of the FCC's rules  
16 and Commission rules and orders.

17 **A. Designating T-Mobile as an ETC Will Increase Customer Choices.**

18 As an ETC, T-Mobile will expand customer choice throughout its designated service  
19 area by making its Lifeline service offerings available to all eligible low-income consumers.<sup>52</sup>

20 The benefits of competition are widely recognized and extend to all markets, including the  
21 universal service market, as recognized by the FCC.<sup>53</sup>

22 We note that an important goal of the Act is to open local  
23 telecommunications markets to competition. Designation of competitive  
24 ETCs promotes competition and benefits consumers in rural and high-  
25 cost areas by increasing customer choice, innovative services, and new  
26 technologies. We agree with Western Wireless that competition will result

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27 <sup>52</sup> Requirement 10.1.1.

28 <sup>53</sup> In the Matter of the Federal-State Joint Board on Universal Service, Western Wireless Corp.  
29 Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC  
30 Docket No. 96-45, *Memorandum Opinion and Order*, DA. 00-2896, ¶ 17 (released December 26,  
31 2000).

1 not only in the deployment of new facilities and technologies, but will also  
2 provide an incentive to the incumbent rural telephone companies to  
3 improve their existing network to remain competitive, resulting in  
4 improved service to Wyoming consumers [consumers in the proposed  
ETC service area]. In addition, we find that the provision of competitive  
service will facilitate universal service to the benefit of consumers in  
Wyoming by creating incentives to ensure that quality services are  
available at “just, reasonable, and affordable rates.”

5 Similarly, this Commission has previously recognized that consumers benefit from a  
6 competitive carrier being designated as an ETC.<sup>54</sup>

7 **B. Designating T-Mobile as an ETC Will Significantly Expand Lifeline  
8 Access in Oregon.**

9 Consumers rely on wireless services for their telecommunications needs. The  
10 designation of T-Mobile as an ETC will make wireless Lifeline service available to qualifying  
11 eligible customers in areas that currently may not have a wireless Lifeline service offering  
12 and will provide increased Lifeline choices in areas in which a wireless company has already  
13 been designated as an ETC. T-Mobile’s designation as an ETC will therefore provide a  
14 significant benefit to low-income Oregonians and will further the goals of universal service.

15 **C. T-Mobile’s Service Offerings Provide a Number of Advantages.**

16 T-Mobile’s service offerings provide consumers with a number of advantages.<sup>55</sup> T-  
17 Mobile offers competitively-priced rate plans and today’s most popular features, including  
18 talk, text, and web browsing features, in a variety of options to meet consumer needs. T-  
19 Mobile also offers features that allow consumers to control their monthly telecommunications  
20 costs. For example, T-Mobile offers unlimited T-Mobile-to-T-Mobile calling and unlimited  
21 nights and weekends on many of its standard rate plans. And because T-Mobile’s standard  
22 rate plans include nationwide calling at no additional charge, consumers do not need to be  
23 concerned about incurring long distance charges. Eligible low-income customers in Oregon

24 \_\_\_\_\_  
25 <sup>54</sup> See, e.g., *Re Cingular Wireless, LLC Application for Designation as an Eligible  
Telecommunications Carrier*, Docket UM 1253, Order No. 07-111 (Mar. 29, 2007).

26 <sup>55</sup> Requirement 10.1.2.



1 will be able to receive their Lifeline and OTAP discounts on their existing plans or choose a  
2 plan that best meets their individual needs. T-Mobile is committed to providing consumers  
3 solutions that make traditional post-paid wireless service more flexible. For example, T-  
4 Mobile offers consumers options of post-paid service with a no annual contract commitment  
5 at competitive rates. T-Mobile also offers equipment installment payment plans on certain  
6 rate plans that help qualifying consumers manage upfront costs.

7 **D. T-Mobile Collects and Remits the Oregon 911 Tax and the Residential**  
8 **Service Protection Fund Surcharge and Will Continue to Do So.**

9 T-Mobile currently and will continue to collect and remit, not only the Oregon 911 tax,  
10 but also the Residential Service Protection Fund (“RSPF”) surcharge, which sustains the  
11 support available from the OTAP pursuant to OAR 860-033-0036(1)(c) and 860-033-0045.

12 **E. A Cream-Skimming Analysis is Not Required.**

13 T-Mobile’s Amended Application does not include a cream-skimming analysis,  
14 because T-Mobile is seeking designation for entire wire centers in non-rural telephone  
15 company areas, entire study areas in rural telephone company areas and in entire wire  
16 centers in rural telephone company areas where the Commission and the FCC have already  
17 redefined the study area to the wire center level. The Commission does not require a  
18 cream-skimming analysis under such circumstances.<sup>56</sup>

19 **F. ETC Annual Reports**

20 T-Mobile agrees to file annual reports as required by the Commission and the FCC  
21 to ensure continuing ETC status.

22 **III. ISSUES ARISING OUT OF THE *LIFELINE REFORM ORDER***

23 **1. T-Mobile is Financially and Technically Capable of Providing Lifeline Service .**

24 In the *Lifeline Reform Order*, released on February 6, 2012, the FCC adopted rule 47  
25 C.F.R. Section 54.202(a)(4), which requires Lifeline-only ETC applicants to demonstrate

26 <sup>56</sup> Requirement 10.2.

1 financial and technical capability of providing Lifeline service in compliance with applicable  
2 requirements.<sup>57</sup> In explaining this new requirement, the FCC stated:

3       Among the relevant considerations for such a showing would be whether the  
4       applicant previously offered services to non-Lifeline consumers, how long it  
5       has been in business, whether the applicant intends to rely exclusively on  
6       USF disbursements to operate, whether the applicant receives or will receive  
7       revenue from other sources, and whether it has been subject to enforcement  
8       action or ETC revocation proceedings in any state.<sup>58</sup>

9       As demonstrated herein, T-Mobile is a well-established, facilities-based wireless  
10       telecommunications carrier with a long history of providing service in the state to non-Lifeline  
11       consumers and does not rely exclusively on USF disbursements. T-Mobile receives  
12       revenue from several non-USF sources, is currently a Lifeline service provider in numerous  
13       states, and has not been subject to ETC enforcement or revocation proceedings in any  
14       state. As such, T-Mobile clearly has the financial and technical capability of providing  
15       Lifeline service in compliance with all applicable requirements consistent with 47 C.F.R.  
16       Section 54.202(a)(4).

