

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

June 2, 2011

VIA ELECTRONIC MAIL AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97303 No. IC 15

Re: Docket UM 1511 – Direct Testimony

Enclosed for filing in the above-referenced docket is an original and five copies of the T-Mobile's Direct Testimony of Danieal Piekarczyk, Rhonda Thomas, and Gene DeJordy. The confidential portions of the testimony and the confidential Exhibits will be sent in a separate sealed envelope.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service. Please contact me with any questions.

Sincerely,

Handwritten signature of Wendy McIndoo in cursive script.

Wendy McIndoo
Office Manager

cc: Service List


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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.

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
Kay Marinos Public Utility Commission of Oregon PO Box 2148 Salem OR 97308-2148 kay.marinos@state.or.us	Gordon Feighner Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 gordon@oregoncub.org
G. Catriona McCracken Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org	John C. Sturm Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 john@oregoncub.org
Brooks Harlow Lukas, Nace, Gutierrez & Sachs, LLP 8300 Greensboro Drive, Suite 1200 McLean, VA 22102 bharlow@fcclaw.com	Michael Dewey OCTA 1249 Commercial Street SE Salem, OR 97302 mdewey@oregoncable.com
Paul Graham Oregon Department of Justice 1162 Court Street NE Salem, OR 97301-4096 paul.graham@state.or.us	

DATED: June 2, 2011.



Wendy McIndoo
Office Manager

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1511

IN THE MATTER OF T-MOBILE WEST)
CORPORATION'S APPLICATION FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER.)

T-MOBILE WEST CORPORATION

DIRECT TESTIMONY

OF

DANIEL PIEKARCZYK

June 2, 2011

1 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

2 **A.** My name is Daniel Piekarczyk. I am employed by T-Mobile USA, Inc. as Director &
3 Tax Counsel. My business address is 12920 SE 38th Street. Bellevue, Washington
4 98006.

5 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE AND EDUCATIONAL**
6 **BACKGROUND.**

7 **A.** I have been employed by T-Mobile USA, Inc. since 2004. In my current position, I
8 am responsible for a variety of areas including overall management of our Eligible
9 Telecommunications Carrier (“ETC”) program. Prior to my employment with T-
10 Mobile, I most recently worked for Global Crossing. I have my Juris Doctorate and
11 Bachelor of Science degrees from Indiana University in Bloomington, Indiana and I
12 am a member of the bar in the State of Maryland.

13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

14 **A.** The purpose of my testimony—together with the testimony of Company witnesses
15 Gene DeJordy and Rhonda Thomas—is to demonstrate to the Public Utility
16 Commission of Oregon (“Commission” or “OPUC”) that T-Mobile West Corporation
17 (“T-Mobile”) meets the requirements for designation as an ETC for the purposes of
18 receiving federal universal service support (“FUSF”) in Oregon as set forth in its
19 Application. I will provide background on T-Mobile’s certification as an ETC in other
20 states, and I will also address the overall requirements for designation as an ETC in
21 Oregon. Additional testimony supporting T-Mobile’s ETC designation will be
22 provided by:

- 23 • Rhonda Thomas, addressing the Company’s Lifeline offering, compliance
24 with Oregon OTAP requirements, service quality commitments and the
25 Company’s ability to remain functional in emergencies; and

26

- 1 • Gene DeJordy, addressing the Company's planned use of universal
2 service funding, specifically the Network Improvement Plan ("NIP"), and
3 benefits that Oregon consumers will realize as a result of T-Mobile's
4 designation as an ETC.

5
6 ***T-Mobile's ETC Designation in Other States and Territories***

7 **Q. IS T-MOBILE DESIGNATED AS AN ETC IN OTHER STATES OR TERRITORIES?**

8 **A.** Yes, T-Mobile and/or its affiliates are currently certified as an ETC in Puerto Rico,
9 North Carolina, Florida, Washington, Hawaii, and Kentucky; and in addition to
10 Oregon, T-Mobile has applications for ETC status pending in Georgia, Idaho,
11 Louisiana, Minnesota, Mississippi, and Texas. The Company (or a predecessor in
12 interest) received its certifications from the Telecommunications Regulatory Board in
13 Puerto Rico in 2003, and from state commissions in Kentucky, Florida and
14 Washington in 2010 and in Hawaii in 2011. In addition, in 2008 the Federal
15 Communications Commission ("FCC") designated T-Mobile as an ETC in North
16 Carolina.

17 **Q. DID THE STATE COMMISSIONS AND THE FCC DETERMINE THAT THE PUBLIC**
18 **INTEREST WOULD BE SERVED BY THE DESIGNATION OF T-MOBILE AS AN**
19 **ETC?**

20 **A.** Yes, in each of the jurisdictions where T-Mobile has been granted ETC status, the
21 state commission or the FCC determined that the public interest would be served by
22 designating T-Mobile as an ETC in areas served by both non-rural and rural
23 telephone companies.

24 **Q. HAS T-MOBILE EVER BEEN DENIED ETC STATUS IN A STATE, TERRITORY**
25 **OR AT THE FCC?**

- 1 3. use its own facilities or a combination of its own facilities and resale of
- 2 another carrier's services;
- 3 4. provide the supported services throughout the designated service area;
- 4 5. use the support funds only for the intended purposes;
- 5 6. advertise the availability of its universal service offerings and charges using
- 6 media of general distribution;
- 7 7. make Lifeline service available to qualified consumers;
- 8 8. maintain the ability to remain functional in emergencies;
- 9 9. meet service quality and consumer protection standards; and
- 10 10. demonstrate that the Company's designation as an ETC is in the public
- 11 interest.

12 **Q. DOES T-MOBILE'S APPLICATION SATISFY ALL OF THESE REQUIREMENTS?**

13 **A.**Yes, it does.

14 **Q. PLEASE DESCRIBE T-MOBILE'S STATUS AS A COMMON CARRIER?**

15 **A.**T-Mobile is a common carrier as required by Oregon Requirement 1 and 47 C.F.R. §
16 54.201(d). A "common carrier" is defined as a person engaged as a common carrier
17 on a for-hire basis in interstate communications by wire or radio (see 47 U.S.C.
18 Section 153(10)). The FCC rules classify personal communications service ("PCS")
19 as a common carrier service (see 47 C.F.R. Section 20.9(a)(11)). T-Mobile provides
20 PCS as a Commercial Mobile Radio Service ("CMRS") provider. T-Mobile has
21 licenses to provide common carrier PCS service in Oregon. T-Mobile is therefore a
22 common carrier for purposes of designation as an ETC.

23 **Q. DOES T-MOBILE OFFER THE SUPPORTED SERVICES?**

24 **A.**Yes, T-Mobile offers the supported services in all universal service offerings,
25 consistent with Oregon Requirement 2 and 47 C.F.R. § 54.101. The supported
26 services include the following:

- 1 • Voice-grade access to the public switched telephone network;
- 2 • Local usage;
- 3 • Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
- 4 • Single-party service or its functional equivalent;
- 5 • Access to emergency services;
- 6 • Access to operator services;
- 7 • Access to interexchange service;
- 8 • Access to directory assistance; and
- 9 • Toll limitation for qualifying low-income consumers.

10 Exhibit T-Mobile/101 provides a description of T-Mobile's standard rate plans (as of
11 December 2010) that offer supported services.

12 **Q. PLEASE DESCRIBE HOW T-MOBILE PROVIDES EACH OF THE SUPPORTED**
13 **SERVICES.**

14 **A. *Voice-grade access to the public switched telephone network:*** Voice-grade
15 access means the ability to transmit and receive voice communications within a
16 bandwidth between 300 and 3,000 Hertz frequency range. T-Mobile meets this
17 requirement by providing voice-grade access to the public switched telephone
18 network. Through its interconnection arrangements with other telecommunications
19 providers, all T-Mobile customers are able to transmit and receive calls on the public
20 switched telephone network within the specified bandwidth.

21 ***Local Usage:*** An ETC must include local usage in its universal service offerings.
22 There is no minimum amount of minutes of local usage that needs to be included in
23 universal service offerings, as long as there are some "free" minutes included in rate
24 plans. In each of its rate plans eligible for universal service support, T-Mobile offers
25 local usage with varying amounts of "free" minutes of use. All rate plans include
26 nationwide minutes which may be used for local calling. Consequently, all of the T-

1 Mobile rate plans offer local usage consistent with universal service offerings.

2 **Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent:**

3 DTMF is a method of signaling that facilitates the transportation of call set-up and
4 call detail information. T-Mobile uses the functional equivalent to DTMF, specifically
5 out-of-band digital signaling and in-band multi-frequency ("MF") signaling, which the
6 FCC concluded is the functional equivalent to DTMF in its *Universal Service Order*,
7 Federal-State Joint Board on Universal Service, *Report and Order*, 12 FCC Rcd
8 8776 (1997) (*Universal Service Order*).

9 **Single-party service or its functional equivalent:** Single-party service means only
10 one party is served by a subscriber loop or access line. T-Mobile offers the
11 equivalent of single-party service by providing a dedicated message path for the
12 length of a user's particular transmission, which the FCC concluded is the functional
13 equivalent to single party service in its *Universal Service Order*, Federal-State Joint
14 Board on Universal Service, *Report and Order*, 12 FCC Rcd 8776 (1997) (*Universal*
15 *Service Order*).

16 **Access to emergency services:** The ability to reach a public safety agency by
17 dialing 9-1-1 is a required service in any universal service offering. Phase II E911,
18 which includes both automatic numbering information ("ANI") and automatic location
19 information ("ALI") of the handset, is required if a 9-1-1 agency makes arrangements
20 for the delivery of such information. In Oregon, T-Mobile has worked with the Public
21 Safety Answering Points ("PSAPs") in each county and has implemented Phase I
22 and Phase II E-911 service in each county based upon the request for service,
23 where T-Mobile has coverage, and therefore meets the ETC requirement of
24 providing access to emergency services. T-Mobile is actively involved with the 911
25 community through activities with national 911 organizations, including National
26 Emergency Number Association ("NENA") and Association of the Public Safety

1 Communications Officials International ("APCO").

2 **Access to operator services:** Access to operator services is defined as any
3 automatic or live assistance to arrange for the billing and/or completion, of a
4 telephone call. T-Mobile meets this requirement by providing all of its customers with
5 access to operator services provided by the Company or a third party. In particular,
6 customers of T-Mobile can dial "0" to reach an operator, or "6-1-1" to reach customer
7 support for assistance in completing a call.

8 **Access to interexchange services:** T-Mobile meets this requirement by providing
9 all of its customers with the ability to make and receive interexchange or toll calls
10 through interconnection arrangements the Company has with other
11 telecommunications carriers. T-Mobile customers are able to dial any local or long-
12 distance telephone number in the United States, and are able to receive calls from
13 any local or long-distance telephone number meeting the ETC requirement of access
14 to interexchange services.

15 **Access to directory assistance.** The ability to place a call to directory assistance
16 is a required service offering. T-Mobile meets this requirement by providing all of its
17 customers with access to directory assistance by dialing "4-1-1."

18 **Toll limitation for qualified low-income consumers:** An ETC must offer either "toll
19 control" or "toll blocking" service to qualifying Lifeline customers at no charge. T-
20 Mobile will provide toll blocking to qualified Lifeline customers, at no charge, as part
21 of its Lifeline offerings. Lifeline customers, like most other T-Mobile customers,
22 typically do not incur long distance charges for calls within the United States, so toll
23 blocking is not necessary, but, to the extent any Lifeline offering now or in the future
24 does not include toll calls for no extra charge, then qualifying Lifeline customers will
25 have access to toll blocking at no charge.

26

1 **Q. AN ETC IS REQUIRED TO USE ITS OWN FACILITIES OR A COMBINATION OF**
2 **ITS OWN FACILITIES AND RESALE TO PROVIDE UNIVERSAL SERVICE. DOES**
3 **T-MOBILE HAVE ITS OWN FACILITIES, SUCH AS SWITCHING AND ANTENNA**
4 **TOWERS, TO BE USED FOR THE PROVISION OF UNIVERSAL SERVICE IN THE**
5 **PROPOSED ETC AREA?**

6 **A.** Yes. T-Mobile is a facilities-based CMRS provider with its own switching, network
7 facilities, cell sites, transmit and receive radios, and spectrum in Oregon, as required
8 by 47 C.F.R. § 201(d)(1). T-Mobile does not resell the services of another carrier,
9 but is a full service facilities-based carrier. T-Mobile has an extensive facilities-based
10 network in Oregon to serve consumers in its proposed ETC service area. Consistent
11 with Oregon Requirement 4, T-Mobile's Application describes network facilities used
12 to provide service, provides a map showing the extent of current network coverage
13 and signal strengths, and identifies current relevant interconnection agreements. A
14 copy of the map showing the Company's current network coverage in Oregon is
15 attached as confidential Exhibit T-Mobile/102. Also attached as Exhibit T-Mobile/103
16 is a list of T-Mobile's Interconnection Agreements

17 **Q. ONE OF THE REQUIREMENTS FOR DESIGNATION AS AN ETC IS THAT T-**
18 **MOBILE MUST COMMIT TO PROVIDING UNIVERSAL SERVICE THROUGHOUT**
19 **ITS PROPOSED DESIGNATED SERVICE AREA. IS T-MOBILE WILLING TO**
20 **MAKE THAT COMMITMENT?**

21 **A.** Yes. Consistent with Oregon Requirement 3 and 47 C.F.R. § 54.201(d), T-Mobile
22 commits to providing, and is able to provide, universal service throughout its
23 designated service area. Oregon Requirement 3 requires an applicant to
24 demonstrate its commitment and ability to do so by explicitly identifying the proposed
25 designated service area and committing to offer supported services throughout the
26 proposed service area and to provide service to all customers consistent with 47

1 CFR § 54.202(a)(1)(i). T-Mobile's Application fulfills these requirements.

2 **Q. WHAT IS T-MOBILE'S PROPOSED ETC SERVICE AREA?**

3 **A.** T-Mobile's proposed ETC service area includes the non-rural telephone company
4 wire centers and the rural telephone company study areas identified in Exhibit T-
5 Mobile/104. Also attached as Exhibit T-Mobile/105 is a map depicting our Oregon
6 ETC service areas.

7 **Q. DOES T-MOBILE HOLD RADIO LICENSES FROM THE FCC TO PROVIDE**
8 **SERVICE THROUGHOUT ITS PROPOSED ETC AREA?**

9 **A.** Yes.

10 **Q. FOR CONSUMERS WHO RESIDE WITHIN T-MOBILE'S PROPOSED ETC AREA,**
11 **BUT OUTSIDE OF ITS EXISTING COVERAGE, WHAT STEPS WILL T-MOBILE**
12 **UNDERTAKE TO MEET REQUESTS FOR SERVICE?**

13 **A.** To the extent that T-Mobile's network already passes or covers a potential
14 customer's premises, T-Mobile will provide service on a timely basis, and, in those
15 instances where a request comes from a potential customer within T-Mobile's
16 proposed ETC area, but outside its existing network coverage, T-Mobile will promptly
17 initiate an effort to provision service within a reasonable period of time by:

- 18 (1) modifying or replacing the requesting customer's equipment;
- 19 (2) deploying a roof-mounted antenna or other equipment;
- 20 (3) adjusting the nearest cell tower;
- 21 (4) adjusting network or customer facilities;
- 22 (5) reselling services from another carrier's facilities to provide service; or
- 23 (6) employing, leasing, or constructing an additional cell site, cell extender,
24 repeater, or other similar equipment.

25 If T-Mobile determines that it cannot reasonably serve a consumer, then it will report
26 the unfulfilled request within 30 days after making such determination. This is the

1 process established by the FCC in 47 C.F.R. § 54.202 and T-Mobile will follow this
2 process in providing service in its proposed ETC service area.

3 **Q. WILL THE COMPANY MAKE THE REQUIRED CERTIFICATIONS AS TO ITS USE**
4 **OF UNIVERSAL SERVICE FUNDS?**

5 A. Yes. Under Oregon Requirement 5, a carrier must (i) submit an affidavit certifying
6 use of universal service funds; (ii) provide copies of certifications filed with the FCC;
7 and (iii) submit a formal network improvement plan. A copy of the required affidavit
8 is attached as Exhibit T-Mobile/302 to Mr. DeJordy's testimony. In addition, attached
9 as Exhibit T-Mobile 106 is the Company's draft certifications that T-Mobile will submit
10 after it is designated as an ETC.

11 **Q. TURNING TO THE ADVERTISING REQUIREMENT, UPON DESIGNATION AS AN**
12 **ETC, WILL T-MOBILE ADVERTISE THE SUPPORTED SERVICES AND WHAT**
13 **TYPE OF ADVERTISING IS ENVISIONED?**

14 A. Yes. T-Mobile will advertise the supported services upon receiving ETC designation
15 using media of general distribution, such as newspapers, television, and/or radio, as
16 required by Oregon Requirement 6 and 47 U.S.C. § 214(e)(1)(B). Exhibit T-
17 Mobile/107 contains the text that T-Mobile will use to advertise its supported services
18 in areas where it is designated an ETC. In addition, T-Mobile maintains various retail
19 stores and authorized dealer locations throughout its ETC service area. Moreover, as
20 testified by Ms. Thomas, T-Mobile has implemented Lifeline advertising and outreach
21 initiatives in states where it has been designated as an ETC and will do the same in
22 Oregon upon designation.

