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By Electronic Filing

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Promoting Interoperability in the 700 MHz
Commercial Spectrum, WT Docket No. 12-69

Final Progress Report on AT&T Commitments

Dear Ms. Dortch:

On October 25, 2013, the FCC adopted a Report and Order in the matter of “Promoting Interoperability in the 700MHz Commercial Spectrum”. As part of this order, AT&T is required to provide a periodic written report and meet with the Commission staff to demonstrate progress made toward the commitments outlined in the its September 10, 2013 commitment letter. Attachment 1 summarizes the commitments made by AT&T and the progress toward these commitments as part of its final progress report. Attachment 2 includes a certification to the Commission that it has completed these commitments.

In accordance with the Commission’s rules, this letter is being filed in the above referenced dockets via the FCC’s Electronic Comments Filing System.

Should you have any questions regarding the above, please feel free to contact me directly

Sincerely,

/s/ Joseph P. Marx

Attachments

**Attachment 1: AT&T Commitments on 700MHz Interoperability
Report of Progress as of January 10, 2017**

Per the Fourth Progress Report¹, the FCC goal of promoting interoperability in the Lower 700MHz spectrum has been met. In the intervening year since the Fourth Progress Report, there is near universal availability of Band 12 devices for smaller carriers and a plethora of new devices have been introduced. In addition, carriers have continued to roll-out Voice over LTE service on 700MHz A-Block Spectrum.

As to AT&T's specific commitments, we report as follows:

- 1) AT&T commits to moving forward expeditiously with testing the 3GPP Multi-Frequency Band Indicator software feature as soon as it is made available to AT&T by its RAN vendors. AT&T further agrees to fully deploy the new MFBI software feature in its 700 MHz network within 24 months of September 30, 2013. The end of the 24-month period will also commence the beginning of the device roll-out period.

Status Update: Complete

- 2) Once MFBI has been fully implemented by AT&T consistent with paragraph 2, AT&T shall provide LTE roaming to carriers with compatible Band 12 devices, consistent with the Commission's rules on roaming.

Status Update:

Per the last update, the 3GPP Standard to support VoLTE Roaming on the S8 Home Routing Architecture was complete with Stage 2 approval. We expect to have this standardized solution fully deployed by the end of the year, which will solve the issue of Emergency Calling while roaming on a VoLTE Network with incompatible 3G Networks.

As of January, we are now supporting VoLTE Roaming for domestic carriers that have compatible 3G Networks and support international VoLTE Roaming as of May. We will also have a pre-standard solution in place for domestic carriers with an incompatible 3G Network by the end of 3rd Quarter of 2017.

The Transition

- 3) During the first year of the device roll-out period, 50% of all new unique devices that operate on the paired Lower 700 MHz bands, as identified by unique SKU numbers, introduced by AT&T into its device portfolio will be Band 12 capable devices. Memory or color finish variations on a single device shall not be considered separate unique SKUs. Machine-to- Machine (M-to-M) devices shall not be counted as "new unique devices" for

¹ See <https://ecfsapi.fcc.gov/file/60001525255.pdf>.

**Attachment 1: AT&T Commitments on 700MHz Interoperability
Report of Progress as of January 10, 2017**

purposes of this commitment.

Status Update: Complete

- 4) During the second year of the device roll-out period, 75% of new unique devices that operate on the paired Lower 700 MHz bands, as identified by unique SKU numbers, introduced by AT&T into its device portfolio will be Band 12 capable devices. Memory or color finish variations on a single device shall not be considered separate unique SKUs. M-to-M devices shall not be counted as “new unique devices” for purposes of this commitment.

Status Update: Complete

- 5) Commencing at the conclusion of the second year of the device roll-out period, all new unique devices that operate on the paired Lower 700 MHz bands introduced by AT&T into its device portfolio will be Band 12 capable devices. In addition, from that time forward, AT&T will agree that its specifications for all new devices that are designed to operate in the paired Lower 700 MHz frequencies, including M-to-M devices, will call for Band 12 capability. However, M-to-M devices shall not be counted as “new unique devices” for purposes of this commitment.

Status Update: As of July 10, 2017, 100% of new unique devices that operate on the paired Lower 700MHz bands introduced by AT&T are Band 12 capable devices. And as noted in the previous report, 100% of all new unique M-to-M devices introduced by AT&T are Band 12 capable devices.

This was the final benchmark and have met the requirements of the Order for device deployment.

- 6) To demonstrate progress on its commitments, AT&T shall submit comprehensive written reports and meet with the Commission staff at each of 12 months, 18 months and 24 months from the date of its September 10, 2013 commitment letter that will provide information on AT&T’s progress toward meeting these commitments. Additionally, AT&T shall provide comprehensive written reports at 28 months, 40 months and 46 months to report on progress during the device roll-out period, and it shall file a certification to the Commission at the end of the device roll-out period to certify final completion of these commitments within 30 days.

Status Update: This is the sixth and final report (46-month report on progress).

- 7) Consistent with these commitments, AT&T anticipates that its focus and advocacy within the 3GPP standards setting process will shift to Band 12 related projects and work streams. More specifically, upon adoption of this commitment, AT&T commits to placing priority within the 3GPP RAN committee on the development of various Band 12 carrier aggregation scenarios. Upon completing implementation of the MFBI feature, AT&T anticipates that its focus on new standards related to the paired Lower 700 MHz spectrum

Attachment 1: AT&T Commitments on 700MHz Interoperability
Report of Progress as of January 10, 2017

will be almost exclusively on Band 12 configurations, features and capabilities. AT&T reserves the right to seek revisions and updates to Band 17 standards to the extent necessary to support legacy Band 17 devices and continuing Band 17 functionality on its network.

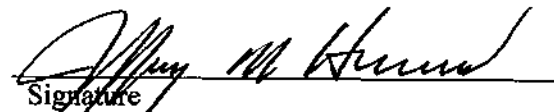
Status Update: Complete

Attachment 2:

**2017 Certification of Compliance
With FCC Requirements on Promoting Interoperability
Requirements in 700MHz Commercial Spectrum
WT Docket No. 12-69**

On behalf of AT&T Mobility, LLC, on behalf of itself and its wireless affiliates (hereinafter "AT&T"), I hereby certify to the best of my knowledge, information, and belief that AT&T has implemented the following commitments as of July 10, 2017:

1. AT&T has fully implemented the Multi-Frequency Band Indicator Feature (MFBI) in its 700MHz Radio Access Network.
2. AT&T is providing LTE roaming to carriers with compatible Band 12 devices consistent with the Commission's rules on roaming.
3. As of July 10, 2017, all new devices operating on the paired Lower 700MHz bands introduced by AT&T into its device portfolio are Band 12 capable devices.


Signature

Jeffrey N. Howard
Print Name

VP-Mobile Device Portfolio
Title

6/30/2017
Date