## 17       **2. Information on T-Mobile's Lifeline Service Offerings**

18       T-Mobile explains its Lifeline service offering, including “the terms and conditions of  
19       any voice telephony service plans offered to Lifeline subscribers, including details on the  
20       number of minutes provided as part of the plan, additional charges, if any, for toll calls, and  
21       rates for each such plan,” consistent with 47 C.F.R. § 54.202(a)(5).

## 22       **3. T-Mobile Has Taken Additional Steps to Prevent Waste, Fraud, and Abuse.**

23       In its *Lifeline Reform Order*, the FCC adopted comprehensive reforms to the low-  
24       income program to revise and modernize the Lifeline service requirements and implement  
25       measures to address fraud, waste, and abuse within the system. T-Mobile has thoroughly

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26       <sup>57</sup> See *Lifeline Reform Order*. The FCC adopted comprehensive reforms to the federal low-income  
27       program, including steps to limit fraud, waste and abuse within the program.

28       <sup>58</sup> *Lifeline Reform Order* at para. 388.

1 reviewed the *Lifeline Reform Order* and all newly-adopted requirements and will implement  
2 the internal controls and processes to ensure compliance with the FCC's final rules and any  
3 subsequent FCC orders.<sup>59</sup> T-Mobile is a well-established universal service provider  
4 operating in multiple states with a comprehensive compliance program in place to address  
5 all existing and future requirements.

6 **IV. DESIGNATION OF T-MOBILE AS AN ETP**

7 T-Mobile also seeks designation as an ETP, authorizing it to provide service through  
8 the OTAP to low income consumers in Oregon and for the purpose of receiving support from  
9 the RSPF for serving low income consumers in its ETC Service Area. Confidential  
10 Exhibit I<sup>60</sup> is a copy of T-Mobile's ETP application. T-Mobile will meet all RSPF and OTAP  
11 requirements in Commission rules (*i.e.* OAR 860-033-0001 through 860-033-0046); no  
12 waivers are needed nor requested.

13 T-Mobile understands and agrees that the Commission's RSPF Staff will  
14 perform the eligibility verification functions for Lifeline pursuant to Oregon Administrative  
15 Rule (OAR) 860-033-0030. The Commission has a dedicated team of staff who respond to  
16 public inquiries via inbound and outbound phone support in which the Commission staff  
17 explains Lifeline rules, eligibility criteria, the application and program processes, policies and  
18 procedures as well as available benefits. T-Mobile will support the Commission's  
19 administrative role in Lifeline and OTAP by making available at least two designated  
20 contacts, one of which will serve as a backup, for daily communications with Commission's  
21 RSPF Staff regarding customer or reporting questions and concerns. In addition, T-Mobile  
22 will make available at least one designated contact to the Commission's RSPF Program

23

24 \_\_\_\_\_

25 <sup>59</sup> T-Mobile notes that the *Lifeline Reform Order* may be subject to petitions for reconsideration.

26 <sup>60</sup> A redacted version is being filed electronically; a confidential version is being mailed.

1 Manager for resolution of issues above the level of the Commission's RSPF Staff and T-  
2 Mobile customer service representatives.

3 T-Mobile also recognizes that Commission Staff are initiating Lifeline legal, policy  
4 and operational changes to align with the adopted measures in the FCC's *Lifeline Reform*  
5 *Order*. Thus, T-Mobile agrees to abide by resulting FCC and state of Oregon requirements.

6 **V. CONCLUSION**

7 T-Mobile respectfully requests that the Commission: (1) grant T-Mobile designation  
8 as an ETC for the limited purpose of providing Lifeline service to eligible low-income  
9 consumers in the ILEC wire centers listed in Exhibit A; and (2) grant T-Mobile designation as  
10 an ETP for the purpose of participating in the OTAP in the same area.

11

12 DATED: April 20, 2012.

**MCDOWELL RACKNER & GIBSON PC**

13  
14 

15 Lisa F. Rackner  
16 Amie Jamieson

17 Attorneys for T-Mobile

**T-MOBILE**

18 Teri Y. Ohta  
19 Principal Corporate Counsel,  
20 State Regulatory  
21 12920 SE 38<sup>th</sup> Street  
22 Bellevue, WA 98006  
23  
24  
25  
26

## 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.	GVCNOR	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.	LBNNOR	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.	RDLTOR	Redland
Colton Telephone Co.	COTNOR	Colton
Frontier Communications Northwest, Inc. - OR	ALOHOR	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	HDLTOR	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	YMHLOR	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	CNPNOR	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