23 **Q. WILL T-MOBILE OFFER LIFELINE SERVICE TO QUALIFYING LOW-INCOME**
24 **CONSUMERS CONSISTENT WITH ALL APPLICABLE REQUIREMENTS?**

25 A. Yes, as more fully explained in the testimony of Rhonda Thomas, T-Mobile will make
26 available discounted service offerings to qualifying low-income consumers that will

1 meet all applicable requirements, including those in Oregon Requirement 7 and 47
2 C.F.R. § 54.405.

3 **Q. DOES T-MOBILE HAVE THE ABILITY TO REMAIN FUNCTIONAL IN**
4 **EMERGENCIES?**

5 **A.** Yes. Ms. Thomas addresses this requirement in detail in her testimony.

6 **Q. DOES T-MOBILE COMMIT TO MEET SERVICE QUALITY AND CONSUMER**
7 **PROTECTION STANDARDS?**

8 **A.** Yes. Ms. Thomas also addresses this issue in her testimony.

9 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

10 **A.** T-Mobile meets all of the requirements for being an ETC and offers the supported
11 services in all universal service offerings. T-Mobile's Application provides the
12 information required by the Commission to demonstrate that T-Mobile meets the
13 requirements for being an ETC. Based on the information presented in my testimony
14 and the testimonies of Ms. Thomas and Mr. DeJordy, T-Mobile should be designated
15 as an ETC in Oregon.

16 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

17 **A.** Yes.

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T-Mobile/101
Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Standard Rate Plans

June 2011

Even More Rate Plans - Individuals
 (Even More and Even More Plus)

T-Mobile currently marketed and generally available plans as of 12/8/10. For additional terms and conditions, please see the T-Mobile Terms and Conditions available online at www.t-mobile.com. Promotional plans excluded.

Rate Plan	Highlights	Total Monthly Charge - Even More*	Total Monthly Charge - Even More Plus**
TALK (Individual)			
500 Minutes	500 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$39.99	\$29.99
1000 Minutes	1000 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$49.99	\$39.99
Unlimited Minutes	Unlimited Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
TALK & TEXT (Individual)			
500 Minutes & Unlimited Text	500 Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$49.99	\$39.99
1000 Minutes & Unlimited Text	1000 Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
Unlimited Minutes & Text	Unlimited Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$69.99	\$59.99

Even More Rate Plans - Individuals
 (Even More and Even More Plus)

TALK, TEXT, & WEB (Individual)			
500 Minutes, Unlimited Text, & Unlimited Web	500 Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$59.99
1000 Minutes, Unlimited Text, & Unlimited Web	1000 Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$89.99	\$69.99
Unlimited Minutes, Unlimited Text & Unlimited Web	Unlimited Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99

***Even More**

Handset discount available
 2 year contract required
 Finance handset (up to 4 months), subject to credit approval
 No fee to migrate
 Free domestic long distance and no digital roaming charges across the U.S.

****Even More Plus**

No subsidized handset pricing
 No annual contract
 Finance handset (up to 20 months), subject to credit approval
 Overage alerts
 May be a fee to migrate

Even More Rate Plans - Family
 (Even More and Even More Plus)

T-Mobile currently marketed and generally available plans as of 12/8/10. For additional terms and conditions, please see the T-Mobile Terms and Conditions available online at www.t-mobile.com. Promotional plans excluded.

Rate Plan	Highlights	Total Monthly Charge - Even More*	Total Monthly Charge - Even More Plus**
TALK (Family - 2 lines)			
750 Minutes	750 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
1500 Minutes	1500 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$59.99
3000 Minutes	3000 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99
Unlimited Talk	Unlimited Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99
TALK & TEXT (Family - 2 lines)			
750 Minutes & Unlimited Text	750 Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$69.99
1500 Minutes & Unlimited Text	1500 Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99
3000 Minutes & Unlimited Text	3000 Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$119.99	\$99.99
Unlimited Talk & Unlimited Text	Unlimited Whenever Minutes Unlimited domestic messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$119.99	\$99.99

Even More Rate Plans - Family
(Even More and Even More Plus)

TALK, TEXT, & WEB (Family - 2 lines)			
750 Minutes, Unlimited Text & Unlimited Web	750 Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$139.99	\$109.99
1500 Minutes, Unlimited Text & Unlimited Web	1500 Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$159.99	\$119.99
3000 Minutes, Unlimited Text & Unlimited Web	3000 Whenever Minutes Unlimited domestic messaging Unlimited Web Access Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$179.99	\$139.99
Unlimited Minutes, Unlimited Text & Unlimited Web	Unlimited Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$179.99	\$139.99

Additional Lines (maximum of 5 lines allowed on a family plan) can be added for as little as \$5 per month, per line for a limited time.

Family plans include two lines to start. You can add up to three more lines, for a total of five, if you're eligible.

Even More and Even More Plus Shared-minute Family Talk Plans (750, 1500 or 3000 minutes):

Plan	Minutes	Text	Included and Optional (Charged) Web Access		
Talk + Text plans	All lines share family talk minutes, and lines 3-5 are \$5 per month, per line.	All lines have unlimited text.	Not Available		
Talk + Text + Web plans	All lines share family talk minutes, and lines 3-5 are \$5 per month, per line.	All lines have unlimited text.	Lines 1 and 2 have Unlimited Web Access.		
			Lines 3-5 Optional Web Access:		
			Even More Unlimited Web for Smartphones:	Even More Plus Unlimited Web for Smartphones:	Even More and Even More Plus Unlimited Web for phones other than Smartphones:
			\$30.00/month	\$25.00/month	\$10.00/month

You can choose to purchase unlimited talk time for lines 3-5 for an additional charge.

Even More Rate Plans - Family
 (Even More and Even More Plus)

Even More and Even More Plus Unlimited Family Talk Plans:

Plan	Included and Optional (Charged) Minutes		Text	Included and Optional (Charged) Web Access		
Talk + Text plans	Lines 1 and 2 have unlimited talk minutes.		All lines have unlimited text.	Not Available		
	Lines 3-5 are \$10 per month, per line, and include 200 talk minutes. Optional (Charged) Unlimited Minutes for lines 3-5					
	Even More Unlimited Minutes:	Even More Plus Unlimited Minutes:				
	\$40.00/month	\$30.00/month				
Talk + Text + Web plans	Lines 1 and 2 have unlimited talk minutes.		All lines have unlimited text.	Lines 1 and 2 have Unlimited Web Access.		
	Lines 3-5 are \$10 per month, per line, and include 200 talk minutes. Optional (Charged) Unlimited Minutes for lines 3-5			Lines 3-5 Optional Web Access:		
	Even More Unlimited Minutes:	Even More Plus Unlimited Minutes:		Even More Unlimited Web for Smartphones:	Even More Plus Unlimited Web for Smartphones:	Even More and Even More Plus Unlimited Web for phones other than Smartphones:
	\$40.00/month	\$30.00/month		\$30.00/month	\$25.00/month	\$10.00/month
You can choose to purchase unlimited talk time for lines 3-5 for an additional charge.						

***Even More**
 Handset discount available
 2 year contract required
 Finance handset (up to 4 months), subject to credit approval
 No fee to migrate
 Free domestic long distance and no digital roaming charges across the U.S.

****Even More Plus**
 No subsidized handset pricing
 No annual contract
 Finance handset (up to 20 months), subject to credit approval
 Overage alerts
 May be a fee to migrate

T-Mobile® Even More®

Family Plans



Pick your plan.

Connect the way you want.

- Two-year contract required
- UNLIMITED nationwide T-Mobile to T-Mobile calling
- UNLIMITED Nights and Weekends
- WHENEVER Minutes® you can use to call ... whenever

Each family plan includes two lines that share the features described below.

WHENEVER Minutes (shared between two lines/mo.)	Talk	Talk + Text	Talk + Text + Web
Unlimited	\$99 ⁹⁹	\$119 ⁹⁹	\$179 ⁹⁹
1500	\$79 ⁹⁹	\$99 ⁹⁹	\$159 ⁹⁹
750	\$59 ⁹⁹	\$79 ⁹⁹	\$139 ⁹⁹

Prices reflect monthly recurring charges for two lines of service; taxes and fees additional. Text plans include unlimited nationwide text, IM, picture and video messaging. Web plans include unlimited nationwide Web and e-mail access.

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 for messaging/data rates and for message blocking and data usage opt-out options.

Add Web browsing in a snap.

Adding Web to any line is as simple as it is affordable.

Additional Add-ons	Monthly Cost Per Line
4G Web-Unlimited	\$30
4G Web-200 MB (overage at \$0.10/MB)	\$10

Taxes and fees additional. 4G Web-200MB plan not available on all smartphones. 4G Web plans provide access to data; capable device required to achieve 4G speeds.

See reverse for important restrictions and details.

Adding a line to your family plan is easy. T-Mobile/101
Piekarczyk/Page 7 of 13

Each family plan includes two lines of WHENEVER Minutes. Just figure out the number of WHENEVER Minutes you want for each additional line, then customize your plan to reflect your family's needs.

WHENEVER Minutes (for each additional line)	Monthly Cost Per Line
Unlimited (only available with Unlimited plan)	\$40
200 (only available with post-paid Unlimited plan)	\$15
Add a Line Shares existing WHENEVER Minutes (only available with 750/1500 minute plans)	\$10

Taxes and fees additional.

Optional features.

Don't forget to ask about Premium Handset Protection® to protect your investment.

Questions? Ask a Sales Associate or visit www.T-Mobile.com.



All Pricing: Limited-time offers; subject to change. Taxes and fees additional. Rates apply only to services used and calls originating and received within the U.S. (unless stated otherwise). International use incurs additional separate charges. 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 required. Up to \$200/line early cancellation fee applies to two-year agreements (ask Sales Associate for details and other options). If you switch plans you may be bound by existing contract term (and related \$200/line early cancellation fee) and \$35/line Even More Plus® activation fee may apply. 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 \$1.41 per line/month applies. Taxes approx. 6%-28% of your monthly bill. Overage usage extra; partial minutes/data rounded up. Some calls/features involve multiple calls; each call incurs separate charges. **FlexPay:** Per month, per line \$4.99 Control Charge applies (unless enrolled in Easy Pay). Promotional balances are non-refundable. **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. If on FlexPay, calls rated on a per minute basis. Different terms apply to Prepaid. **Family Plans:** Limit five lines. All lines of service must be activated in the same T-Mobile market and have 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. **Messaging:** You will be charged for all messages you send and that are sent to you even if they aren't received. Length/size of messages may be limited. **Web/Data:** Overage on 4G Web-200MB plan available to post-paid customers only; FlexPay customers may not exceed 200 MB allotment. Partial megabytes rounded up for billing. **Your data session, plan, or service may be slowed, suspended, terminated, or restricted** if you use your service in a way that interferes with or impacts our network or ability to provide quality service to other users, if you roam for a significant portion of your usage, or if you use a disproportionate amount of bandwidth during a billing cycle. You may not use your plan or device for prohibited uses. **Coverage:** Service and coverage not available everywhere. **Abnormal Usage:** Service may be limited or terminated for misuse, abnormal usage 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 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 for additional information. T-Mobile and the magenta color are registered trademarks of Deutsche Telekom AG. WHENEVER Minutes, stick together, Even More, Even More Plus and Premium Handset Protection are registered trademarks of T-Mobile USA, Inc. © 2010 T-Mobile USA, Inc.

T-Mobile® Even More® Individual Plans



Pick your plan.

Connect the way you want.

- Two-year contract required
- UNLIMITED nationwide T-Mobile to T-Mobile calling
- UNLIMITED Nights and Weekends
- WHENEVER Minutes® you can use to call ... whenever

WHENEVER Minutes	Talk	Talk + Text	Talk + Text + Web
Unlimited	\$59 ⁹⁹	\$69 ⁹⁹	\$99 ⁹⁹
1000	\$49 ⁹⁹	\$59 ⁹⁹	\$89 ⁹⁹
500	\$39 ⁹⁹	\$49 ⁹⁹	\$79 ⁹⁹

Prices reflect monthly recurring charges; taxes and fees additional. Text plans include unlimited nationwide text, IM, picture and video messaging. Web plans include unlimited nationwide Web and e-mail access.

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 for messaging/data rates and for message blocking and data usage opt-out options.

Add Web browsing in a snap.

Adding Web to any line is as simple as it is affordable.

Additional Add-ons	Monthly Cost
4G Web-Unlimited	\$30
4G Web-200 MB (overage at \$0.10/MB)	\$10

Taxes and fees additional. 4G Web-200MB plan not available on all smartphones. 4G Web plans provide access to data; capable device required to achieve 4G speeds.

Optional features.

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Don't forget to ask about Premium Handset Protection®
to protect your investment.

Questions? Ask a Sales Associate or visit www.T-Mobile.com.

T - Mobile® stick together®

All Pricing: Limited-time offers; subject to change. Taxes and fees additional. Rates apply only to services used and calls originating and received within the U.S. (unless stated otherwise). International use incurs additional separate charges. 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 required. Up to \$200/line early cancellation fee applies to two-year agreements (ask Sales Associate for details and other options). If you switch plans you may be bound by existing contract term (and related \$200/line early cancellation fee) and \$35/line Even More Plus® activation fee may apply. 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 \$1.41 per line/month applies. Taxes approx. 6%-28% of your monthly bill. Overage usage extra; partial minutes/data rounded up. Some calls/features involve multiple calls; each call incurs separate charges. **FlexPay:** Per month, per line \$4.99 Control Charge applies (unless enrolled in Easy Pay). Promotional balances are non-refundable. **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. If on FlexPay, calls rated on a per minute basis. Different terms apply to 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. **Messaging:** You will be charged for all messages you send and that are sent to you even if they aren't received. Length/size of messages may be limited. **Web/Data:** Overage on 4G Web-200MB plan available to post-paid customers only; FlexPay customers may not exceed 200 MB allotment. Partial megabytes rounded up for billing. **Your data session, plan, or service may be slowed, suspended, terminated, or restricted** if you use your service in a way that interferes with or impacts our network or ability to provide quality service to other users, if you roam for a significant portion of your usage, or if you use a disproportionate amount of bandwidth during a billing cycle. You may not use your plan or device for prohibited uses. **Coverage:** Service and coverage not available everywhere. **Abnormal Usage:** Service may be limited or terminated for misuse, abnormal usage 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 myt-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 for additional information. T-Mobile and the magenta color are registered trademarks of Deutsche Telekom AG. WHENEVER Minutes, stick together, Even More, Even More Plus and Premium Handset Protection are registered trademarks of T-Mobile USA, Inc. © 2010 T-Mobile USA, Inc.

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T-Mobile® Even More Plus®

Family Plans



Pick your plan.

Connect the way you want.

- No annual contract
- UNLIMITED nationwide T-Mobile to T-Mobile calling
- UNLIMITED Nights and Weekends
- FREE Overage Alerts
- WHENEVER Minutes® you can use to call ... whenever

Each family plan includes two lines that share the features described below.

WHENEVER Minutes (shared between two lines/mo.)	Talk	Talk + Text	Talk + Text + Web
Unlimited	\$79 ⁹⁹	\$99 ⁹⁹	\$139 ⁹⁹
1500	\$59 ⁹⁹	\$79 ⁹⁹	\$119 ⁹⁹
750	\$49 ⁹⁹	\$69 ⁹⁹	\$109 ⁹⁹

Prices reflect monthly recurring charges for two lines of service; taxes and fees additional. Text plans include unlimited nationwide text, IM, picture and video messaging. Web plans include unlimited nationwide Web and e-mail access.

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 for messaging/data rates and for message blocking and data usage opt-out options.

Add Web browsing in a snap.

Adding Web to any line is as simple as it is affordable.

Additional Add-ons	Monthly Cost Per Line
4G Web-Unlimited	\$25
4G Web-200 MB (overage at \$0.10/MB)	\$10

Taxes and fees additional. 4G Web-200MB plan not available on all smartphones. 4G Web plans provide access to data; capable device required to achieve 4G speeds.

Adding a line to your family plan is easy.

Each family plan includes two lines of WHENEVER Minutes. Just figure out the number of WHENEVER Minutes you want for each additional line, then customize your plan to reflect your family's needs.

WHENEVER Minutes (for each additional line)	Monthly Cost Per Line
Unlimited (Only available with Unlimited plan)	\$30
200 (Only available with post-paid Unlimited plan)	\$10
Add-a-line Shares existing WHENEVER Minutes (Only available with 750/1500 minute plans)	\$5

Taxes and fees additional.

Pick your phone.

Get the phone you really want with our convenient Equipment Installment Plan.

With our Equipment Installment Plan, you can spread out the cost of the phone over time with interest-free payments* The down payment is due upon purchase, and the remaining payments will be charged to your monthly bill. It's that easy.

