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November 12, 2014

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: AT&T Response to Connect America Phase II Challenge Process –
FCC Form 505 (Late Filed)
WC Docket No. 14-93**

Dear Ms. Dortch:

Pursuant to the FCC's Public Notice¹ in the above referenced proceeding, AT&T Services, Inc., on behalf of its wireline affiliates, hereby submits its response to several challenges of particular census blocks via the FCC's Form 505. AT&T respectfully requests that the FCC accept its late filed response, which, with the federal holiday, it is making one day late. As required, AT&T also provided a copy via email to Form505@fcc.gov.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachment

¹ DA 14-1397

Connect America Phase II Challenge Process Form

OMB Control Number 3060-1188

FCC Form 505

Filing Entity: AT&T Services, Inc. (on behalf of its wireline affiliates)

FRN (if applicable): 0008644056

Name of Person Filling Out Form: Anisa Latif

Mailing Address of Person Filling Out Form: 1120 20th Street, NW, Suite 1000, Washington, D.C. 20036

Email Address of Person Filling Out Form: al7161@att.com

Phone Number of Person Filling Out Form: 202-457-3068

Name of Person Certifying Data within Form: Michael Lieberman

Mailing Address of Person Certifying Data within Form: One AT&T Way, Bedminster, NJ 07921

Email Address of Person Certifying Data within Form: ml2965@att.com

Phone Number of Person Certifying Data within Form: 908-532-1189

Served to Unserved Challenge

Census Block 15 Digit FIPS Code	State	Provider Name As Listed in National Broadband Map	Insert X if Speed Criteria Not Met	Insert X if Usage Allowance Criteria Not Met	Insert X if Latency Criteria Not Met	Insert X if Price Criteria Not Met	Insert X if Voice Criteria Not Met	Type of Supporting Evidence	Additional Comments	OMB Control Number: 3060-1188
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Unserviced to Served Challenge

Census Block 15 Digit FIPS Code	State	Name of Entity Providing Service	FRN used to File Form 477 (if challenge being filed by the service provider)	Insert an X if you certify that this census block is served by unsubsidized broadband and voice services meeting the Commission's performance and pricing criteria.	Type of Supporting Evidence	Additional Comments	OMB Control Number 3060-1188
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OMB Control Number 3060-1188

Accuracy and Due Diligence Certification

All Filers Must Fill Out

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials: ML

Date: 11/12/2014

Notice of Challenge Certification

(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)

Service of Notice Successful

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

Service of Notice Unsuccessful

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties
that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

Written Statement of Executive Director of Regulatory Planning and Policy, Survey Methodology and Results

My name is Michael Lieberman. I hereby certify that, to the best of my knowledge and belief, the following information is true and correct. As the Executive Director of AT&T Service Inc.'s Regulatory Planning and Policy organization within Corporate External Affairs, I directed and oversaw a two-phase analysis of challenges to FCC-identified CAF Phase II-eligible census blocks within AT&T's price cap carriers' service territories. The analysis I describe below was used to evaluate challengers' claims that they provide broadband service to 6,454 CAF Phase II-eligible census blocks.

In the initial phase, AT&T, through a consultant retained for this project, obtained phone numbers and addresses in as many of the 6,454 challenged census blocks as possible. This information came from the database of a direct mail provider (Equifax), which contains a comprehensive list of living unit addresses. When even one location in a census block was found to be a voice subscriber of the particular challenger, then AT&T treated that entire census block as broadband positive, or lit. Using this conservative methodology, AT&T eliminated 35% of the tested census blocks before continuing to the second phase of its analysis.

For the second phase, AT&T (again through its consultant) reviewed challenges that met both of the following criteria:

1. The census block was not eliminated as part of the first phase; and
2. The challenging entity provides a web link to look up whether an address can get broadband service.

In several cases the challenging cable company recommends a third party site, <http://www.cablemover.com/home>, to help determine if cable service offerings are available for a given address.

Fifteen of the challengers met these two criteria and thus 801 of the 6,454 census blocks were examined in the second phase. For each of these 801 census blocks, AT&T's consultant entered all of the addresses and zip codes from the direct mail database that could be geocoded into the respective challengers' website forms -- one location at a time. If the challenger's website indicated that broadband was available at even one location in the challenged census block, then AT&T deemed the entire census block as being broadband positive, or lit. At the conclusion of this second phase of the analysis, AT&T determined that 322 of the challenged census blocks are not broadband positive because, according to the challenger's website, it does not offer broadband service to any of the addresses in the census blocks that AT&T lists on the attached Form 505.