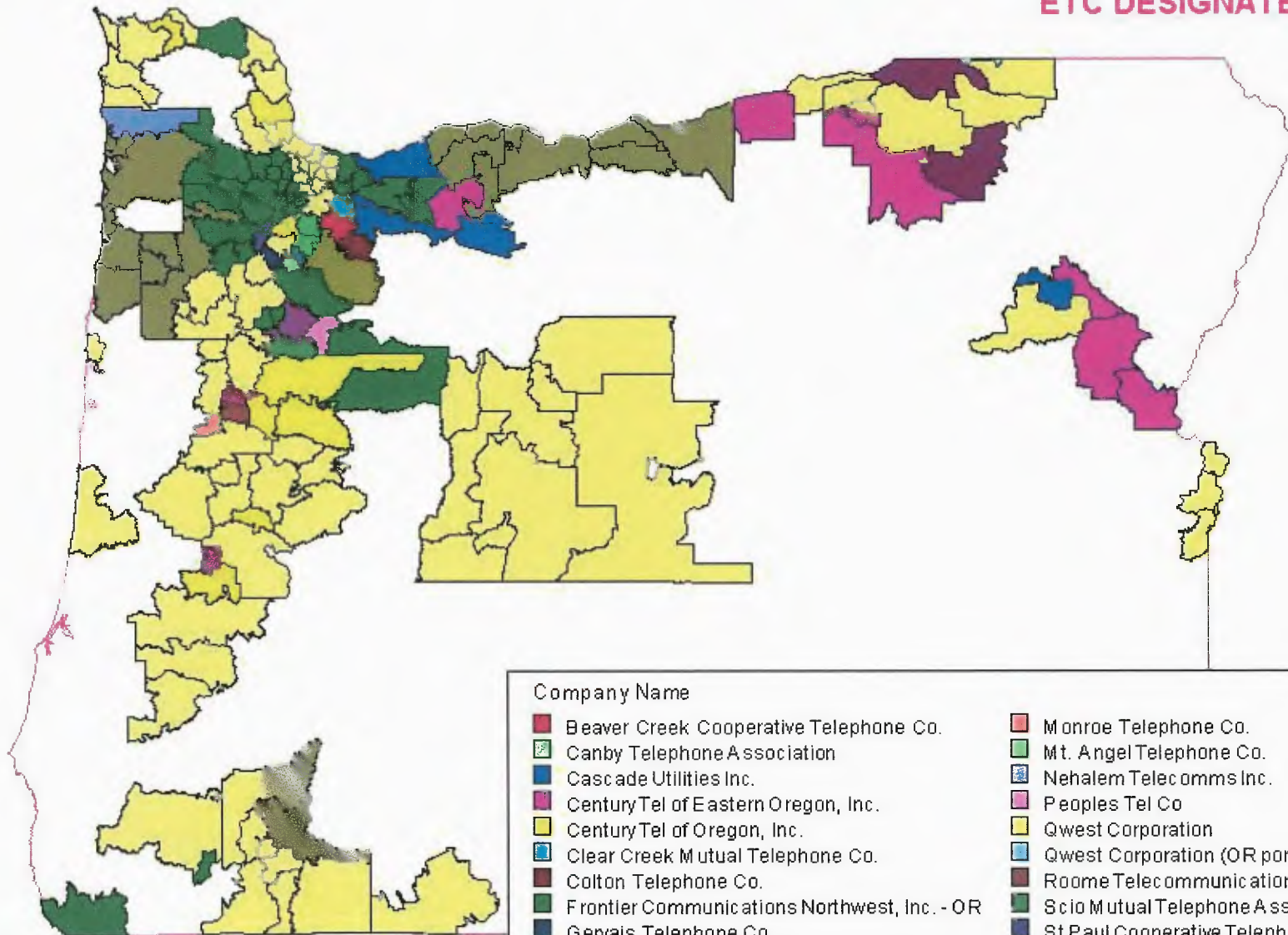
Roome Telecommunications, Inc	HLSYOR	Halsey
Scio Mutual Telephone Association	SCIOOR	Scio
St Paul Cooperative Telephone Association	STPLOR	St. Paul
Stayton Cooperative Telephone Co.	STTNOR	Stayton
United Telephone of the Northwest	ARTNOR	Arlington
United Telephone of the Northwest	BYCYOR	Bay City
United 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



**EXHIBIT B IS CONFIDENTIAL  
AND WILL BE SENT UNDER  
SEPARATE COVER**

OCN Name	Carrier Name	ST	LERG 1	OCN	DBA Name	AKA/FKA Name	Interconnection Agreement	Effective Date	Notes
Canby Telephone Association	Canby Telephone Association	OR	ILEC	2362	Canby Telephone Association		Canby Telephone Association & T-Mobile USA	01/01/04	
Cascade Utilities	Cascade Utilities	OR	ILEC	2371	Cascade Utilities		Cascade Utilities & T-Mobile USA	01/01/04	
Clear Creek Mutual Telephone	Clear Creek Mutual Telephone	OR	ILEC	2363	Clear Creek Mutual Telephone		Clear Creek Mutual Telephone Company & T-Mobile USA	01/01/04	
Colton Telephone	Colton Telephone	OR	ILEC	2364	Colton Telephone		Colton Telephone Company & T-Mobile USA	01/01/04	
Gervais Telephone	Gervais Telephone	OR	ILEC	2373	Gervais Telephone		Gervais Telephone Company & T-Mobile USA	01/01/04	
Helix Telephone	Helix Telephone	OR	ILEC	2376	Helix Telephone		Helix Telephone Company & T-Mobile USA	01/01/04	
Molalla Communications	Molalla Communications	OR	ILEC	2383	Molalla Communications		Molalla Communications Company & T-Mobile USA	01/01/04	
Monitor Cooperative Telephone	Monitor Cooperative Telephone	OR	ILEC	2384	Monitor Cooperative Telephone		Monitor Cooperative Telephone Company & T-Mobile USA	01/01/04	
Monroe Telephona	Monroe Telephone	OR	ILEC	2385	Monroe Telephone		Monroe Telephone Company & T-Mobile USA	01/01/04	
Mt. Angel Telephone	Mt. Angel Telephone	OR	ILEC	2386	Mt. Angel Telephone		Mount Angel Telephone Company & T-Mobile USA	01/01/04	
Nehalem Telephone & Telegraph	Nehalem Telephone & Telegraph	OR	ILEC	2387	Nehalem Telephone & Telegraph		Nehalem Telephone & Telegraph Company & T-Mobile USA	01/01/04	
Peoples Telephone (Oregon)	Peoples Telephone	OR	ILEC	2391	Peoples Telephone		Peoples Telephone Company & T-Mobile USA	01/01/04	
Pioneer Telephone Cooperativa (Oregon)	Pioneer Telephone Cooperativa	OR	ILEC	2393	Pioneer Telephone Cooperativa		Pioneer Telephone Cooperativa & T-Mobile USA	01/01/04	
Qwest Oregon	Qwest Communications	OR	RBOC	9638	Qwest Communications	US West	Qwest Corporation & VoiceStream Wireless	11/12/01	
Scio Mutual Telephone Association	Scio Mutual Telephone Association	OR	ILEC	2397	Scio Mutual Telephone Association		Scio Mutual Telephone Association & T-Mobile USA	01/01/04	
Stayton Cooperative Telephone	Stayton Cooperative Telephone	OR	ILEC	2399	Stayton Cooperative Telephone		Stayton Cooperative Telephone Company & T-Mobile USA	01/01/04	
Verizon Northwest - OR	Verizon	OR	RBOC	4323	Verizon Communications	GTE	GTE Northwest & Western Wireless	01/24/97	

**T-Mobile**  
ETC DESIGNATED AREA



Company Name	
	Beaver Creek Cooperative Telephone Co.
	Canby Telephone Association
	Cascade Utilities Inc.
	CenturyTel of Eastern Oregon, Inc.
	CenturyTel of Oregon, Inc.
	Clear Creek Mutual Telephone Co.
	Colton Telephone Co.
	Frontier Communications Northwest, Inc. - OR
	Gervais Telephone Co.
	Helix Telephone Co.
	Malalla Telephone Co.
	Monitor Cooperative Telephone Co.
	Monroe Telephone Co.
	Mt. Angel Telephone Co.
	Nehalem Telecomms Inc.
	Peoples Tel Co
	Qwest Corporation
	Qwest Corporation (OR portion only)
	Roome Telecommunications, Inc
	Scio Mutual Telephone Association
	St Paul Cooperative Telephone Association
	Stayton Cooperative Telephone Co.
	United Telephone of the Northwest

*T-Mobile has licenses to serve throughout Oregon*

# Lifeline Notice

**Check to see if you qualify for discounted monthly wireless service.**

## Save money with Lifeline

T-Mobile® customers in Washington may be eligible to receive discounted wireless telecommunications service of \$6.49 per month (or \$1 per month for qualifying residents of federally recognized tribal lands) under the Lifeline program and a one-time reduced activation fee under the Link Up program.