Also, don't forget to ask about Premium Handset Protection® to protect your investment.

Overage alerts.

Overage Alerts can help you avoid unexpected high wireless bills. T-Mobile will now automatically notify you when you come close to exceeding your plan's WHENEVER Minutes, and again when your WHENEVER Minutes are used up. With T-Mobile Overage Alerts, you'll know when additional charges will apply, so you won't be surprised by high wireless bills again.

Overage Alerts are included in your plan but can be discontinued with a simple opt-out request.

Questions? Ask a Sales Associate about any new offers or visit www.T-Mobile.com.

T-Mobile® stick together®

***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 three months (with Even More® plan) or 19 months (with Even More Plus® plan); certain EIP offerings are 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.

All Pricing: Limited-time offers; subject to change. Taxes and fees additional. Participating locations 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. Not all features or plans available on all devices. **Unlimited features for direct U.S. communications between two people.** **General Terms:** Credit approval and \$35 per line activation fee may be required. If you switch plans you may be bound by existing contract term (and related \$200/line early cancellation fee) and \$35/line Even More Plus activation fee may apply. You may be unable to switch to some plans. Additional requirements may apply to business customers; Premier and other business/association discounts not available. Regulatory Programs Fee (not a tax or government-mandated charge) of \$1.41 per line/month applies. Taxes approx. 6%-28% of your monthly bill. Overage usage extra; partial minutes/data rounded up. Some calls/features involve multiple calls; each call incurs separate charges. **FlexPay:** Per month, per line \$4.99 Control Charge applies (unless enrolled in Easy Pay). Promotional balances are non-refundable. **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. If on FlexPay, calls rated on a per minute basis. Different terms apply to Prepaid. **Family Plans:** Limit five lines. All lines of service must be activated in the same T-Mobile market and have 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. **Messaging:** T-Mobile is not liable for content of messages/attachments or for any failures, delays or errors in any T-Mobile generated alerts or notifications. You will be charged for all messages you send and that are sent to you even if they aren't received. Length/size of messages may be limited. **Web/Data:** Overage on 4G Web-200MB plan available to post-paid customers only; FlexPay customers may not exceed 200 MB allotment. Partial megabytes rounded up for billing. **Your data session, plan, or service may be slowed, suspended, terminated, or restricted** if you use your service in a way that interferes with or impacts our network or ability to provide quality service to other users, if you roam for a significant portion of your usage, or if you use a disproportionate amount of bandwidth during a billing cycle. You may not use your plan or device for prohibited uses. **Coverage:** Service and coverage not available everywhere. **Abnormal Usage:** Service may be limited or terminated for misuse, abnormal usage 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 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 for additional information. T-Mobile and the magenta color are registered trademarks of Deutsche Telekom AG. WHENEVER Minutes, stick together, Even More, Even More Plus and Premium Handset Protection are registered trademarks of T-Mobile USA, Inc. © 2010 T-Mobile USA, Inc.

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WHENEVER Minutes	Talk	Talk + Text	Talk + Text + Web
Unlimited	\$49 ⁹⁹	\$59 ⁹⁹	\$79 ⁹⁹
1000	\$39 ⁹⁹	\$49 ⁹⁹	\$69 ⁹⁹
500	\$29 ⁹⁹	\$39 ⁹⁹	\$59 ⁹⁹

Prices reflect monthly recurring charges; taxes and fees additional. Text plans include unlimited nationwide text, IM, picture and video messaging. Web plans include unlimited nationwide Web and e-mail access.

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Pick your phone. T-Mobile/101 Piekarczyk/Page 13 of 13

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Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Map of T-Mobile Oregon Coverage

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

June 2011

T-Mobile/103
Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Interconnection Agreements

June 2011

OCN Name	Carrier Name	ST	LEGS 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 Telephone	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 Cooperative (Oregon)	Pioneer Telephone Cooperative	OR	ILEC	2393	Pioneer Telephone Cooperative		Pioneer Telephone Cooperative & 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/104
Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Rural and Non-rural Service Area List

June 2011

T-MOBILE OREGON ETC SERVICE AREA

Rural Telephone Company Study Areas	Study Area Code (SAC)	Wire Center
BEAVER CREEK COOPERATIVE TELEPHONE CO.	532359	All
CANBY TELEPHONE ASSOCIATION	532362	All
CASCADE UTILITIES, INC.	532371	All
CITIZENS TELECOMM CO OF OR DBA FRONTIER COMM	533401	All
CLEAR CREEK MUTUAL TELEPHONE CO.	532363	All
COLTON TELEPHONE CO.	532364	All
GERVAIS TELEPHONE CO.	532373	All
HELIX TELEPHONE CO.	532376	All
MALHEUR HOME TELEPHONE CO.	532456	All
MOLALLA TELEPHONE CO.	532383	All
MONITOR COOPERATIVE TELEPHONE CO.	532384	All
MONROE TELEPHONE CO.	532385	All
MT. ANGEL TELEPHONE CO.	532386	All
NEHALEM TELECOMMS, INC. DBA NEHALEM TEL & TEL	532387	All
PEOPLES TEL CO	532391	All
PIONEER TELEPHONE COOPERATIVE	532393	All
ROOME TELECOMMUNICATIONS, INC.	532375	All
SCIO MUTUAL TELEPHONE ASSOCIATION	532397	All
ST PAUL COOPERATIVE TELEPHONE ASSOCIATION	532396	All
STAYTON COOPERATIVE TELEPHONE CO.	532399	All
UNITED TELEPHONE - NORTHWEST	532400	All
Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
QWEST CORPORATION	535163	ADAROR21
		ALBYOR63
		ASLDOR55
		ASTROR64
		ATHNOR56
		BAKROR23
		BENDOR24
		BLBTOR01
		BURLOR62
		CLVROR01
		CNBHOR64
		CNPNOR29
		CRVSOR65
		CTGVOR53
		DLLSOR58
		EUGNOR28
		EUGNOR53
		FLRNOR53
		GLHLOR55
		GRPSOR29
		HMTNOR56
		INDPOR58
		JCVLOR56

T-MOBILE OREGON ETC SERVICE AREA

Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
		JFSNOR63
		JNCYOR51
		KLFLOR54
		LAPIOR52
		LEBGOR54
		LKOSOR62
		LWLLOR53
		MDFDOR33
		MDRSOR52
		MLTNOR56
		MLWKOR17
		NPLNOR62
		NWPTOR35
		ORCYOR18
		PHNXOR55
		PNTNOR56
		PRVLOR53
		PTLDOR02
		PTLDOR08
		PTLDOR11
		PTLDOR12
		PTLDOR13
		PTLDOR14
		PTLDOR17
		PTLDOR18
		PTLDOR69
		RANROR01
		RDMDOR01
		RGRVOR55
		RSBGOR57
		SALMOR58
		SALMOR59
		SESDOR64
		SPFDOR01
		SPRVOR02
		SSTROR01
		STFDOR56
		STHNOR40
		STHROR58
		UMTLOR57
		VENTOR54
		WDBNOR59
		WLWLWA01
		WNTNOR57
		WRSPOR52
		WRTNOR64
Verizon	532416	ALOHORXX

T-MOBILE OREGON ETC SERVICE AREA

Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
		AMTYORXX
		AMVLORXX
		BNKSORXX
		BVTNORXB
		CLTSORXA
		DYTNORXA
		FRGVORXX
		GDISORXX
		GRHMORXB
		GSTNORXX
		HDLTORXA
		HLBOORXB
		LAGRORXB
		MLCYORXA
		MMVLORXX
		MRPHORXX
		NWBRORXA
		ORNTORXA
		SCHLORXX
		SHWDORXA
		SLTNORXA
		SMRWORXA
		SNDYORXA
		SNSDORXX
		STFRORXX
		TGRDORXA
		TGRDORXC
		TRNRORXA
		TULTORXA
		VYVWORXA
		WIVLORXA
		YMHORXA

T-Mobile/105
Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

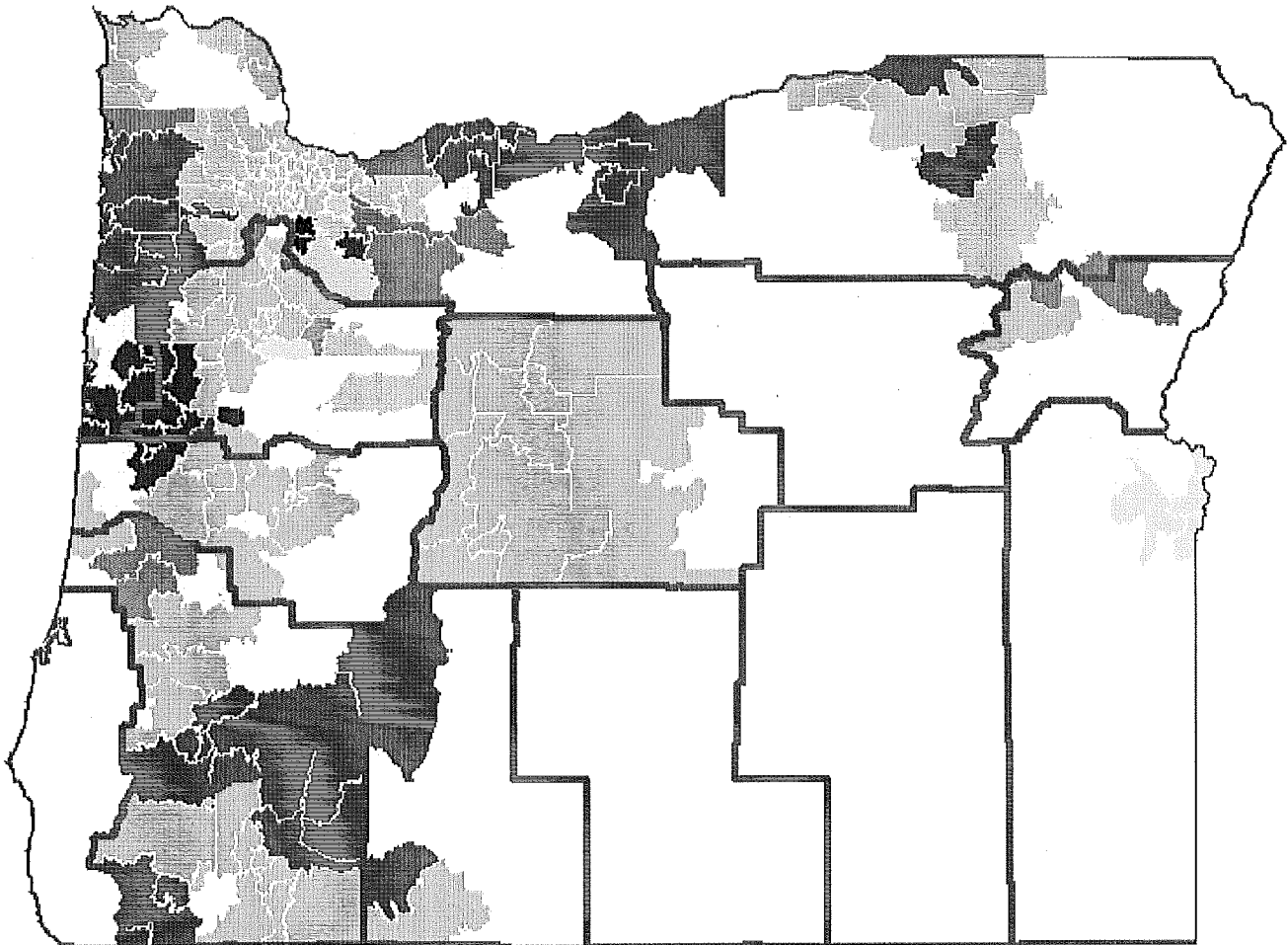
T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Map of T-Mobile ETC Service Area

June 2011



OREGON ETC SERVICE AREA



Company / Study Area

- | | |
|--|---|
| BEAVER CREEK COOPERATIVE TELEPHONE CO. | MT. ANGEL TELEPHONE CO. |
| CANBY TELEPHONE ASSOCIATION | NEHALEM TELECOMMS, INC. DBA NEHALEM TEL & TEL |
| CASCADE UTILITIES, INC. | PEOPLES TEL CO |
| CITIZENS TELECOMM CO OF OR DBA FRONTIER COMM OF OR | PIONEER TELEPHONE COOPERATIVE |
| CLEAR CREEK MUTUAL TELEPHONE CO. | ROOME TELECOMMUNICATIONS, INC. |
| COLTON TELEPHONE CO. | SCIO MUTUAL TELEPHONE ASSOCIATION |
| GERVAIS TELEPHONE CO. | ST PAUL COOPERATIVE TELEPHONE ASSOCIATION |
| HELIX TELEPHONE CO. | STAYTON COOPERATIVE TELEPHONE CO. |
| MALHEUR HOME TELEPHONE CO. | UNITED TELEPHONE - NORTHWEST |
| MOLALLA TELEPHONE CO. | QWEST CORPORATION |
| MONITOR COOPERATIVE TELEPHONE CO. | VERIZON NORTHWEST INC.-OR |
| MONROE TELEPHONE CO. | |

Licensed Area

T-Mobile/106
Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
Interstate Access Support/Interstate Common Line Support Certification

June 2011

Interstate Access Support (IAS)

January __, 2011

2010 - 2011

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

IAS

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: CC Docket No. 96-45
Interstate Access Support -- IAS
Annual Certification Filing

This is to certify that T-Mobile USA, Inc. will use its **INTERSTATE ACCESS SUPPORT – IAS** only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
T-Mobile West Corporation ¹	Oregon	

Signed,

H. Skip Cornett
Vice President, Tax
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
425-383-4000 (tel)

Carrier's Name: T-Mobile USA, Inc.

<hr/> <p>Date Received (For official use only)</p>

¹ T-Mobile West Corporation is a wholly owned subsidiary of T-Mobile USA, Inc.

Interstate Common Line Support (ICLS)

January ____, 2011

2010 - 2011

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

ICLS

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: CC Docket No. 96-45
Interstate Common Line Support -- ICLS
Annual Certification Filing

This is to certify that T-Mobile USA, Inc. will use its **INTERSTATE COMMON LINE SUPPORT – ICLS** only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
T-Mobile West Corporation ¹	Oregon	

Signed,

H. Skip Cornett
Vice President, Tax
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
425-383-4000 (tel)

Carrier's Name: T-Mobile USA, Inc.

<hr/> <p>Date Received (For official use only)</p>

¹ T-Mobile West Corporation is a wholly owned subsidiary of T-Mobile USA, Inc.

T-Mobile/107

Witness: Daniel Piekarczyk

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Daniel Piekarczyk
T-Mobile Lifeline Universal Service Notice

June 2011

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 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®



BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1511

IN THE MATTER OF T-MOBILE WEST)
CORPORATION'S APPLICATION FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER.)

T-MOBILE WEST CORPORATION

DIRECT TESTIMONY

OF

RHONDA THOMAS

June 2, 2011

1 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

2 A. My name is Rhonda Thomas. I am employed by T-Mobile USA, Inc. as a Regulatory
3 Manager for the Universal Service - Eligible Telecommunications Carrier program. My
4 business address is 12920 SE 38th Street, Bellevue, Washington 98006.

5 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

6 A. My education includes three years of general studies and directed course work at
7 Western Washington University. In my current position, I am responsible for
8 management of the day-to-day operations of T-Mobile's Universal Service – Eligible
9 Telecommunications Carrier program. Prior to my employment with T-Mobile, I worked
10 for Western Wireless, Alltel Wireless and, most recently, Verizon Wireless, for a
11 combined total of eleven years. My positions at these companies included various
12 aspects of customer service operations and regulatory matters, including approximately
13 five years experience managing compliance, reporting and other operations related to
14 universal service programs.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

16 A. The purpose of my testimony is to support T-Mobile's application for designation as an
17 Eligible Telecommunications Carrier ("ETC") for purposes of receiving federal universal
18 service support by providing information about T-Mobile's commitment to offer Lifeline
19 and T-Mobile's qualifications to be an Eligible Telecommunications Provider ("ETP") for
20 purposes of providing Oregon Telephone Assistance Program ("OTAP") services. I also
21 discuss how T-Mobile meets service quality and consumer protection requirements
22 applicable to ETCs, including continued operation in emergency situations, service
23 consistent with the CTIA Consumer Code for Wireless Service, and working with the
24 Commission to address any consumer complaints.

25

26

1 ***T-Mobile's Eligibility to Provide OTAP Services and T-Mobile's Lifeline Offering***

2 **Q. WHAT DOES OREGON REQUIRE GENERALLY WITH RESPECT TO LIFELINE AND**
3 **OTAP SERVICES?**

4 A. Oregon Requirement 7 in Order No. 06-292 requires that an ETC commit to offer and
5 advertise Lifeline, Link Up, and OTAP services.

6 **Q. HOW DOES A PROVIDER OF TELECOMMUNICATIONS SERVICE BECOME**
7 **ELIGIBLE TO OFFER OTAP SERVICES?**

8 A. Under OAR 860-033-0005(3), a provider must be certified by the Commission as an ETP
9 to be eligible to provide OTAP to qualifying customers throughout a designated service
10 area.