## Qualifying for Lifeline and/or Link Up

In Washington, customers may qualify for Lifeline and/or Link Up assistance if they are currently eligible to receive benefits from any of the following assistance programs:

- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (including Section 8)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program (must qualify for free lunch)
- Temporary Assistance for Needy Families (TANF)

Additionally, residents of Washington might qualify for Lifeline and/or Link Up if their total household income does not exceed 135% of the Federal Poverty Guidelines.

You must complete a T-Mobile Lifeline and Link Up application form for your state in order to receive Lifeline and/or Link Up benefits.

Customers who are also residents of federally recognized tribal lands may qualify for Lifeline/Link Up assistance under the assistance programs listed or if they are currently eligible to receive benefits from any of the following assistance programs:

- Bureau of Indian Affairs General Assistance
- Tribal Temporary Assistance for Needy Families (TTANF)
- Head Start (must satisfy income-qualifying standard)

## Additional Information & Signing Up

For additional information or to sign up for T-Mobile's Lifeline and Link Up offerings call USLifeline at 1-800-937-8997.

T-Mobile currently offers Lifeline/Link Up service only in areas where the company has Eligible Telecommunications Carrier status.

You may find more information about Lifeline and other wireless services available from T-Mobile USA, Inc. at [www.T-Mobile.com](http://www.T-Mobile.com).



# Universal Service Notice

T-Mobile offers several different rate plans that include all of the following services supported by the federal universal service fund: voice grade access; local usage in varying amounts; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and, for Lifeline subscribers, toll limitation. T-Mobile customers also may be eligible to receive reduced rate service at \$6.49 per month plus applicable taxes and fees under the Lifeline program if they satisfy applicable criteria. Individuals should contact Department of Social Services, Social Security, or Housing Authority/ Section 8 to determine if they qualify for Lifeline service. Lifeline service, including toll blocking at no additional charge, is only available in certain areas. For more information about T-Mobile's Lifeline offering, call USLifeline directly at 800-866-2453.

See brochure and **T-Mobile's Terms and Conditions (including arbitration provision)** at [T-Mobile.com](http://T-Mobile.com) for rate plan information, changes for features and services, and restrictions and details. T-Mobile and the magenta color are trademarks of the Deutsche Telecom AG. stick together is a trademark of T-Mobile USA, Inc. © 2009 T-Mobile USA, Inc



# T-Mobile® Value Plans for Individuals

T-Mobile offers a variety of rate plans, so you can pick the perfect plan. All of the Value plans have UNLIMITED nationwide T-Mobile to T-Mobile calling and UNLIMITED Nights and Weekends. A two-year contract is required. All unlimited data plans are unlimited while on T-Mobile's network.

## Buy a phone or use one you already have.

With T-Mobile's Value plans, you can either use your own phone, or purchase a new one with our convenient Equipment Installment Plan. Our Equipment Installment Plan lets you spread out the cost of a new phone over time with interest-free payments. A down payment is due upon purchase, and remaining payments will be charged to your monthly bill over time. It's that easy. Don't forget to ask about Premium Handset Protection® for your phone. It's an affordable way to protect your investment and enjoy peace of mind.

Value Individual Plans				
Price	Talk	Text	Data	Recommended for:
\$104.99	Unlimited	Unlimited	Unlimited – Ultra with up to 10 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent or extended use of streaming activities</li> <li>Regular use of smartphone as mobile hotspot (available at an additional monthly charge)</li> <li>Plus all activities listed below</li> </ul>
\$94.99	500 Whenever Minutes®	Unlimited		
\$74.99	Unlimited	Unlimited	Unlimited – Premium with up to 5 GB of high-speed data	<p><b>The Unlimited Value™ – Premium 5 GB plan gives you the premier 4G experience on your smartphone, at a great value.</b></p> <ul style="list-style-type: none"> <li>Frequent email and email with attachments</li> <li>Regular Web surfing, online gaming or navigation</li> <li>Social networking posts and photo/video uploads</li> <li>Downloading music, games and movies</li> <li>Streaming music, TV, movies and video chat</li> <li>Occasional use of smartphone as mobile hotspot (available at an additional monthly charge)</li> </ul>
\$64.99	500 Whenever Minutes	Unlimited		
\$59.99	Unlimited	Unlimited	Unlimited – Plus with up to 2 GB of high-speed data	<ul style="list-style-type: none"> <li>Occasional email</li> <li>Occasional Web surfing (checking news, weather and sports scores)</li> <li>Navigation</li> <li>Social networking posts and photo uploads</li> </ul>
\$49.99	500 Whenever Minutes	Unlimited		
\$49.99	Unlimited	Unlimited		
\$44.99	1000 Whenever Minutes	Unlimited		<p><b>How much high-speed data do you need?</b></p> <ul style="list-style-type: none"> <li>With T-Mobile's unlimited data plans (2 GB, 5 GB and 10 GB of high-speed data), you'll never have surprise costs or be cut off.</li> <li>If you use more high-speed data than your unlimited plan covers, we simply allow you to access the Web at up to 2G speeds.</li> <li>You can upgrade to a bigger data plan at any time.</li> </ul>
\$39.99	500 Whenever Minutes	Unlimited		
\$34.99	500 Whenever Minutes			

**Add 200 MB of full-speed data to Talk + Text plans for just \$5 more per month per line. Overages are 10¢ per MB.**

Prices reflect monthly recurring charges; taxes and fees additional. Text plans include unlimited nationwide text and picture and video messaging.

The ability to send/receive messages is included with all T-Mobile service, and the ability to access data (e.g., the Web) is included with all post-paid service, on compatible devices. Some plans and features include unlimited messaging/data or message/data allotments. If you don't have a plan or feature that includes messaging/data, messages you send/receive and data that you use will be charged to your account on a per use basis. See [www.T-Mobile.com](http://www.T-Mobile.com) for messaging/data rates and for message blocking and data usage opt-out options.



**Still have questions? See a Sales Associate, or visit our online data calculator at [www.T-Mobile.com/calculator](http://www.T-Mobile.com/calculator)**

**All Pricing:** Limited-time offers; subject to change. Taxes and fees additional. Post-paid only. Rates apply only to services used and calls originating and received within the U.S. (unless stated otherwise). International use incurs additional separate charges. Compatible device required; not all features or plans available on all devices. **Unlimited features for direct U.S. communications between two people.** **General Terms:** Credit approval, \$35 per line activation fee, deposit and two-year agreement with up to \$200/line early cancellation fee required; deposit may apply. If you switch plans you may be bound by existing or extended contract term (including early cancellation provisions) and/or charged an up to \$200 fee. You may be unable to switch to some plans. Additional requirements may apply to business customers; Premier and other business/association discounts may not be available. Regulatory Programs Fee (not a tax or government-mandated charge) of up to \$1.61 per line/month applies. Taxes approximately 6%–28% of your monthly bill. Overage usage extra; partial minutes/megabytes rounded up. Talk overage charge of \$0.45/minute. Some calls/features involve multiple calls; each call incurs separate charges. For unlimited data plans, full speeds available up to monthly allotment; then slowed to up to 2G speeds for the rest of billing cycle. On-network and domestic roaming data allotments differ: 200 MB full-speed plan includes 10 MB roaming; 2 GB full-speed plan includes 50 MB roaming; 5 GB full-speed plan includes 100 MB roaming; 10 GB full-speed plan includes 200 MB roaming; and Mobile Web Pay Per Use includes 10 MB roaming. For post-paid 200 MB plan, overage of \$0.10/MB after monthly allotment used. **Nights and Weekends:** Weekends are midnight Friday to midnight Sunday, and nights are 9:00 p.m. to 6:59 a.m. Monday–Friday, based upon start time of call. Different terms apply to FlexPay and prepaid. **T-Mobile to T-Mobile** calls are directly dialed between T-Mobile customer devices while on the T-Mobile USA network (and not roaming on any domestic or international network); calls to voicemail and other T-Mobile service numbers not included. **Smartphone Mobile HotSpot:** Plan data allotment applies. Use of connected devices subject to T-Mobile's terms and conditions. **Apps and Third-Party Content:** Use of some content, features or services may incur separate, additional charges and/or require a qualifying data plan, or access to Wi-Fi connection. **Coverage:** Not available everywhere. **Abnormal Usage:** Service may be slowed, suspended, terminated or restricted for misuse, abnormal use, interference with our network or ability to provide quality service to other users, or significant roaming. **Equipment Installment Plan:** Availability and amount of EIP financing subject to credit approval. Down payment required at time of purchase. Remaining payments to be made evenly over time; EIP not available in Washington, D.C. Qualifying rate plans required, and account must remain in good standing. Taxes, late/non-payment fees and other upfront and monthly charges may apply. Available only at participating locations; see store for details. **Bill Details:** Your bill summarizes your charges, fees and taxes, but does not include the details of services used. You may view bill details at [my.T-Mobile.com](http://my.T-Mobile.com) or, for an additional charge, we will provide detailed bills. We do not provide bills to FlexPay and prepaid customers. See brochures and **Terms and Conditions (including arbitration provision)** at [www.T-Mobile.com](http://www.T-Mobile.com) for additional information. T-Mobile and the magenta color are registered trademarks of Deutsche Telekom AG. Whenever Minutes and Premium Handset Protection are registered trademarks, and Unlimited Value is a trademark, of T-Mobile USA, Inc. © 2012 T-Mobile USA, Inc.

# T-Mobile® Value Plans for Families

T-Mobile offers a variety of rate plans, so you can pick the perfect plan for your family. All of the Value plans have UNLIMITED nationwide T-Mobile to T-Mobile calling and UNLIMITED Nights and Weekends. A two-year contract is required. All unlimited data plans are unlimited while on T-Mobile's network.

## Buy a phone or use one you already have.

With T-Mobile's Value plans, you can either use your own phone, or purchase a new one with our convenient Equipment Installment Plan. Our Equipment Installment Plan lets you spread out the cost of a new phone over time with interest-free payments. A down payment is due upon purchase, and remaining payments will be charged to your monthly bill over time. It's that easy. Don't forget to ask about Premium Handset Protection® for your phone. It's an affordable way to protect your investment and enjoy peace of mind.

Value Family Plans				Recommended for:
Price (per line)	Talk*	Text	Data	
\$94 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited-Ultra</b> with up to 10 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent or extended use of streaming activities</li> <li>Regular use of smartphone as mobile hotspot (available at an additional monthly charge)</li> <li>Plus all activities listed below</li> </ul>
\$84 <sup>99</sup>	1000 Whenever Minutes®	Unlimited		
\$64 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited-Premium</b> with up to 5 GB of high-speed data	<p><b>The Unlimited Value™-Premium 5 GB plan gives you the premier 4G experience on your smartphone, at a great value.</b></p> <ul style="list-style-type: none"> <li>Frequent email and email with attachments</li> <li>Regular Web surfing, online gaming or navigation</li> <li>Social networking posts and photo/video uploads</li> <li>Downloading music, games and movies</li> <li>Streaming music, TV, movies and video chat</li> <li>Occasional use of smartphone as mobile hotspot (available at an additional monthly charge)</li> </ul>
\$54 <sup>99</sup>	1000 Whenever Minutes	Unlimited		
\$49 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited-Plus</b> with up to 2 GB of high-speed data	<ul style="list-style-type: none"> <li>Occasional email</li> <li>Occasional Web surfing (checking news, weather and sports scores)</li> <li>Navigation</li> <li>Social networking posts and photo uploads</li> </ul>
\$39 <sup>99</sup>	1000 Whenever Minutes	Unlimited		
\$39 <sup>99</sup>	Unlimited	Unlimited		
\$34 <sup>99</sup>	2000 Whenever Minutes	Unlimited	—	
\$29 <sup>99</sup>	1000 Whenever Minutes	Unlimited		
\$24 <sup>99</sup>	1000 Whenever Minutes	—		

### How much high-speed data do you need?

- With T-Mobile's unlimited data plans (2 GB, 5 GB and 10 GB of high-speed data), you'll never have surprise costs or be cut off.
- If you use more high-speed data than your unlimited plan covers, we simply allow you to access the Web at up to 2G speeds.
- You can upgrade to a bigger data plan at any time.