11 **Q. WHAT ARE THE REQUIREMENTS TO BECOME AN ETP?**

12 A. OAR 860-033-0005(3) requires that an ETP must (1) offer services under 47 C.F.R. §
13 54.101 using its own facilities or a combination of its own facilities and resale of another
14 carrier's services; (2) advertise the availability of and charges for such services using
15 media of general distribution; and (3) demonstrate that it will comply with OAR 860-033-
16 0005 through OAR 860-033-0100. Dan Piekarczyk testified to the first two requirements
17 in his testimony. I address the Company's compliance with OAR 860-033-0005 through
18 OAR 860-033-0100 and provide additional discussion of the Company's Lifeline
19 advertising.

20 **Q. DOES OREGON REQUIRE A SEPARATE APPLICATION TO BECOME AN ETP?**

21 A. Yes. Staff provided T-Mobile with the ETP application, which sets forth the conditions
22 applicable to providing OTAP services to qualifying Oregonians.

23 **Q. DOES T-MOBILE PLAN TO FILE AN ETP APPLICATION?**

24 A. Yes. T-Mobile plans to file an ETP application in this proceeding in the coming weeks.

25 **Q. DOES T-MOBILE PLAN TO OFFER A SPECIFIC LIFELINE PLAN?**

1 A. Yes. Upon designation as an ETC, consistent with Oregon Requirement 7 and 47
2 C.F.R. § 54.405, T-Mobile will make available to qualified low-income consumers a
3 discounted service offering that meets all applicable Lifeline requirements. As
4 implemented in other areas where the Company has been designated as an ETC, T-
5 Mobile's planned Lifeline service offering, which is subject to change, includes a low
6 \$6.49 per month Lifeline rate based upon a non-discounted rate of \$19.99 per month
7 (less the Lifeline discount), 145 Whenever minutes®, 500 night minutes, and 500
8 weekend minutes per month, with a per minute overage rate of \$0.05, and traditional
9 wireless calling features including call waiting, conference calling, three-way calling,
10 caller identification and voice mail.

11 **Q. WHAT LIFELINE AND OTAP DISCOUNTS WILL T-MOBILE OFFER TO QUALIFIED**
12 **LOW-INCOME CONSUMERS ON ITS LIFELINE PLAN?**

13 A. T-Mobile plans to pass through monthly discounts to consumers totaling \$13.50 in non-
14 tribal areas and \$18.99 in tribal areas for qualified consumers who select T-Mobile's
15 Lifeline Plan. These discounts are based on the following support amounts: a maximum
16 \$6.50 Tier One (Subscriber Line Charge) support, \$1.75 Tier Two (Federal Additive)
17 support, \$3.50 Carrier Provided or State Mandated support, and \$1.75 Tier Three
18 (Federal Matching) support. For eligible low-income consumers residing on federally
19 recognized tribal lands, T-Mobile will also pass through \$5.49 Tier Four
20 (Enhanced/Tribal) support. These Lifeline discounts bring the total price for qualifying
21 low-income consumers for the T-Mobile Lifeline Plan to \$6.49 per month or \$1.00 per
22 month for qualifying low-income consumers who also live on federally recognized tribal
23 lands.

24 **Q. IS THIS THE ONLY LIFELINE OFFERING THAT T-MOBILE WILL MAKE**
25 **AVAILABLE?**

26

1 A. No. While T-Mobile has historically offered only one basic Lifeline plan to its subscribers
2 in areas where it is designated as an ETC, T-Mobile understands that under OAR 860-
3 33-0010, Oregon requires ETPs to offer reduced residential rates to qualified low-income
4 consumers on all service offerings that include basic cellular service. T-Mobile commits
5 to comply with this requirement and to that end is currently working to develop the
6 system functionality to apply Lifeline discounts to all single line service plans that include
7 basic cellular service. The Company expects to have the ability to apply these discounts
8 sometime this summer.

9 **Q. WHAT LIFELINE AND OTAP DISCOUNTS WILL T-MOBILE PROVIDE TO**
10 **QUALIFYING LOW-INCOME CONSUMERS ON OTHER SINGLE LINE SERVICE**
11 **PLANS THAT INCLUDE BASIC CELLULAR SERVICE?**

12 A. T-Mobile plans to pass through monthly discounts to consumers totaling \$13.50 in non-
13 tribal areas and up to a maximum of \$38.50 in tribal areas for qualified consumers who
14 select one of T-Mobile's other single line service plans that includes basic cellular
15 service. These discounts are based on the following support amounts: a maximum
16 \$6.50 Tier One (Subscriber Line Charge) support, \$1.75 Tier Two (Federal Additive)
17 support, \$3.50 Carrier Provided or State Mandated support, and \$1.75 Tier Three
18 (Federal Matching) support. For eligible low-income consumers residing on federally
19 recognized tribal lands, T-Mobile will also pass through up to \$25.00 Tier Four
20 (Enhanced/Tribal) support, to the extent that the discounts do not reduce the charge to
21 consumers below \$1.00 per month.

22 **Q. DOES T-MOBILE PLAN TO OFFER LIFELINE AND OTAP DISCOUNTS ON MULTI-**
23 **LINE PLANS?**

24 A. OAR 860-033-0010 requires that the discount "apply to the single line, or service that is
25 functionally equivalent to a single line, serving the eligible recipient's principal
26 residence." In the context of wireless service, where some customers have family plans

1 sharing minutes of use, T-Mobile believes that OAR 860-033-0010 would not apply to
2 multi-line accounts, such as family plans, because they would not be "functionally
3 equivalent to a single line, serving the eligible recipient's principal residence."

4 **Q. CAN T-MOBILE APPLY A LIFELINE DISCOUNT ON MULTI-LINE PLANS WHILE**
5 **COMPLYING WITH ALL FCC RULES?**

6 A. No, I do not believe so. If T-Mobile is designated an ETC in Oregon, it will need to
7 maintain compliance with not only OTAP rules, but also federal rules (generally set forth
8 in 47 C.F.R. §54, Subpart E). In particular, under federal law, T-Mobile is required to
9 waive the federal Universal Service Fund ("FUSF") and local number portability fees and
10 apply Lifeline discounts to basic service for the qualified subscriber. To ensure that
11 Lifeline subscriber accounting and reporting requirements are handled consistent with
12 FCC rules, T-Mobile requires that Lifeline subscriber accounts be differentiated from
13 other accounts. These requirements are difficult, if not impossible, to apply to multi-line
14 accounts.

15 **Q. CAN YOU EXPLAIN WHY YOU BELIEVE T-MOBILE CANNOT PROVIDE LIFELINE**
16 **DISCOUNTS ON MULTI-LINE ACCOUNTS WHILE REMAINING COMPLIANT WITH**
17 **FEDERAL RULES?**

18 A. Certainly. Multi-line accounts, including those on family plans and other plans that share
19 minutes, pose a unique difficulty to T-Mobile with regard to the federal requirement to
20 apply Lifeline discounts to basic service for the qualified low-income subscriber.
21 Specifically, T-Mobile offers plans that include services for two lines of service at a
22 singular rate and additional lines at a reduced "partner" rate that can share the benefits
23 of the plan selected for the first two lines. In this situation, it is difficult, if not impossible,
24 to differentiate the charges for lines 1 and 2 of the shared plan to ensure that the
25 discount is applied only to the qualified low-income subscriber.

1 **Q. WOULD PROVIDING LIFELINE DISCOUNTS ON MULTI-LINE PLANS CAUSE ANY**
2 **OTHER PROBLEMS?**

3 A. Yes. T-Mobile takes its responsibilities to all customers, including those that qualify for
4 Lifeline, very seriously. Thus, in order to provide the best possible customer service to
5 our Lifeline customers, T-Mobile has established practices and internal requirements
6 that enable it to properly route Lifeline subscriber questions, concerns and issues, as
7 well as to ensure that any and all accounting and reporting requirements are met. This
8 customer routing is dependent upon a particular customer account type and sub type
9 combination. If applied to a multi-line account, all lines of service on a Lifeline account
10 would be handled as such, potentially causing customer service, accounting, and
11 reporting problems.

12 **Q. WILL T-MOBILE OFFER LINK UP DISCOUNTS TO QUALIFYING LOW-INCOME**
13 **CONSUMERS?**

14 A. Yes. T-Mobile will offer Link Up discounts to low-income consumers who are qualified
15 by OTAP, or for consumers who reside on federally recognized tribal areas that are
16 qualified by T-Mobile, prior to activating service with T-Mobile.

17 **Q. WHAT LINK UP DISCOUNTS WILL T-MOBILE OFFER TO QUALIFYING LOW-**
18 **INCOME CONSUMERS?**

19 A. T-Mobile will pass through a discount of 50% off its customary connectivity or activation
20 fee of \$35.00, for a total discount of \$17.50 for any qualifying low-income consumer.
21 Because T-Mobile does not charge a different activation fee for customers residing on
22 federally recognized tribal lands, T-Mobile will offer the same discount to all qualifying
23 low-income consumers.

24 **Q. ARE THESE DISCOUNTS CONSISTENT WITH FEDERAL AND OREGON RULES?**

25 A. Yes. The discounts described above are consistent with 47 C.F.R. § 54.405 and OAR
26 860-033-0035.

1 **Q. WILL T-MOBILE SEEK REIMBURSEMENT FROM THE FEDERAL UNIVERSAL**
2 **SERVICE FUND FOR THE LIFELINE DISCOUNTS IT OFFERS?**

3 A. Yes. T-Mobile will seek reimbursement from the FUSF of the Lifeline discounts it passes
4 through to consumers to the extent allowed. That is, the Company will seek
5 reimbursements based on the following amounts: a maximum \$6.50 Tier One
6 (Subscriber Line Charge) support, \$1.75 Tier Two (Federal Additive) support, and \$1.75
7 Tier Three (Federal Matching) support. For eligible low-income consumers residing on
8 federally recognized tribal lands, T-Mobile will also seek reimbursement for any
9 additional Tier Four (Enhanced/Tribal) support it passes through to consumers.

10 **Q. WILL T-MOBILE SEEK REIMBURSEMENT FROM THE FUSF FOR THE LINK UP**
11 **DISCOUNTS IT OFFERS?**

12 A. Yes. T-Mobile will seek reimbursement of the Link Up discounts it passes through to
13 consumers from the FUSF to the extent allowed. Specifically, T-Mobile will seek
14 reimbursement from the FUSF for the \$17.50 Link Up discount that it passes through to
15 qualifying low-income consumers.

16 **Q. WILL T-MOBILE SEEK REIMBURSEMENT FROM THE FUSF FOR ANY**
17 **INCREMENTAL COSTS OF PROVIDING TOLL LIMITATION SUPPORT FOR**
18 **QUALIFYING LOW-INCOME CONSUMERS?**

19 A. No. T-Mobile will not seek reimbursement from the FUSF for the cost of providing toll
20 limitation support for qualifying low-income consumers.

21 **Q. WILL T-MOBILE SEEK REIMBURSEMENT FROM OTAP FOR THE \$3.50 CARRIER**
22 **PROVIDED OR STATE MANDATED SUPPORT?**

23 A. No. T-Mobile will provide the \$3.50 discount to eligible customers consistent with FCC
24 rules and OTAP requirements but will not seek reimbursement from OTAP.

25 **Q. IS T-MOBILE SEEKING REIMBURSEMENT FROM OTAP FOR THE COST OF**
26 **ENROLLING NEW OTAP CUSTOMERS?**

1 A. No.

2 **Q. IS T-MOBILE'S DECISION TO NOT SEEK REIMBURSEMENT FOR THESE**
3 **AMOUNTS CONSISTENT WITH THE OTAP RULES?**

4 A. Yes. While OAR 860-033-0045 allows an ETP to be compensated from the Residential
5 Service Protection Fund for enrolling new OTAP customers and passing through the
6 state mandated support of \$3.50, the rules do not require an ETP to do so.

7 **Q. WHY IS T-MOBILE CHOOSING TO FOREGO REIMBURSEMENT OF THE STATE**
8 **MANDATED AND ENROLLMENT SUPPORT FUNDED BY OTAP?**

9 A. T-Mobile received its first ETC designation by acquiring an entity that was designated as
10 an ETC and had pending designations in other states that were thereafter granted. As a
11 result, T-Mobile made a determination that it could commit to certain obligations to
12 comply with the requirements of being designated as an ETC and would launch a
13 program designed to meet the needs of such a program. In the course of establishing its
14 ETC program, T-Mobile made a determination that it would not proactively seek any
15 state support, either high cost or low-income support, that might be available in any of
16 the states for many reasons, primarily administrative ease.

17 **Q. WILL T-MOBILE COMPLY WITH ALL RELEVANT OTAP RULES EVEN IF IT IS NOT**
18 **SEEKING REIMBURSEMENT FOR STATE FUNDS?**

19 A. Yes. As T-Mobile will certify in its ETP application, T-Mobile agrees to comply with all
20 applicable laws and rules applicable to providing OTAP service.

21 **Q. WHAT PROCESS WILL T-MOBILE FOLLOW TO ENSURE THAT ONLY ELIGIBLE**
22 **LOW-INCOME CONSUMERS RECEIVE LIFELINE SERVICE?**

23 A. Consistent with OTAP requirements, T-Mobile will make available discounted service
24 offerings to consumers that OTAP has identified as eligible to receive Lifeline service
25 under OAR 860-033-0030. Consumers who believe they may qualify for Lifeline service
26 and also reside on federally recognized tribal lands will be asked to apply directly to T-

1 Mobile for Lifeline benefits, and T-Mobile will review the required documentation and
2 qualify consumers as appropriate to receive Lifeline benefits.

3 **Q. WHAT PROCESS WILL T-MOBILE FOLLOW TO REPORT AND RECEIVE SUPPORT**
4 **FOR ONLY QUALIFIED LOW-INCOME CONSUMERS?**

5 A. As employed in other states in which it is designated as an ETC, T-Mobile will utilize
6 processes to ensure that it complies with all applicable rules and reporting requirements.
7 Specifically, T-Mobile will ensure that only those consumers who have been qualified by
8 OTAP to receive Lifeline and/or Link Up benefits are reported for purposes of T-Mobile
9 seeking support from the FUSF, with the exception that any consumers who also reside
10 on tribal lands and self-certify to T-Mobile will be reported after having been qualified by
11 T-Mobile directly.

12 **Q. DOES T-MOBILE PLAN TO ADVERTISE THE AVAILABILITY OF ITS LIFELINE AND**
13 **LINK-UP SERVICES?**

14 A. Yes. T-Mobile, in its Application, addressed Oregon Requirement 7.1, which requires a
15 description of advertising plans designed to reach the target low-income population. T-
16 Mobile will distribute literature describing its Lifeline and Link Up services to locations
17 where those likely to be eligible for the program(s) would encounter the information,
18 such as hospitals, clinics, hospices, senior centers, welfare offices, and other locations.
19 Attached as Exhibit T-Mobile/201 is an example of T-Mobile's Lifeline advertisements.

20 **Q. WHAT BENEFITS WILL THE COMPANY'S LIFELINE OFFERINGS PROVIDE OVER**
21 **EXISTING LIFELINE OFFERINGS?**

22 A. T-Mobile's Lifeline offerings have many benefits for Oregon consumers. First, T-Mobile
23 understands from Staff that there are areas in which a wireless Lifeline offering is not
24 currently available. In particular, of the twenty-one rural incumbent local exchange

1 carrier ("RLEC") study areas included in T-Mobile's Application, five¹ currently do not
2 have a wireless competitor designated as an ETC throughout the study area, which
3 means that there is no wireless Lifeline alternative available to consumers. In thirteen
4 other RLEC study areas, only one wireless carrier is designated as an ETC and
5 (presumably) offering Lifeline, which limits choice for consumers. Attached as Exhibit T-
6 Mobile/202 is a list of rural study areas in Oregon showing the wireless carriers certified
7 as ETCs in each area. Thus if T-Mobile is certified as an ETC, rural Oregonians
8 qualifying for Lifeline will have significantly greater competitive alternatives for Lifeline
9 Service.

10 Second, T-Mobile will be expanding its coverage through the use of high cost
11 federal universal service funds, which will enable consumers to obtain T-Mobile's service
12 offerings in new coverage areas. Qualifying low-income consumers in those areas will
13 receive the benefit of T-Mobile's Lifeline offerings where they did not previously.

14 Third, in comparison to the wireless Lifeline plans offered by the three active
15 ETC wireless carriers, available to consumers in Oregon, T-Mobile's Lifeline Plan is
16 competitive, offering consumers a total of 1,145 minutes for a discounted monthly rate of
17 \$6.49 for qualifying non-tribal consumers and a discounted monthly rate of \$1.00 for
18 qualifying consumers who are also residents of federally-recognized tribal lands. T-
19 Mobile also offers the lowest rate for overage minutes in its Lifeline Plan, compared to
20 the following Oregon wireless ETCs' comparable postpaid Lifeline plans— AT&T, Eagle
21 Telephone System d/b/a Snake River PCS and U.S. Cellular. T-Mobile's Lifeline Plan
22 charges \$0.05 per overage minute. AT&T offers a per minute overage rate of \$0.15; ,
23 Eagle Telephone System d/b/a Snake River PCS offers a per minute local calling

¹ Source 3Q2011 USAC Appendix HC03 – Rural Study Areas with Competition (available at <http://www.usac.org/about/governance/fcc-filings/2011/Q3/HC03%20-%20Rural%20Study%20Areas%20with%20Competition%20-%203Q2011.xls>)

1 overage rate of \$0.20 per minute plus a per minute long distance overage rate of \$0.10,
2 and U.S. Cellular offers a per minute overage rate of \$0.49 . Additionally, T-Mobile's
3 general individual service offerings that include basic cellular service are competitive
4 and offer great value to consumers, so any additional discounting offered to low-income
5 consumers who qualify for Lifeline will make those offerings even more attractive to
6 consumers. Copies of our competitors' information about their offerings taken from the
7 internet are attached as Exhibit T-Mobile/203

8 Fourth, if T-Mobile is granted ETC status, the Company will offer Lifeline and Link
9 Up benefits not only in those areas where it obtains ETC status, but in any part of
10 Oregon reached by its network, benefiting low-income consumers who choose T-Mobile
11 service throughout its network coverage area in Oregon.

12
13 ***Service Quality and Consumer Protection Requirements***

14 **Q. PLEASE DESCRIBE T-MOBILE'S COMPLIANCE WITH APPLICABLE SERVICE**
15 **QUALITY AND CONSUMER PROTECTION REQUIREMENTS.**

16 A. T-Mobile is a signatory to the CTIA Consumer Code for Wireless Service, which is the
17 applicable service quality and consumer protection standard for wireless carriers, as
18 provided for in Oregon Requirement 9 and 47 C.F.R. § 54.202(a)(3). Attached as
19 Exhibit T-Mobile/204 is a copy of the June 22, 2010 letter from CTIA to T-Mobile
20 confirming T-Mobile's certification. T-Mobile also provides its customers with other
21 service quality and consumer protection benefits that have resulted in the Company
22 being recognized as one of the best in wireless customer service.

23 On February 3, 2011, T-Mobile was awarded the highest ranking for the second
24 consecutive time in J.D. Power and Associates' 2011 Wireless Customer Care
25 Performance StudySM- Volume 1. The study measures customer satisfaction with the
26 service they received using the automated response system, and combined with live

1 customer service representative assistance, as well as in retail stores and online.
2 Attached as Exhibit T-Mobile/205 are copies of J.D. Power Press Releases.

3 On February 17, 2011, T-Mobile was again recognized for excellence in
4 customer satisfaction with its fourth consecutive highest ranking in J.D. Power and
5 Associates' 2011 Wireless Retail Sales Satisfaction StudySM- Volume 1. For T-Mobile,
6 this was the ninth top ranking from J.D. Power and Associates in the Wireless Retail
7 Satisfaction Study's past 12 volumes, dating back to 2004. In this most recent study,
8 T-Mobile ranked not only highest overall, but in each area for which the study measured
9 customer satisfaction.

10 **Q. HAS T-MOBILE COMMITTED TO RESOLVE COMPLAINTS RECEIVED BY THE**
11 **COMMISSION?**

12 A. Yes. Consistent with Oregon Rule 9.2, T-Mobile also commits to resolve complaints
13 received by the Commission and has designated the following contact person to work
14 with the Commission's Consumer Services Division for complaint resolution: Teri Y.
15 Ohta, T-Mobile USA, Inc. 12920 SE 38th Street Bellevue, WA 98006.

16
17 ***Ability to Remain Functional in Emergency Situations***

18 **Q. IS T-MOBILE ABLE TO REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS?**

19 A. Yes, consistent with Oregon Requirement 8 and 47 C.F.R. § 54.201(a)(2), T-Mobile is
20 able to remain functional in an emergency situation by employing back-up power to
21 ensure a functioning network and network redundancy for re-routing traffic. Specifically,
22 T-Mobile has fixed and portable back-up power generators located at various network
23 locations that it can deploy in emergency situations. The majority of sites not equipped
24 with fixed generators have battery back-up systems installed to maintain service in the
25 event of a widespread power outage. T-Mobile also has the ability to reroute traffic
26 around damaged out-of-service facilities through the deployment of cell-on-wheels

1 ("COWS"), redundant facilities, and dynamic rerouting of traffic over alternate facilities.

2 In addition, T-Mobile has a network control center that monitors network traffic and
3 anticipates traffic spikes and can (i) deploy network facilities to accommodate capacity
4 needs; (ii) change call routing translations; and (iii) deploy COWS to temporarily meet
5 traffic needs until more durable solutions, such as additional capacity and antenna
6 towers, can be deployed. T-Mobile also maintains an extensive Business Continuity
7 Program that consists of a number of professionals responsible for documenting and
8 developing enterprise standards, processes, and policies for all business continuity
9 planning and defines enterprise tools and methodologies. T-Mobile's Business
10 Continuity Business Program Summary is attached as confidential Exhibit T-Mobile/206.

11 **Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

12 A. Yes. T-Mobile's application meets all requirements for the provision of Lifeline services,
13 and demonstrates that the Company is qualified to be an ETP for purposes of providing
14 OTAP services. In addition, T-Mobile meets service quality and consumer protection
15 requirements applicable to ETCs, including continued operation in emergency situations,
16 service consistent with the CTIA Consumer Code for Wireless Service, and working with
17 the Commission to address any consumer complaints.

18 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

19 A. Yes.

20

21

22

T-Mobile/201
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
T-Mobile Washington Lifeline Notice Brochure

June 2011

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.



T-Mobile/202
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
Rural Study Areas with Competition

June 2011

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
Rural Study Areas with Competition
Third Quarter 2011

STATE	ILEC SAC	ILEC Study Area Name	GETC SAC	GETC Study Area Name	ETC
OR	532359	BEAVER CREEK COOP	539006	CINGULAR WIRELESS (OR)	Y
OR	532361	CENTURYTEL-OREGON	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532361	CENTURYTEL-OREGON	539004	EDGE WIRELESS	Y
OR	532361	CENTURYTEL-OREGON	539007	EAGLE TELEPHONE SYSTEMS, INC. DBA SNAKE RIVER PCS	Y
OR	532362	CANBY TEL ASSN	539006	CINGULAR WIRELESS (OR)	Y
OR	532363	CLEAR CREEK MUTUAL	539006	CINGULAR WIRELESS (OR)	Y
OR	532369	EAGLE TEL SYSTEMS	539007	EAGLE TELEPHONE SYSTEMS, INC. DBA SNAKE RIVER PCS	Y
OR	532371	CASCADE UTIL INC	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532371	CASCADE UTIL INC	539004	EDGE WIRELESS	Y
OR	532371	CASCADE UTIL INC	539007	EAGLE TELEPHONE SYSTEMS, INC. DBA SNAKE RIVER PCS	Y
OR	532373	GERVAIS TELEPHONE CO	539006	CINGULAR WIRELESS (OR)	Y
OR	532375	ROOME TELECOMM INC	539006	CINGULAR WIRELESS (OR)	Y
OR	532376	HELIX TEL CO.	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532377	HOME TELEPHONE CO	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532377	HOME TELEPHONE CO	539006	CINGULAR WIRELESS (OR)	Y
OR	532378	TRANS-CASCADES TEL	539006	CINGULAR WIRELESS (OR)	Y
OR	532386	MT. ANGEL TEL CO.	539006	CINGULAR WIRELESS (OR)	Y
OR	532387	NEHALEM TELECOMM.	539006	CINGULAR WIRELESS (OR)	Y
OR	532388	NORTH STATE TEL CO.	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532388	NORTH STATE TEL CO.	539006	CINGULAR WIRELESS (OR)	Y
OR	532389	OREGON TEL CORP	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532391	PEOPLES TEL CO. - OR	539006	CINGULAR WIRELESS (OR)	Y
OR	532392	PINE TEL SYSTEM INC.	539007	EAGLE TELEPHONE SYSTEMS, INC. DBA SNAKE RIVER PCS	Y
OR	532393	PIONEER TEL COOP	539006	CINGULAR WIRELESS (OR)	Y
OR	532396	ST PAUL COOP ASSN	539006	CINGULAR WIRELESS (OR)	Y
OR	532399	STAYTON COOP TEL CO	539006	CINGULAR WIRELESS (OR)	Y
OR	532400	UTC OF THE NW - OR	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	532400	UTC OF THE NW - OR	539004	EDGE WIRELESS	Y
OR	532456	MALHEUR HOME TEL CO	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	533401	CITIZENS-FRONTIER-OR	539002	UNITED STATES CELLULAR CORPORATION	Y
OR	533401	CITIZENS-FRONTIER-OR	539004	EDGE WIRELESS	Y

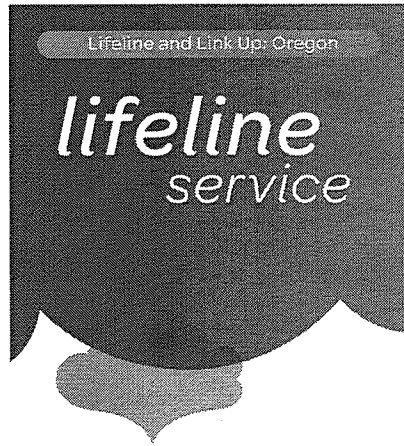
T-Mobile/203
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
Competitors' Offerings

June 2011



Discounted service
for qualified customers

Lifeline

Offers you a discount on your monthly wireless bill, if you qualify.

Save Money With Lifeline

Right now, you can save \$13.50 each month with Lifeline discounting.

Qualifying for Lifeline

The Oregon Telephone Assistance Program (OTAP) can help you with your phone bill. If you receive one of the following qualifying benefits, you can receive the current reduction of up to \$13.50 off your phone bill.

- Food Stamps
- Temporary Aid to Needy Families (TANF)
- Supplemental Security Income (SSI)
- Certain Medical or Medicare Programs

Contact the Public Utility Commission (PUC) Monday through Friday from 8:00 a.m. to 5:00 p.m. at the following telephone numbers or email address:

1-800-848-4442
1-800-648-3458 (TTY)
503-373-7171 (Salem Area)
www.rsp.org

Program Restrictions

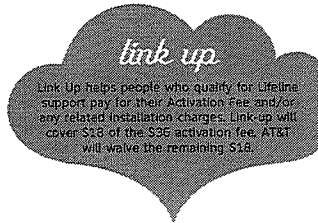
You are eligible for Lifeline support on one phone line based at your principal residence and billed to your name. You can get Link Up benefits only once at the same address. Those benefits can only be applied toward your Activation Fee, never toward your purchase of equipment.

Signing Up

Complete the Oregon Telephone Assistance Program (OTAP) form. Call 1-800-848-4442 for an application. Mail or fax the completed application to:

Public Utility Commission
Oregon Telephone Assistance Program
PO Box 2148
Salem, OR 97308
Fax: 1-877-567-1977 or 503-378-6047

You can also complete an application online at <http://www.rsp.org>.

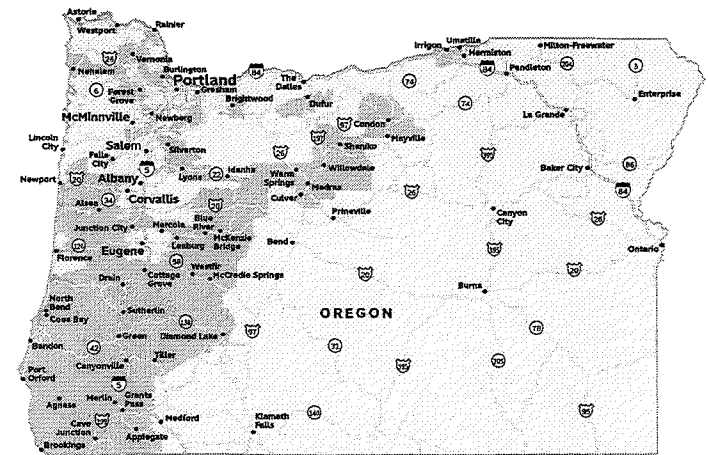


If you still have questions or would like to receive information by mail, please call a Lifeline Customer Service Representative at 1-800-377-9450, Monday through Friday between the hours of 10:00 a.m. and 7:00 p.m. CST.

Terms and Conditions: Lifeline and Link Up Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline and Link Up Contract. Service provided by AT&T Mobility. © 2011 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations. To determine if Lifeline and Link Up are available from AT&T Mobility at your principal residence, please contact our Lifeline Customer Service Representative at 1-800-377-9450. Revised 01/2011.

Lifeline service for only \$24⁹⁹ per month 300 Anytime Minutes / 1000 Night & Weekend Minutes* and Nationwide Long Distance Included

*\$13.50 Lifeline discount applies in non-tribal areas; additional discounts apply in tribal areas. To qualify for Lifeline, you must reside in the shaded area.



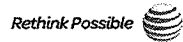
Eligibility based on residing in shaded area

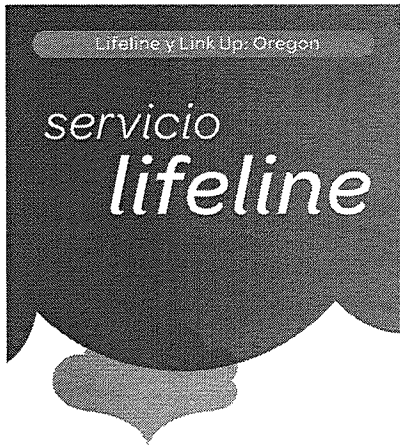
If you still have questions or would like to receive information by mail, please call a Lifeline Customer Service Representative at 1-800-377-9450, Monday through Friday between the hours of 10:00 a.m. and 7:00 p.m. CST.

Your phone's display does not indicate the rate you will be charged. Customer Home calling area consists of all states of Oregon, Washington and Idaho. Coverage may be affected by such things as terrain, weather, obstructions and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber. Future coverage, if projected above, is based on current planning assumptions but is subject to change and has not yet been confirmed.

The night and weekend periods are from 9:00 p.m. to 5:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The anytime minutes used in long distance calls to the United States will be discounted from the plan. Originating international long distance calls will not be allowed. The roaming cost is \$0.25 per minute and anytime minutes used will be deducted from minutes included in the plan. International roaming is not available. No rollover can be made. The anytime minutes used in excess of the ones included in the plan will be charged at \$0.15 per minute. These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations. To determine if Lifeline and Link Up are available from AT&T Mobility at your principal residence, please contact our Lifeline Customer Service Representative at 1-800-377-9450.

Terms and Conditions: Lifeline and Link Up Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline and Link Up Contract. © 2011 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. Revised 01/2011.





Servicio con descuento para clientes
que reúnan los requisitos

Lifeline

Ofrece un descuento en la factura mensual de telefonía móvil, para quienes cumplen con los requisitos.

Ahorra dinero con Lifeline

Ahora mismo puedes ahorrar \$13.50 por mes con el descuento de Lifeline.

Requisitos para Lifeline

El Programa de asistencia telefónica de Oregon (OTAP, por su sigla en inglés) puede ayudarte con la factura telefónica. Cumples con los requisitos para recibir un descuento de hasta \$13.50 en la factura telefónica si recibes uno de los siguientes beneficios.

- Cupones para alimentos (Food Stamps)
- Asistencia temporal a familias necesitadas (Temporary Aid to Needy Families o TANF, par su sigla en inglés)
- Ingresos complementarios de seguridad (Supplemental Security Income o SSI, por su sigla en inglés)
- Determinados programas médicos a Medicare

Comunícate con la Comisión de Empresas de Servicio Público (PUC) de lunes a viernes de 8:00 a.m. a 5:00 p.m. con los siguientes números de teléfono o direcciones de correo electrónico:

1-800-848-4442
1-800-648-3458 (teletipo)
503-373-7171 (zona de Salem)
www.rspf.org

Restricciones del programa

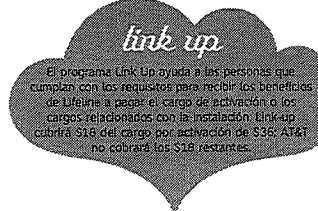
Sólo puedes recibir la asistencia de Lifeline en una sola línea de teléfono, con base en tu residencia principal, facturada a tu nombre. Podrás recibir los beneficios de Link Up solamente una vez en la misma dirección. Esos beneficios se podrán aplicar solamente en el cargo de activación, nunca en la compra del equipo.

Para inscribirte

Llena el formulario del Programa de asistencia telefónica de Oregon (OTAP). Llama al 1-800-848-4442 para pedir una solicitud. Llénala y envíala por correo o fax a:

Public Utilities Commission
Oregon Telephone Assistance Program Administrators
PO Box 2148
Salem, OR 97308
o envíalo por fax a: 1-877-567-1977
o 503-378-6047

También puedes completar una solicitud por Internet en <http://www.rspf.org>.