\* Whenever Minutes are shared by the two lines.

Prices reflect monthly recurring charges per line for each of your first two lines; two-line minimum.

Taxes and fees additional. Text plans include unlimited nationwide text and picture and video messaging.

Add a Line (Talk)		Add Data	
<b>Unlimited Value™ Add a Line</b> — only available with <b>Unlimited Value</b> plans	\$25	<b>Unlimited-Ultra</b> — with up to 10 GB of high-speed data	\$55
<b>500 Value Add a Line</b> — 500 Whenever Minutes per line, only available on <b>Unlimited Value</b> plans	\$5	<b>Unlimited-Premium</b> — with up to 5 GB of high-speed data	\$25
<b>Shared Minute Value Add a Line</b> — shares existing Whenever Minutes; only available on <b>Minute Value™</b> plans	\$5	<b>Unlimited-Plus</b> — with up to 2 GB of high-speed data	\$10
		<b>Simple</b> — with 200 MB of full-speed data. Overages are 10¢ per MB.	\$5

### Unlimited Any Mobile™ Calling

Get unlimited data, with up to 2 GB of high-speed data, text and calls to any mobile, plus 500 Whenever Minutes (only available on Unlimited Value plans) \$25

Prices in these Add-a-Line tables reflect monthly recurring charges per line; taxes and fees additional. Adding data for additional lines requires an add-a-line talk plan; stand-alone data plans not available. All family plans with unlimited text provide unlimited text for all additional lines.

The ability to send/receive messages is included with all T-Mobile service, and the ability to access data (e.g., the Web) is included with all post-paid service, on compatible devices. Some plans and features include unlimited messaging/data or message/data allotments. If you don't have a plan or feature that includes messaging/data, messages you send/receive and data that you use will be charged to your account on a per-use basis. See [www.T-Mobile.com](http://www.T-Mobile.com) for messaging/data rates and for message blocking and data usage opt-out options.



Still have questions? See a Sales Associate, or visit our online data calculator at [www.T-Mobile.com/calculator](http://www.T-Mobile.com/calculator)

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# T-Mobile® Classic Plans for Individuals

T-Mobile offers a variety of rate plans, so you can pick the perfect plan. All of the Classic plans come with great phone discounts, UNLIMITED nationwide T-Mobile to T-Mobile calling and UNLIMITED Nights and Weekends. A two-year contract is required.

All unlimited data plans are unlimited while on T-Mobile's network.

Classic Individual Plans				
Price	Talk	Text	Data	Recommended for:
\$124 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited – Ultra</b> with up to 10 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent or extended use of streaming activities</li> <li>Regular use of smartphone as mobile hotspot (available at an additional monthly charge)</li> <li>Plus all activities listed below</li> </ul>
\$114 <sup>99</sup>	500 Whenever Minutes®	Unlimited		
\$94 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited – Premium</b> with up to 5 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent email and email with attachments</li> <li>Regular Web surfing, online gaming or navigation</li> <li>Social networking posts and photo/video uploads</li> <li>Downloading music, games and movies</li> <li>Streaming music, TV, movies and video chat</li> <li>Occasional use of smartphone as mobile hotspot (available at an additional monthly charge)</li> </ul>
\$84 <sup>99</sup>	500 Whenever Minutes	Unlimited		
\$79 <sup>99</sup>	Unlimited	Unlimited	<b>Unlimited – Plus</b> with up to 2 GB of high-speed data	<ul style="list-style-type: none"> <li>Occasional email</li> <li>Occasional Web surfing (checking news, weather and sports scores)</li> <li>Navigation</li> <li>Social networking posts and photo uploads</li> </ul>
\$69 <sup>99</sup>	500 Whenever Minutes	Unlimited		
\$59 <sup>99</sup>	Unlimited	Unlimited		
\$49 <sup>99</sup>	1000 Whenever Minutes	–	–	<p><b>How much high-speed data do you need?</b></p> <ul style="list-style-type: none"> <li>With T-Mobile's unlimited data plans (2 GB, 5 GB and 10 GB of high-speed data), you'll never have surprise costs or be cut off.</li> <li>If you use more high-speed data than your unlimited plan covers, we simply allow you to access the Web at up to 2G speeds.</li> <li>You can upgrade to a bigger data plan at any time.</li> </ul>
\$49 <sup>99</sup>	500 Whenever Minutes	Unlimited		
\$39 <sup>99</sup>	500 Whenever Minutes	–		

Add 200 MB of full-speed data to Talk + Text plans for just \$10 more per month per line. Overages are 10¢ per MB.

Prices reflect monthly recurring charges; taxes and fees additional. Text plans include unlimited nationwide text and picture and video messaging.

The ability to send/receive messages is included with all T-Mobile service, and the ability to access data (e.g., the Web) is included with all post-paid service, on compatible devices. Some plans and features include unlimited messaging/data or message/data allotments. If you don't have a plan or feature that includes messaging/data, messages you send/receive and data that you use will be charged to your account on a per use basis. See [www.T-Mobile.com](http://www.T-Mobile.com) for messaging/data rates and for message blocking and data usage opt-out options.



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# T-Mobile® Classic Plans for Families

T-Mobile offers a variety of rate plans, so you can pick the perfect plan for your family. All of the Classic plans have UNLIMITED nationwide T-Mobile to T-Mobile calling and UNLIMITED Nights and Weekends. A two-year contract is required. All unlimited data plans are unlimited while on T-Mobile's network.