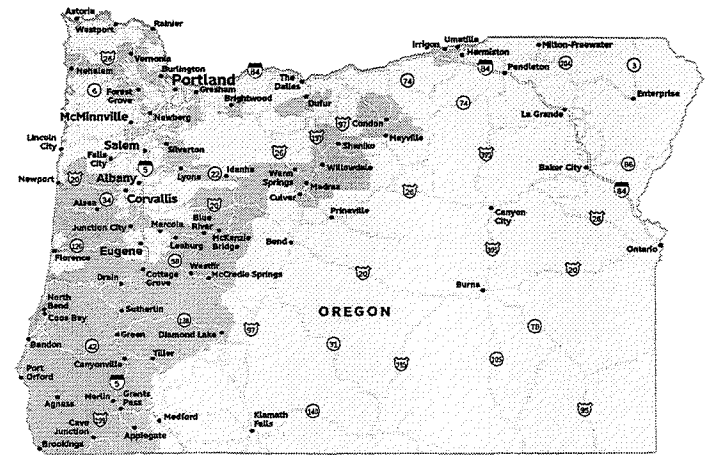
En caso de tener preguntas o si deseas recibir información por correo, comunícate con un representante del servicio al cliente de Lifeline al 1-800-377-9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

Términos y condiciones: el servicio de Lifeline y Link Up está sujeto a los términos y condiciones que aparecen en los Términos de servicio, el Plan de tarifas, la información de venta y en el Contrato de Lifeline y Link Up. Servicio ofrecido por AT&T Mobility. © 2011 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todas las otras marcas comerciales aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Estos programas gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos requisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece los servicios de Lifeline y Link Up en el lugar de residencia principal del suscriptor, favor de comunicarse con un representante del servicio al cliente de Lifeline al 1-800-377-9450. Actualizado Enero de 2011.

Servicio Lifeline a sólo \$24⁹⁹ por mes

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana¹, y larga distancia a nivel nacional

¹El descuento de \$13.50 de Lifeline se aplica en áreas no tribales; los descuentos adicionales se aplican en áreas tribales. Para poder participar en el programa Lifeline, debes vivir en el área sombreada.



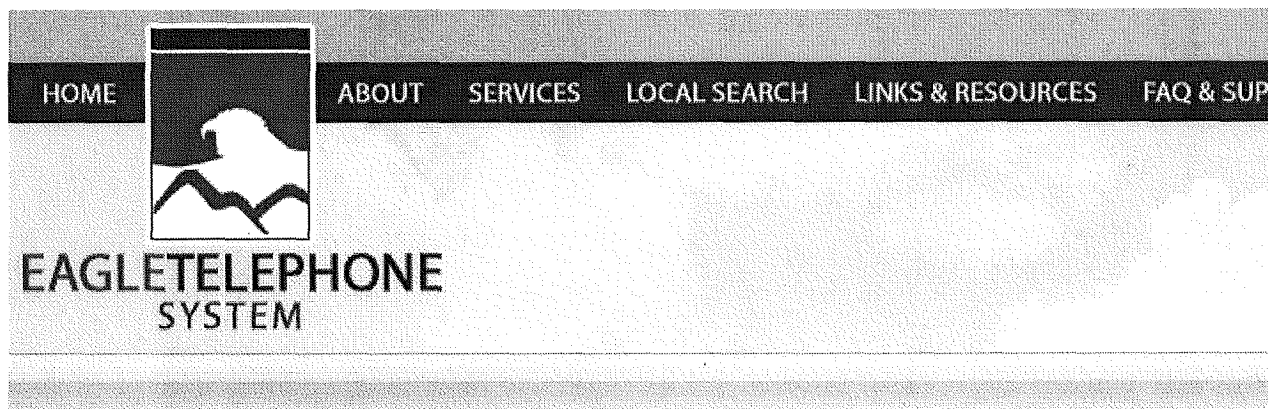
La participación depende de vivir en el área sombreada del mapa

En caso de tener preguntas o si deseas recibir información por correo, comunícate con un representante del servicio al cliente de Lifeline al 1-800-377-9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

La información que aparece en la pantalla del teléfono está sujeta a cambios sin previo aviso. El área de cobertura real puede variar por razones del tiempo, clima, trabajo, edificios y demás circunstancias. AT&T no garantiza la cobertura. Los cargos aparecen en el lugar donde se transmite y recibe la llamada, más no del lugar en el que se encuentra el suscriptor. La cobertura futura, en caso de representación analítica, se basa en suposiciones actuales de planificación, aunque se encuentra sujeta a cambios y aún no se ha confirmado.

¹Los períodos de noche y de fin de semana son de 9:00 p.m. a 6:00 a.m. de lunes a viernes, y todo el día los sábados y domingos. Los minutos de uso utilizamos en las llamadas de larga distancia a los Estados Unidos se descuentan del plan. No está permitido cambiar llamadas de larga distancia internacional. El costo de roaming es de \$0.25 por minuto y los minutos de uso se descuentan de los minutos incluidos en el plan. No se ofrece servicio de roaming internacional. No se pueden transferir los minutos de mes a mes. Los minutos de uso que exceden la cantidad asignada en el plan se cobran a \$0.25 por minuto. Estos programas gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos requisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece los servicios de Lifeline y Link Up en el lugar de residencia principal del suscriptor, favor de comunicarse con un representante del servicio al cliente de Lifeline al 1-800-377-9450.

Términos y condiciones: el servicio de Lifeline y Link Up está sujeto a los términos y condiciones que aparecen en los Términos de servicio, el Plan de tarifas, la información de venta y en el Contrato de Lifeline y Link Up. © 2011 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todas las otras marcas comerciales aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Actualizado Enero de 2011.



Services

Snake River PCS Wireless Service

Basic Cellular Service Available From Snake River PCS

Snake River PCS is your local wireless service provider. We can provide our customers reliable, quality cellular service with our basic mobile mini plan at a price comparable to that of our local basic wire-line service.

Our Basic mini-plan includes:

- Single Party Residential Wireless Line - \$22.50
- Single Party Business Wireless Line - \$22.50
- Residential Service Protection Fund - \$0.09
- Emergency 911 Services - \$0.75
- 200 Daytime Local Minutes - no charge
- 40 Travel Minutes - no charge
- Unlimited Nationwide Long-Distance - no charge
- Voicemail - no charge
- Unlimited Incoming Text Messaging - no charge
- Unlimited Local Area Mobile-to-Mobile calls - no charge
(*with all other Snake River PCS Customers)

This basic mini-plan service is available for \$23.34 per month including taxes.

Low-income households may apply for financial assistance through our Lifeline and Link-Up America telephone assistance programs, which provide discounts of up to \$13.50 off our basic service rate.

If you have questions regarding our plans or assistance programs, please contact us at 541-893-6115 or visit our business of information about the Oregon Telephone Assistance Program, visit www.lifeline.gov.

All Plans Include:

- Nationwide Long Distance
- Unlimited nights and weekends in home area (9:00p.m. to 6:59a.m. daily) and (9:00pm Friday to 6:59am Monday)
- Voicemail
- Caller ID
- Unlimited Incoming Text Messages
- Home Area Mobile to Mobile for all SRPCS Customers
- There is a \$25.00 activation fee added to all new connects

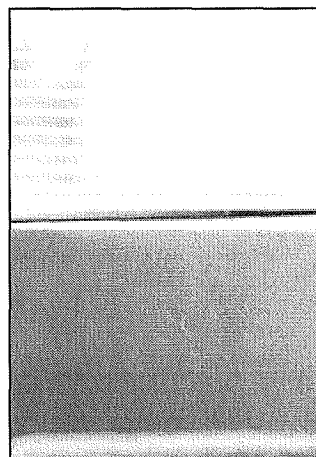
Add Ons Available:

- 1000 Day time minutes \$10

Snake

WIRELESS SERV

Richland, OR



- 2000 Day time minutes \$20
- 3000 Day time minutes \$30
- 500 Travel Minutes \$10
- 1000 Travel Minutes \$20
- Unlimited out going text for \$8.95
- Add another line for \$9.95
- Add Data \$18.95
- Buy earlier nighttime minutes to start at 8p.m. \$10
- Buy earlier nighttime minutes to start at 7p.m. \$20
- Home area OVERAGE CHARGES \$0.20 per minute air time and \$0.10 per minute long distance
- Travel minute OVERAGE CHARGES \$0.35 per minute air time and \$0.15 per minute long distance

MINI PERSONAL PLAN

- 200 local home minutes
- 40 travel minutes
- \$22.50 + taxes

PERSONAL PLAN

- 1000 local home minutes
- 200 travel minutes
- \$39.95 + taxes

BUSINESS I

- 3000
- 1500
- \$99.95

Home | [About Us](#) | [Services](#) | [Local Search](#) | [Links & Resources](#) | [Frequently Asked Questions](#) | [Contact Us](#)
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Plans

LIFELINE

- Other Plans Home

Lifeline Calling Plans

The Lifeline Calling Plans/Lifeline discounts are available to residents in states where U.S. Cellular® is an eligible telecommunications carrier. To purchase the Lifeline Calling Plan or receive Lifeline discounts, you must participate in one of the eligible programs and reside within U.S. Cellular's ETC coverage area based on the zip code of your home address.

Lifeline subsidies may only be applied once per household on either your landline or your wireless service. Eligibility to receive Lifeline discounts will be verified annually. Not all Lifeline calling plans are available in all markets where U.S. Cellular is an eligible telecommunications carrier. Call 1-800-447-1339 for more details about U.S. Cellular's Lifeline calling plans and to place an order.

Essential Lifeline Calling Plans

Monthly Rate	\$29.99	\$39.99
Anytime Minutes	300	700
Wide Area Unlimited Incoming Calls	\$6.00	Included
Wide Area Night & Weekend Minutes (Starting at 9:00 p.m.)	\$6.00	\$6.00
Additional Minutes	49¢ per minute	49¢ per minute

Included Features:

Voice Mail, Call Waiting, Caller ID, Call Forwarding, Three-Way Calling and Incoming Text Messages

Lifeline Tribal Lands/Oklahoma Calling Plan

Monthly Rate	\$20.00
Anytime Minutes	Unlimited
Roaming	Not Available
Long Distance	Not Available

Included Features:

Voice Mail, Call Waiting, Caller ID, Call Forwarding, Three-Way Calling and Incoming Text Messages

Lifeline Tribal Lands Prepaid Calling Plans

One Time Payment for 12 Months	\$36.00
Anytime Minutes	700

U.S. Cellular website

<http://www.uscellular.com/plans/lifeline/index.html>

Unlimited Incoming calls	Included
Additional Minutes	49¢ per minute
Roaming	69¢ per minute
Text Messaging	250 Messages for \$4.95 per month or 20¢/message
Picture & Video Messaging	Unlimited for \$9.95 per month or 20¢/message
Data	Unlimited for \$9.95 per month
International Services	Calls to Mexico and Canada: 50¢/minute Other International Calls: \$1.25/minute
Directory Assistance	\$1.50/call within your home calling area (Pricing in other areas may vary)
Device Insurance	\$5.95 per month (Requires instant refill)

Included Features:

Nationwide Long Distance, Voice Mail, Call Waiting, Caller ID, Three-Way Calling and Incoming Text Messages

To receive Tribal Lifeline discounts, you must reside on land that meets the Bureau of Indian Affairs definition of reservation, specifically any federally recognized Native American tribe's reservation within U.S. Cellular's designated ETC coverage area. To purchase the Tribal Lands Prepaid Calling Lifeline Calling Plan or receive Lifeline discounts, you must participate in one of the eligible programs and reside within U.S. Cellular's ETC coverage area based on the zip code of your home address.

PLEASE NOTE: Prospective customers must have a billing address within U.S. Cellular's licensed markets to be eligible for service. Offers valid with two-year service agreement. All service agreements subject to early termination fee. Credit approval required. \$30 activation fee waived only when ordering online. \$15 equipment change fee. Roaming charges, fees, surcharges, overage charges, and taxes apply. 96¢ Regulatory Cost Recovery Fee applies; this is not a tax or government required charge. Network coverage and reliability may vary. Usage rounded up to the next full minute. Use of service constitutes acceptance of our terms and conditions. Other restrictions apply. National rate plans: U.S. Cellular reserves the right to terminate your service if less than 50% of your overall minutes in each of three consecutive billing cycles are used in U.S. Cellular's licensed markets. Family Plan: Limit 5 lines per account. Monthly charge of \$10.00 per line applies to lines 3-5. Mobile-to-Mobile rate applies to calls you make or receive to and from other U.S. Cellular customers in your Mobile-to-Mobile calling area (see map for details). Roaming indicator on your phone must be off for Mobile-to-Mobile rates to apply. Unlimited incoming calls are not deducted from package minutes and are available only when receiving calls in your calling area. Calling area differs from national calling area. Night and Weekend Minutes valid Monday through Friday 7 p.m. to 6:59 a.m., or 9 p.m. to 5:59 a.m. (depending on calling plan) and all day Saturday and Sunday. Night and Weekend Minutes are available throughout your rate plan calling area. Mobile-to-Mobile rate applies to calls you make or receive to and from other U.S. Cellular customers in your Mobile-to-Mobile calling area (see map for details). Roaming indicator on your phone must be off for Mobile-to-Mobile rates to apply.

U.S. Cellular website

<http://www.uscellular.com/plans/lifeline/index.html>

T-Mobile/204
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
CTIA Certification

June 2011

Steve Largent
President/CEO

June 22, 2010

REC'D JUL 08 2010

Ms. Susan Hacker
Director of Legal Affairs &
Associate General Counsel
Sales & Distribution
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006

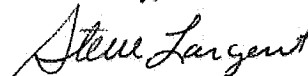
Dear Susan:

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, 2010 – December 31, 2010, 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.

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,


Steve Largent

Attachment

cc: Robert Dotson
Dave Miller



T-Mobile/205
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
Press Releases of J.D. Power & Associates

June 2011



Press Release

J.D. Power and Associates Reports: Interaction with Agents May Significantly Elevate Satisfaction with the Wireless Customer Care Experience

T-Mobile Ranks Highest in Wireless Customer Care Performance for Second Consecutive Time

WESTLAKE VILLAGE, Calif: 3 February 2011 — Customer service issues that are personally handled by a service representative, either over the phone or at a retail store, are significantly more satisfying to customers than are automated response interactions, according to the J.D. Power and Associates 2011 U.S. Wireless Customer Care Performance StudySM—Volume 1 released today.

Now in its ninth year, the semiannual study provides a detailed report card on how well wireless carriers service their customers in three contact methods: telephone calls with customer service representatives (CSR) and/or automated response systems (ARS); visits to a retail wireless store; and on the Web. Within each contact method, the study measures satisfaction and processing issues, such as problem-resolution efficiency and hold-time duration.

Overall, among customers who speak with a service representative without going through an automated response system, the customer care index score averages 774 on a 1,000-point scale, well above the industry average score of 739. Among customers who use other methods of contact, satisfaction is considerably lower:

Overall Customer Care Index Scores Based on Contact Method (on a 1,000-point scale)

Contact method	Index score
Telephone call with customer service representative	774
Industry average	739
Retail store	755
Automated response system*	704
Web-based contact	684

*Includes ARS/CSR and ARS only channels

The study finds that one of the main factors contributing to this performance disparity is the quality of the response provided. A service representative—either over the phone or in person—can answer both initial and follow-up questions from customers and clarify answers. This kind of flexibility is very limited in both ARS and Web-based contacts.

“As more companies encourage customers to contact them on the Web to save operating costs, they run the risk of increased customer churn if the number of contacts needed to resolve a complaint or issue rises,” said Kirk Parsons, senior director of wireless services at J.D. Power and Associates. “Switching intent is four times as high among those who rate their wireless carrier below average in customer care, so the challenge for wireless carriers is to offer an easy and efficient customer care transaction experience.”

The majority (51%) of telephone contacts are resolved primarily via a service representative. The study also finds that customers are most satisfied with their experience when they can reach a customer service representative quickly and spend only a brief period of time using automated systems to resolve their problem.

“While customers tend to be more satisfied when they can reach a service representative quickly, heavy reliance on live representatives is much more costly for wireless carriers,” said Parsons. “If wireless carriers can drive improvements in satisfaction with non-human interaction channels, overall customer care performance scores will improve dramatically by making the process more intuitive and efficient, and likely so in a much more cost-effective manner.”

T-Mobile ranks highest in wireless customer care performance for a second consecutive time with an overall score of 758. T-Mobile performs particularly well in phone contacts that originate in the ARS channel and are then transferred to a live service representative, and through phone calls made directly to a CSR. Verizon Wireless follows in the overall rankings with a score of 743 and performs well among customers who contact their service representative directly and among customers who contact their carrier online.