Classic Family Plans				Recommended for:
Price (per line)	Talk*	Text	Data	
\$114.99	Unlimited	Unlimited	<b>Unlimited-Ultra</b> with up to 10 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent or extended use of streaming activities</li> <li>Regular use of smartphone as mobile hotspot (available at an additional monthly charge)</li> <li>Plus all activities listed below</li> </ul>
\$104.99	1000 Whenever Minutes®	Unlimited		
\$84.99	Unlimited	Unlimited	<b>Unlimited-Premium</b> with up to 5 GB of high-speed data	<ul style="list-style-type: none"> <li>Frequent email and email with attachments</li> <li>Regular Web surfing, online gaming or navigation</li> <li>Social networking posts and photo/video uploads</li> <li>Downloading music, games and movies</li> <li>Streaming music, TV, movies and video chat</li> <li>Occasional use of smartphone as mobile hotspot (available at an additional monthly charge)</li> </ul>
\$74.99	1000 Whenever Minutes	Unlimited		
\$69.99	Unlimited	Unlimited	<b>Unlimited-Plus</b> with up to 2 GB of high-speed data	<ul style="list-style-type: none"> <li>Occasional email</li> <li>Occasional Web surfing (checking news, weather and sports scores)</li> <li>Navigation</li> <li>Social networking posts and photo uploads</li> </ul>
\$59.99	1000 Whenever Minutes	Unlimited		
\$49.99	Unlimited	Unlimited		
\$39.99	2000 Whenever Minutes	—	—	
\$39.99	1000 Whenever Minutes	Unlimited		
\$29.99	1000 Whenever Minutes	—		

### How much high-speed data do you need?

- With T-Mobile's unlimited data plans (2 GB, 5 GB and 10 GB of high-speed data), you'll never have surprise costs or be cut off.
- If you use more high-speed data than your unlimited plan covers, we simply allow you to access the Web at up to 2G speeds.
- You can upgrade to a bigger data plan at any time.

\* Whenever Minutes are shared by the two lines.

Prices reflect monthly recurring charges per line for each of your first two lines; two-line minimum. Taxes and fees additional. Text plans include unlimited nationwide text and picture and video messaging.

Add a Line (Talk)	
<b>Classic Unlimited® Add a Line</b> — only available with <b>Classic Unlimited</b> plans	\$30
<b>Classic 500 Add a Line</b> — 500 Whenever Minutes per line, only available on <b>Classic Unlimited</b> plans	\$10
<b>Classic Shared Minute Add a Line</b> — shares existing Whenever Minutes; only available on <b>Classic Minute™</b> plans	\$10

Add Data	
<b>Unlimited-Ultra</b> — with up to 10 GB of high-speed data	\$65
<b>Unlimited-Premium</b> — with up to 5 GB of high-speed data	\$35
<b>Unlimited-Plus</b> — with up to 2 GB of high-speed data	\$20
<b>Simple</b> — with 200 MB of full-speed data. Overages are 10¢ per MB.	\$10

Unlimited Any Mobile™ Calling	
Get unlimited data, with up to 2 GB of high-speed data, text and calls to any mobile, plus 500 Whenever Minutes (only available on <b>Classic Unlimited</b> family plans)	\$40

Prices in these Add-a-Line tables reflect monthly recurring charges per line; taxes and fees additional. Adding data for additional lines requires an add-a-line talk plan; stand-alone data plans not available. All family plans with unlimited text provide unlimited text for all additional lines.

The ability to send/receive messages is included with all T-Mobile service, and the ability to access data (e.g., the Web) is included with all post-paid service, on compatible devices. Some plans and features include unlimited messaging/data or message/data allotments. If you don't have a plan or feature that includes messaging/data, messages you send/receive and data that you use will be charged to your account on a per use basis. See [www.T-Mobile.com](http://www.T-Mobile.com) for messaging/data rates and for message blocking and data usage opt-out options.



**Still have questions? See a Sales Associate, or visit our online data calculator at [www.T-Mobile.com/calculator](http://www.T-Mobile.com/calculator)**

**All Pricing:** Limited-time offers; subject to change. Taxes and fees additional. Post-paid only. Rates apply only to services used and calls originating and received within the U.S. (unless stated otherwise). International use incurs additional separate charges. Compatible device required; not all features or plans available on all devices. **Unlimited features for direct U.S. communications between two people.** **General Terms:** Credit approval, \$35 per line activation fee and two-year agreement with up to \$200/line early cancellation fee required; deposit may apply. If you switch plans you may be bound by existing or extended contract term (including early cancellation provisions) and/or charged an up to \$200 fee. You may be unable to switch to some plans. Additional requirements may apply to business customers; Premier and other business/association discounts may not be available. Regulatory Programs Fee (not a tax or government-mandated charge) of up to \$1.61 per line/month applies. Taxes approximately 6%–28% of your monthly bill. Overage usage extra; partial minutes/megabytes rounded up. Talk overage charge of \$0.45/minute. Some calls/features involve multiple calls; each call incurs separate charges. For unlimited data plans, full speeds available up to monthly allotment; then slowed to up to 2G speeds for rest of billing cycle. On-network and domestic roaming data allotments differ: 200 MB full-speed plan includes 10 MB roaming; 2 GB full-speed plan includes 50 MB roaming; 5 GB full-speed plan includes 100 MB roaming; 10 GB full-speed plan includes 200 MB roaming; and Mobile Web Pay Per Use includes 10 MB roaming. For post-paid 200 MB plan, overage of \$0.10/MB after monthly allotment used. **Nights and Weekends:** Weekends are midnight Friday to midnight Sunday, and nights are 9:00 p.m. to 6:59 a.m. Monday–Friday, based upon start time of call. Different terms apply to FlexPay and prepaid. **Family Plans:** Limit five lines. All lines must be activated in the same T-Mobile market with the same billing address and area code. **T-Mobile to T-Mobile** calls are directly dialed between T-Mobile customer devices while on the T-Mobile USA network (and not roaming on any domestic or international network); calls to voicemail and other T-Mobile service numbers not included. **Unlimited Any Mobile:** Applies to calls between T-Mobile customer devices and mobile phones in the U.S. and Puerto Rico; international calls and calls to voicemail and other T-Mobile service numbers not included. **Smartphone Mobile HotSpot:** Plan data allotment applies. Use of connected devices subject to T-Mobile terms and conditions. **Apps and Third-Party Content:** Use of some content, features or services may incur separate, additional charges and/or require a qualifying data plan or access to Wi-Fi connection. **Coverage:** Not available everywhere. **Abnormal Usage:** Service may be slowed, suspended, terminated or restricted for misuse, abnormal use, interference with our network or ability to provide quality service to other users, or significant roaming. **Bill Details:** Your bill summarizes your charges, fees and taxes, but does not include the details of services used. You may view bill details at [my.T-Mobile.com](http://my.T-Mobile.com) or, for an additional charge, we will provide detailed bills. We do not provide bills to FlexPay and prepaid customers. See brochures and **Terms and Conditions (including arbitration provision)** at [www.T-Mobile.com](http://www.T-Mobile.com) for additional information. T-Mobile and the magenta color are registered trademarks of Deutsche Telekom AG. Whenever Minutes and Classic Unlimited are registered trademarks, and Classic Minute and Unlimited Any Mobile are trademarks, of T-Mobile USA, Inc. © 2012 T-Mobile USA, Inc.