The study also finds several key wireless customer care patterns:

- Overall, 36 percent of wireless customers contact their carrier due to service and equipment-related issues, while 32 percent contact for general billing issues; 28 percent for incorrect charges; 23 percent for call quality; and 21 percent for price or cost.
- Wireless customers who indicate that they have had a positive care experience are more loyal and are, therefore, less likely to switch carriers in the future, on average. Among customers who indicate they “definitely will not switch” carriers in the next 12 months, customer care index scores average 810, compared with just 566 among those who say they “definitely will switch”—a difference of 244 points.
- Although the vast majority (88%) of customers get through to their carrier on their first try, 12% of customers are misdirected or put on hold for too long and must make more than one contact. The average wireless customer spends 6.24 minutes on hold when trying to reach their carrier via phone—a substantial increase from 5.27 minutes just six months ago.

The 2011 Wireless Customer Care Performance Study—Volume 1 is based on responses from 9,755 wireless customers who contacted their carrier’s customer care department within the past six months. The study was fielded from July through December 2010.

For more information, to read an article, or view wireless customer care ratings, please visit JDpower.com.

About J.D. Power and Associates

Headquartered in Westlake Village, Calif., J.D. Power and Associates is a global marketing information services company providing forecasting, performance improvement, social media and customer satisfaction insights and solutions. The company’s quality and satisfaction measurements are based on responses from millions of consumers annually. For more information on car reviews and ratings, car insurance, health insurance, cell phone ratings, and more, please visit JDpower.com. J.D. Power and Associates is a business unit of The McGraw-Hill Companies.

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John Tews; Troy, Mich.; (248) 312-4119; media.relations@jdpa.com
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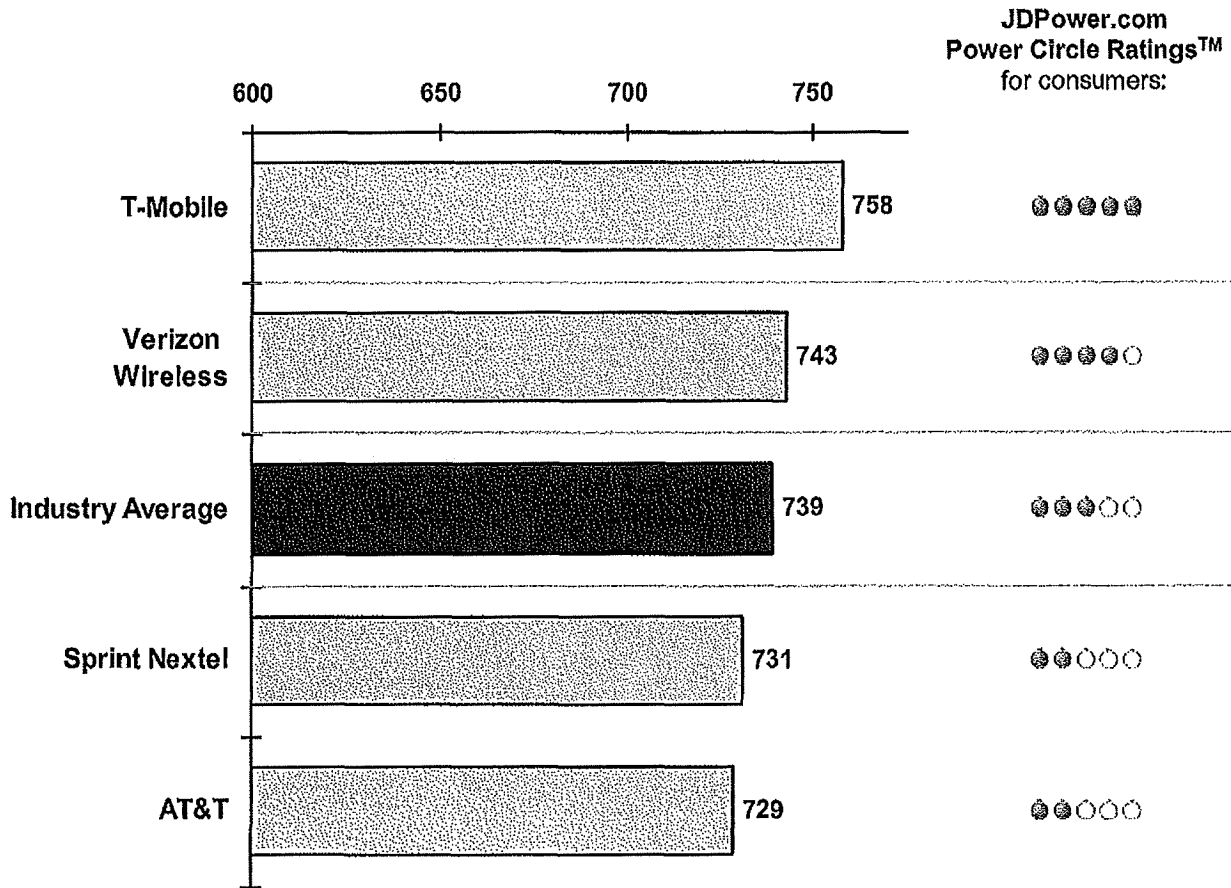
(Page 3 of 3)

NOTE: One chart follows.

J.D. Power and Associates 2011 U.S. Wireless Customer Care Performance StudySM— Volume 1

Overall Customer Care Index Rankings

(Based on a 1,000-point scale)



Source: J.D. Power and Associates 2011 U.S. Wireless Customer Care Performance StudySM—Volume 1

Power Circle Ratings Legend
○○○○○ Among the best
○○○○○ Better than most
○○○○○ About average
○○○○○ The rest

Charts and graphs extracted from this press release must be accompanied by a statement identifying J.D. Power and Associates as the publisher and the J.D. Power and Associates 2011 U.S. Wireless Customer Care Performance StudySM—Volume 1 as the source. Rankings are based on numerical scores, and not necessarily on statistical significance. JDPower.com Power Circle RatingsTM are derived from consumer ratings in J.D. Power studies. For more information on Power Circle Ratings, visit jdpower.com/faqs. No advertising or other promotional use can be made of the information in this release or J.D. Power and Associates survey results without the express prior written consent of J.D. Power and Associates.



Press Release

**J.D. Power and Associates Reports:
Spending Sufficient Time Explaining Mobile Device Operation
Is Critical to Higher Satisfaction with the Wireless Retail Sales Process**

T-Mobile Ranks Highest in Wireless Retail Sales Satisfaction for a Fourth Consecutive Time

WESTLAKE VILLAGE, Calif: 17 February 2011 — Although overall satisfaction generally declines as the length of the wireless retail sales process increases, lengthy periods explaining the device's operation do not negatively impact retail sales satisfaction, according to the J.D. Power and Associates 2011 U.S. Wireless Retail Sales Satisfaction StudySM—Volume 1 released today.

Now in its eighth year, the semiannual study analyzes evaluations from customers who recently had an in-store wireless retail sales experience. Overall customer satisfaction with major wireless carrier-branded stores is based on four factors: staff (49%); price and promotion (27%); store facility (14%); and store display (10%).

The study finds that as the amount of time spent during the wireless retail sales transaction increases, customer satisfaction generally declines. Among customers who wait longer than two minutes to be greeted when entering the retail facility, overall satisfaction is 103 points lower than among those who are greeted within two minutes (762 vs. 659 on a 1,000-point scale).

This decline in satisfaction holds true for all stages of the sales process with one crucial exception: the time taken to explain the wireless device operation. In fact, satisfaction increases as the time spent explaining the device's operation increases. Overall satisfaction among customers who receive an explanation in less than one minute is 740, compared with 758 among those who receive an explanation between five and 10 minutes in length. The average reported time to explain device operation is six minutes.

"Within the past year, there have been a number of new product and service plan innovations where, in most cases, customers needed to be re-educated in terms of device operation usage and how they can get the most from their phone," said Kirk Parsons, senior director of wireless services at J.D. Power and Associates. "Instructing customers on operating particular devices affords salespersons an opportunity to display their own knowledge, as well as to showcase the handset lineup and latest offerings. As smartphone adoption rates continue to climb, this practice becomes even more important, as the average monthly spending is \$6 more among customers who received a device operation explanation, compared with those who did not."

Overall satisfaction with the retail sales process decreases dramatically when customers are not given adequate time to shop due to pressure from the salesperson to rush the sales process. Satisfaction among customers who indicate having experienced this kind of pressure during the sales process averages 124 points lower (630) than among customers who indicate not having experienced pressure (754).

T-Mobile ranks highest in customer satisfaction among major wireless carrier-owned retail stores for a fourth consecutive time with a score of 739, performing particularly well in price and promotions, such as

competitiveness of service plans and devices offered. Sprint Nextel (730) follows T-Mobile in the rankings and also performs well in price and promotions.

The study also finds the following key retail wireless sales transaction patterns:

- Nearly three-fourths of customers indicate that a salesperson offered to explain the number of plan minutes during their most recent visit—a decrease of four percentage points from six months ago. Four in 10 customers indicate having been shown a coverage map or an explanation of the latest technology—an increase of four percentage points during the same time period.
- The average total time customers spent in the retail store to complete the sales transaction was approximately 57 minutes—an increase of one minute, compared with six months ago.
- Satisfaction with the retail experience among smartphone owners is 24 points higher than among owners of traditional handsets (742 vs. 718, respectively). Overall retail sales satisfaction among new smartphone owners of devices that run on the Android OS platform is higher, due mainly to aggressive price/promotion activities.
- More than one-half (56%) of wireless customers visit their retailer to upgrade or replace a phone from their current carrier. Renewing or changing an existing wireless plan (38%) and purchasing a new device (31%) round out the top reasons customers cite for having visited a retail store within the past six months.

The 2011 U.S. Wireless Retail Sales Satisfaction Study—Volume 1 is based on experiences reported by 8,501 wireless customers who completed a retail sales transaction within the past six months. The study was fielded between July and December 2010.

For more information or to [view wireless retail ratings](#), please visit [JDPower.com](#).

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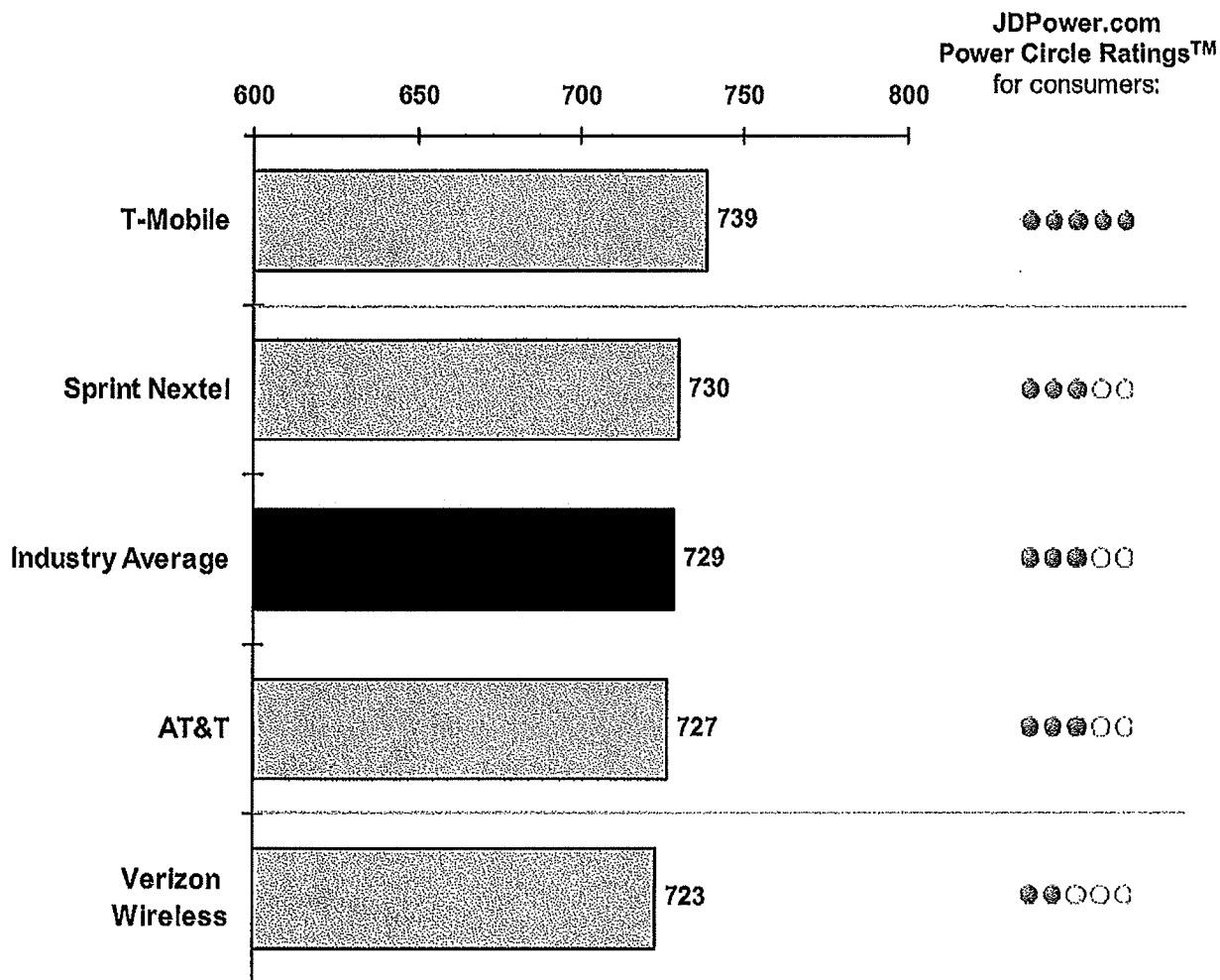
(Page 2 of 2)

NOTE: One chart follows.

J.D. Power and Associates 2011 Wireless Retail Sales Satisfaction StudySM –Volume 1

Overall Retail Sales Index Rankings

(Based on a 1,000-point scale)



JDPower.com
Power Circle RatingsTM
for consumers:

Power Circle Ratings Legend
○○○○○ Among the best
○○○○○ Better than most
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Source: J.D. Power and Associates 2011 Wireless Retail Sales Satisfaction StudySM–Volume 1

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T-Mobile/206
Witness: Rhonda Thomas

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Rhonda Thomas
T-Mobile Business Continuity Program Summary

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

June 2011

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1511

IN THE MATTER OF T-MOBILE WEST)
CORPORATION'S APPLICATION FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER.)

T-MOBILE WEST CORPORATION

DIRECT TESTIMONY

OF

GENE DEJORDY

REDACTED

June 2, 2011

1 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

2 A. My name is Gene DeJordy. I am an independent consultant retained by T-Mobile West
3 Corporation ("T-Mobile" or "Company") to develop the Network Improvement Plan
4 ("NIP") and provide testimony in this case. My business address is P.O. Box 901,
5 Southport, Connecticut 06890. I am a sole practitioner providing legal, regulatory,
6 government affairs, and business development services to individuals, companies,
7 associations, and groups.

8 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERTISE WITH RESPECT TO**
9 **UNIVERSAL SERVICE AND ELIGIBLE TELECOMMUNICATIONS CARRIER**
10 **DESIGNATIONS.**

11 A. I worked as an attorney with the Federal Communications Commission ("FCC") and then
12 for the law firm of Swidler and Berlin in the District of Columbia where I provided legal
13 and regulatory advice and guidance on telecommunications matters, including the
14 Telecommunications Act of 1996, which includes the legal framework for competitive
15 eligible telecommunications carrier ("CETC") designations and receipt of federal
16 universal service support. Beginning in 1995, I became responsible for legal and
17 regulatory affairs for Western Wireless Corporation (who was later acquired by Alltel
18 Corporation) which worked with the FCC and state commissions to establish many of the
19 regulations and orders governing the designation of competitive carriers as ETCs.
20 Attached as Exhibit T-Mobile/301 is a copy of my curriculum vitae.

21 **Q. PLEASE DESCRIBE YOUR ENGAGEMENT WITH T-MOBILE WITH RESPECT TO**
22 **ITS ETC APPLICATION.**

23 A. I was originally retained by T-Mobile in 2008 for the Company's due diligence review of
24 SunCom Wireless. In particular, I reviewed SunCom Wireless' universal service
25 operations in Puerto Rico and the pending SunCom ETC applications in Tennessee,
26 North Carolina and Virginia. Following the acquisition of SunCom Wireless, I have

1 assisted the Company in establishing a universal service program, including on-going
2 compliance and new ETC applications.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

4 **A.** The purpose of my testimony is to discuss T-Mobile's planned use of universal service
5 funding as set forth in T-Mobile's NIP. I also explain the public interest benefits that will
6 be realized by designating T-Mobile as an ETC.