EXHIBIT G IS CONFIDENTIAL  
AND WILL BE SENT UNDER  
SEPARATE COVER



Steve Largent  
President/CEO

October 7, 2011

Ms. Kelsey Joyce  
Director of Legal Affairs  
Marketing  
T-Mobile USA, Inc.  
12920 SE 38<sup>th</sup> Street  
Bellevue, WA 98006

Dear Kelsey:

Congratulations! This letter is to notify you that T-Mobile USA ("T-Mobile") has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2011 – December 31, 2011, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, T-Mobile 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 T-Mobile 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 T-Mobile'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 Andrea Williams, CTIA's Vice President of Law and Assistant General Counsel, at (202) 736-3215 or [awilliams@ctia.org](mailto:awilliams@ctia.org).

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

Sincerely,

*Congratulations!*

*Steve Largent*  
Steve Largent

Attachment

cc: Philipp Humm  
Dave Miller



Oregon Telephone Assistance Program (OTAP) Application  
for Eligible Telecommunications Provider (ETP) to provide OTAP Services

Part I. Application Information and Service Plan

1. Contact information pertaining to your designated staff who would be handling OTAP communications:

Name: Rhonda R. Thomas




Address: 12920 SE 38<sup>th</sup> Street

City: Bellevue State: WA Zip: 98006

Phone number: 425-383-4215 Fax: 425-383-6380

E-Mail: rhonda.thomas63@t-mobile.com

2. The number of residential, business and tribal basic service customers served by the applicant as of December 31, of the most recent calendar year.

Residential -   
Business -   
Tribal - 

Part II. Conditions to Provide OTAP Services to Qualifying Oregonians

These conditions apply in addition to the general conditions of certification. Violating these conditions, or misrepresenting information provided to PUC in the course of administering the OTAP programs may result in cancellation of your authority to provide OTAP Services and/or an order requiring you to refund with interest and penalties of any OTAP support distributed under false information.

1. The applicant agrees to offer reduced residential rates with all service offerings that include basic telephone or cellular service to eligible low-income customers pursuant to the Oregon Telephone Assistance program (OTAP).
2. The applicant understands that only PUC may approve OTAP benefits for the consumer and provide benefits to OTAP consumers after PUC has notified the applicant of their eligibility. A telecommunication provider who grants OTAP benefits to ineligible customers will have the total amount of the OTAP benefits that were given to those customers deducted from the monthly or quarterly OTAP reimbursement invoices that the telecommunications provider submits to the Commission.

3. The applicant agrees that they will ensure the consumer will see their OTAP credit within 30 days from the date that the applicant has been notified of the consumer's eligibility status, and to remove consumers within 30 days after they no longer qualify for OTAP benefits.
4. The applicant agrees that they will submit reports for reimbursement quarterly (if they have less than 1,000 OTAP consumers) or monthly (if they have more than 1,000 OTAP consumers). Reports are expected to be submitted even if there are zero consumers.
5. An OTAP recipient is required to be the named subscriber<sup>1</sup> to the local telecommunication service in order for that household to qualify for OTAP benefits. PUC may waive this requirement if it determines that good cause exists. Applicant agrees to comply with reimbursing OTAP consumers who are not named subscribers at the Commission's request.
6. The applicant agrees to apply Commission assigned OTAP identification numbers to its OTAP customers' accounts.
7. Based upon accounting procedures approved by the Commission, the applicant agrees to maintain accounting records so that costs associated with OTAP can be separately identified. Records must be provided to the Commission upon request.
  - a. **Active OTAP Customer Report:** The applicant agrees to submit an Active OTAP Customer Report listing the names of all customers with the Commission assigned identification number receiving the OTAP benefits. Applicants with 1,000 or more OTAP customers must submit the report monthly to the Commission Applicants with fewer than 1,000 OTAP customers must submit the report quarterly to the Commission.
  - b. **Order Activity Report:** The applicant agrees to submit an Order Activity Report listing the names of all OTAP customers with the Commission assigned identification number whose service was disconnected. The applicant is aware that the Commission may require additional information such as a listing of all OTAP customers whose telephone numbers or addresses have changed.
  - c. **No Match Report:** The applicant agrees to notify the Commission of any discrepancy that prevents a customer from receiving the OTAP benefit after the Commission has notified the applicant of customers who meet eligibility criteria on a weekly basis.

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<sup>1</sup> Commission approved consumers must be the account responsible party to be eligible for Lifeline and/or Link Up benefits.

8. The applicant agrees to ensure that confidential information (including phone number, addresses, contact information, etc.) of OTAP recipients is protected (OAR 860-033-0010). The applicant agrees to maintain a written policy to ensure that the applicant's staff does not breach the confidentiality of OTAP consumers, and to do background checks on employees who have access to customer records.
9. The applicant agrees to have in place database encryption and firewall technologies to protect customer service information stored electronically.



APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, STATE LAW AND THE CONDITIONS OF CERTIFICATION. PLEASE INITIAL BOX AT LEFT.

  
\_\_\_\_\_  
Signature of person authorized to represent applicant

Vice President, Tax  
\_\_\_\_\_  
Title

H. Skip Cornett  
\_\_\_\_\_  
Printed Name

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Date

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## Certificate of Service

I hereby certify that I served a true and correct copy of the foregoing document In Docket UM 1511 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below Copies of Confidential Exhibits B, G and I (page 1 only) have been mailed separately to the parties in accordance with Protective Order No. 10-477.

Celeste Hari  
Public Utility Commission of Oregon  
PO Box 2148  
Salem OR 97308-2148  
celeste.hari@state.or.us

Jon Cray  
Public Utility Commission of Oregon  
550 Capitol St NE, Suite 215  
Salem OR 97301  
jon.cray@state.or.us

Johanna Riemenschneider  
Oregon Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096  
johanna.riemenschneider@doj.state.or.us

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McLean, VA 22102  
bharlow@fcclaw.com

Michael Dewey  
OCTA  
1249 Commercial Street SE  
Salem, OR 97302  
mdewey@oregoncable.com

DATED: April 20, 2012.

  
Candace Duncan  
Legal Assistant