7
8 ***T-Mobile Will Use Universal Service Funding for its Intended***

9 ***Purposes as Demonstrated by its NIP and Certifications***

10 **Q. WILL T-MOBILE USE THE UNIVERSAL FUNDING FOR ITS INTENDED PURPOSES?**

11 **A.** Yes. Exhibit T-Mobile/302 to my testimony is the Affidavit of H. Skip Cornett, the
12 Company's Vice President of Tax. In his Affidavit, Mr. Cornett affirms that the Company
13 will use the universal service funds it receives only for the provision, maintenance and
14 upgrading facilities and services for which the support is intended. In addition, the
15 Company has submitted a five year NIP as part of its ETC Application which provides
16 detail on the Company's plans for use of universal service funds. Attached as
17 Confidential Exhibit T-Mobile/303 is T-Mobile's NIP, which was originally filed with the
18 Commission on December 16, 2010.

19 **Q. BASED UPON THE WORKSHOP HELD ON APRIL 28, 2011, IS T-MOBILE**
20 **SUBMITTING A REVISED NIP USING THE FORMAT REQUESTED BY STAFF?**

21 **A.** Yes, attached as Confidential Exhibit T-Mobile/304 is a copy of T-Mobile's revised 5-year
22 NIP, reformatted based upon discussions with Commission Staff ("Revised NIP"). In this
23 version of its NIP, the previously identified capital and operating expenditures remain the
24 same. However, the Revised NIP breaks down planned capital expenditures during the
25 first two years beginning in October 2011 based upon anticipated eligibility for universal

1 service funding on October 1, 2011. In addition, the Revised NIP provides the
2 Company's higher level plans for the three years beginning on October 1, 2013.

3 **Q. PLEASE EXPLAIN THE BACKGROUND ON THE PREPARATION OF THE ORIGINAL**
4 **AND REVISED NIPS.**

5 A. T-Mobile prepared its original NIP in early 2010 in anticipation of filing an application for
6 ETC designation soon thereafter. At the time it prepared the NIP, T-Mobile expected that
7 it would receive ETC designation in Oregon before the end of 2010. The ETC
8 application, however, was not filed until December 2010 and, based upon the procedural
9 schedule and workshop held on April 28, 2011, the Revised NIP is being refiled with my
10 testimony detailing universal service expenditures for a two-year period beginning on
11 October 1, 2011.

12 **Q. WHAT HAS YOUR ROLE BEEN IN PREPARING THE ORIGINAL NIP AND THE**
13 **REVISED NIP?**

14 A. I work directly with individuals within the engineering, operations, finance, and
15 legal/regulatory groups at T-Mobile in establishing internal processes to implement all
16 applicable universal service requirements, including the requirement for the use of
17 universal service support.

18 **Q. DOES THE NIP MEET THE REQUIREMENTS FOR THE USE OF UNIVERSAL**
19 **SERVICE SUPPORT, AND, IF SO, PLEASE EXPLAIN?**

20 A. Yes. The NIP reflects the receipt and proper use of *Confidential* [REDACTED] *Confidential*
21 in projected high-cost federal universal service funding in 2011 for the period October 1
22 through December 31, and *Confidential* [REDACTED] *Confidential* in projected high-cost
23 federal universal service funding in 2012 and again in 2013.

24 **Q. HOW WILL OREGON CONSUMERS BENEFIT FROM T-MOBILE'S RECEIPT OF**
25 **FEDERAL UNIVERSAL SERVICE FUNDING?**

1 A. Oregon consumers will significantly benefit from T-Mobile's receipt of federal universal
2 service funding by (i) obtaining access to T-Mobile's wireless service in new coverage
3 areas; and (ii) having access to a wireless network with increased capacity and service
4 quality to meet their communications needs.

5 **Q. DOES T-MOBILE'S NIP DEMONSTRATE THESE BENEFITS TO CONSUMERS, AND**
6 **IF SO, HOW?**

7 A. Yes. As demonstrated in both the original and Revised NIP T-Mobile will be constructing
8 numerous cell sites serving rural areas that otherwise would not be built without
9 universal service funding.

10

11 ***T-Mobile's Designation as an ETC is in the Public Interest***

12 **Q. IS THE DESIGNATION OF T-MOBILE IN THE PUBLIC INTEREST, AND IF SO, WHY?**

13 A. Designation of T-Mobile as an ETC would be in the public interest for the following
14 reasons:

15 *First*, receipt of universal service support will allow T-Mobile to continue to
16 improve its coverage and expand its footprint into areas it currently does not serve,
17 thereby enhancing consumers' access to T-Mobile's network and services. Specifically,
18 high-cost universal service funding will enable T-Mobile to construct new cell sites and
19 increase coverage in rural areas that are currently unserved or underserved by T-Mobile.
20 As a result, customers in rural areas, who traditionally have far fewer alternatives for
21 wireless service than those in urban areas, will have the choice of an additional carrier
22 with (as explained in Ms. Thomas' and Mr. Piekarczyk's testimony) excellent service
23 quality, award-winning customer service and a competitive array of offerings. Expanding
24 coverage, especially in rural areas, and increasing capacity and service quality
25 throughout the wireless network is important as consumers increasingly rely on wireless
26 service for their communications needs, including access to emergency services. Thus,

1 T-Mobile's designation as an ETC will enable rural consumers to achieve "comparability"
2 to their urban counterparts, as envisioned by Telecommunications Act of 1996.

3 *Second*, as discussed by Ms. Thomas, if T-Mobile is granted ETC status, the
4 Company will offer customers its Lifeline plan, not only in those areas where it obtains
5 ETC status, but in any part of the state reached by its network. This commitment is
6 designed to benefit customers living in portions of the state with very few or no
7 competitive alternatives for Lifeline service, and is therefore in the public interest.

8 **Q. WITHOUT UNIVERSAL SERVICE SUPPORT, WILL T-MOBILE BE ABLE TO BUILD**
9 **OUT ITS NETWORK TO SERVE THE NEEDS OF CONSUMERS?**

10 **A.** No. The cost to build out and operate a network in rural areas and the cost to establish
11 high quality service throughout T-Mobile's service area is significant. T-Mobile has
12 limited funding available each year to cover these costs, so universal service support is
13 necessary for a carrier to serve consumers throughout rural areas.

14 **Q. WILL T-MOBILE'S RECEIPT OF UNIVERSAL SERVICE SUPPORT INCREASE THE**
15 **SIZE OF THE UNIVERSAL SERVICE FUND?**

16 **A.** No. Due to the cap on competitive ETCs imposed by the FCC, T-Mobile's designation
17 as an ETC will not increase the size of, or otherwise adversely impact, the federal
18 universal service fund.

19 **Q. HAS T-MOBILE CALCULATED THE IMPACT OF ITS DESIGNATION AS AN ETC ON**
20 **THE CETC CAP IN OREGON?**

21 **A.** Yes. T-Mobile projects that its designation as an ETC will result in an adjusted cap
22 factor of approximately *Confidential* ■ *Confidential* percent, which means that high-cost
23 universal funding for CETCs in Oregon will be adjusted downward by approximately
24 *Confidential* ■ *Confidential*. For example, if a CETC in Oregon would be eligible to
25 receive *Confidential* ■ *Confidential* in uncapped high-cost universal service funding,
26 then based upon the CETC cap and T-Mobile's entry into the universal service market,

1 the same CETC would receive *Confidential* [REDACTED] *Confidential*.

2 **Q. WILL THE IMPACT OF THE CAP PREVENT EXISTING CETCs FROM RECOVERING**
3 **THEIR COSTS TO PROVIDE SUPPORT IN HIGH COST AREAS?**

4 A. No. The FCC allows competitive ETCs to obtain support at uncapped levels-- that is
5 support at the level prior to new competitive ETCs entering the market-- if the carrier can
6 demonstrate that it would be unable to recover its actual costs at the new capped level.
7 Therefore, to the extent that a competitive ETC believes that its costs justify additional
8 support, there is a specific mechanism in place under federal law to address this
9 situation. The FCC concluded in its *CETC Cap Order*, FCC 09-122 at ¶ 31 that: "a
10 competitive ETC will not be subject to the interim cap to the extent that it files cost data
11 demonstrating that its costs meet the support threshold in the same manner as the
12 incumbent LEC."

13 **Q. GIVEN THE PROJECTED IMPACT OF T-MOBILE'S DESIGNATION AS AN ETC ON**
14 **EXISTING ETCS, IS DESIGNATION OF T-MOBILE AS AN ETC STILL IN THE**
15 **PUBLIC INTEREST?**

16 A. Yes, most definitely. For the reasons described above, T-Mobile's designation as an
17 ETC will benefit consumers. In addition, it would be disingenuous, at best, for CETCs to
18 argue that the impact of T-Mobile's designation as an ETC would adversely impact their
19 universal service operations because these are the same arguments made by some
20 rural telephone companies when CETCs first attempted to enter the universal service
21 market. For these same CETCs to now argue that they should be protected from
22 competition and made whole from any competitive impact is an argument focused on
23 their own benefits, not the benefits to be realized by rural consumers from T-Mobile's
24 entry into the universal service market.

25
26 ***Conclusion***

1 **Q. HAS T-MOBILE DEMONSTRATED THAT IT WILL USE UNIVERSAL SERVICE**
2 **FUNDING FOR ITS INTENDED PURPOSES AND THAT DESIGNATION OF T-**
3 **MOBILE AS AN ETC IS IN THE PUBLIC INTEREST?**

4 A. Yes. T-Mobile has an extensive network in place today to serve consumers and has
5 committed to expand its network to serve consumers throughout its ETC service area
6 consistent with applicable rules and orders. Furthermore, the designation of T-Mobile as
7 an ETC will greatly benefit consumers and is in the public interest.

8 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

9 A. Yes.

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T-Mobile/301
Witness: Gene DeJordy

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Gene DeJordy
Curriculum Vitae

June 2011

Gene DeJordy
Background Statement
December 2010

-
- Experience** **Founder, Native American Telecom Enterprise, LLC.** Established a broadband and local telephone carrier on Native American Indian reservations using WiMAX and other wireless technologies; identify, develop, and implement telecommunications businesses eligible for various funding sources for start-up and on-going operations (July 08 – present).
Attorney/Consultant, Dakelyn Consulting, Connecticut and Washington, D.C. Provide legal, regulatory, public policy, government affairs, and business development consulting to communications companies; identify telecom opportunities for start-up and developing companies; provide due diligence review of new acquisitions and established business ventures (Nov 07 to present).
Senior Vice President, Alltel, Little Rock, Arkansas. Part of the senior operations team (sales, marketing, finance, business development, regulatory); responsible for regulatory affairs, universal service operations, ETC matters, interconnection, E911, and other legal and public policy matters for a national wireless carrier; staff of 37 individuals, including 4 in-house attorneys and outside counsel in 35 states and DC (Aug 05 – Nov 07 upon sale to GS/TPG).
Vice President of Legal/Regulatory Affairs, Western Wireless, Bellevue, WA. Responsible for: legal, regulatory and legislative affairs at the federal, state, and local level; regulatory business development, including universal service, CLEC, broadband and internet service, and Indian reservations; legal matters and litigation arising from regulatory issues; negotiation of agreements governing telecommunications services; compliance with local, state, and federal requirements imposed on wireless service providers; implementation of government mandates, such as E911 (Dec 95 – Aug 05).
Attorney, Swidler and Berlin, Washington, D.C. Responsible for providing legal advice to a diverse clientele of video companies, competitive providers, wireless carriers, interexchange carriers, manufacturers and other entities in the telecommunications industry, and foreign governments (Sep 93 – Dec 95).
Regulatory Counsel, Federal Communications Commission, Washington, D.C. Worked on a wide range of common carrier issues (Aug 92 – Sep 93).
Business Manager and Engineer, International Thomsen and Mitre Corporation, Massachusetts. Prior to law school, worked as an engineer and then as a manager for a start-up telecommunications business.
- Education** **Juris Doctorate, Catholic University of America, Washington, D.C.** Graduated top 20% of class in 1992 (1989 – 1992)
Master of Science, Telecommunications Policy, George Washington University, Washington, D.C., 3.6 GPA
Bachelor of Science, Technology and Management, University of Maryland, College Park, Maryland

Gene DeJordy
Dakelyn Consulting
Native American Telecom Enterprise, LLC
P.O. Box 901, Southport, Connecticut 06890
501-804-7797(Mobile); E-Mail: Gene@Dakelyn.com

Gene DeJordy Specific Accomplishments

Business Operations

Established Native American Telecom Enterprise, LLC to develop businesses on Indian reservations.
Created tribally owned entities on the Crow Creek and Pine Ridge reservations.
Manage the design, construction, and operation of telecommunications businesses.
Manage the universal service operations (sales, engineering, operations) for a mobile wireless carrier.

Legal Management

Established a legal, regulatory, and government affairs consulting practice (Dakelyn Consulting).
Established a legal/regulatory department designed to create business opportunities, enhance operational efficiencies, further political and public policy objectives, and ensure compliance with a myriad of legal and regulatory obligations.
Manage legal/regulatory group of 37 individuals.
Manage extensive network of outside attorneys/consultants in 35 states and D.C.
Oversee a multi-million dollar budget for legal and consulting expenses.

Regulatory Development

Established the largest competitive carrier eligible for more than \$350M in universal service support.
Obtained all regulatory approvals for a company to provide competitive local and long distance telecommunications services in more than 20 states.
Established a telecommunications business to provide wireless broadband service on Indian reservations.
Successful advocate on public policy. Positioned a company to be a recognized leader in advocating its interest before Congress and the FCC on wireless issues; established a D.C. office to increase a company's presence and influence.
Establish key relationships with state governments and Indian tribes. Entered into a historic agreement with an Indian Tribe for the construction of a wireless network; secured key relationships with influential state and local government officials resulting in decisions that created a favorable business environment.
Choreograph Successful Public/Media Affairs. Arranged signing ceremony involving members of Congress, the Administration, and FCC; coordinated media campaign and public relations campaign to maximize exposure of a company; positioned a company to participate in key forums at federal and state level.
Lobbying/Witness/Advocate. Lobby members of Congress, federal officials, and state governments; testify; panelist at industry events; publicly advocate position.
Reversal of Forfeiture. Obtained reversal of two notices of apparent liability, one for alleged anti-collusion and the other for alleged environmental violations.
Preemption of Anti-Competitive State Practices. Obtained FCC decisions declaring certain provisions of the Kansas state universal service fund to be invalid and South Dakota's denial of universal service eligibility to be unlawful.
Won 16 Interconnection arbitration cases. Won precedent setting interconnection arbitrations establishing cost-based rates.
Obtained entry into the universal service market. Became first competitive carrier in the country to obtain universal service support in rural telco areas.
Influential on public policy. Successful in positioning a company to be influential on key telecommunications issues before state legislatures and regulatory commissions, resulting in favorable legislation and regulation.
Antitrust Victory. Obtained a precedent setting antitrust decision against a telephone company for disconnecting interconnection service.
Interconnection Wins. Secured court decisions affirming state arbitration decisions.
Wireless Local Loop Favorable Decision. Obtained favorable court decisions through ND Supreme Court that wireless offering is not subject to state regulation.
Universal Service Entry Barriers Eliminated. Obtained ND and SD court decisions overturning state denial of entry into the universal service market.
Compliance. Established an excellent record of compliance with a myriad of local, state and federal regulations; established a detailed compliance program to ensure that a company is in compliance with applicable legal and regulatory requirements; implement controls to meet the requirements of Sarbanes-Oxley legislation.
Due Diligence. Performed due diligence for the acquisition of companies and business groups.

T-Mobile/302
Witness: Gene DeJordy

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Gene DeJordy
Affidavit of Skip Cornett

June 2011

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

3 4 5	In the Matter of T-Mobile West Corporation Application for Designation as an Eligible Telecommunications Carrier)))	Affidavit of H. Skip Cornett
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7 I, H. Skip Cornett, do hereby affirm as follows:

- 8 1. I am Vice President, Tax of T-Mobile USA, Inc., which is the parent company
 9 of T-Mobile West Corporation ("T-Mobile").
- 10 2. I am authorized to make this affidavit in support of T-Mobile's Application
 11 for Designation as an Eligible Telecommunications Carrier before the Public
 12 Utility Commission of Oregon.
- 13 2. T-Mobile will use the universal support it receives only for the provision,
 14 maintenance, and upgrading facilities and services for which the support is
 15 intended, in accordance with Section 254(e) of the Telecommunications Act
 16 of 1996.

17

18 DATED: December 2, 2010. H. Skip Cornett

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20

21

H. Skip Cornett

 Vice President, Tax
 T-Mobile USA, Inc.

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23

SUBSCRIBED AND SWORN TO before me this 2nd day of December 2010.

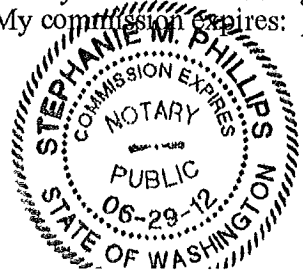
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Stephanie M. Phillips

 Notary Public for Washington
 My commission expires: 6/29/2012



T-Mobile/303
Witness: Gene DeJordy

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Gene DeJordy
Network Improvement Plan

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

June 2011

T-Mobile/304
Witness: Gene DeJordy

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

T-MOBILE WEST CORPORATION

Exhibit Accompanying Testimony of Gene DeJordy
Revised Network Improvement Plan

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

June 2011