



Interstate Common Line Support (ICLS)

2008 - 2009

March 31, 2009

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

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

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

AT&T Mobility, on behalf of its wholly owned affiliates, recently learned that it has not received interstate common line support (ICLS) in 2009 for providing supported service throughout its eligible telecommunications carrier (ETC) designated service areas in West Virginia despite having timely filed its certification pursuant to section 54.904. 47 C.F.R. § 54.904(d). Specifically, on or before June 30, 2008 AT&T Mobility Corporation certified on behalf of Highland Cellular, LLC and American Cellular Corporation in West Virginia that ICLS would only be used for the provision, maintenance and upgrading of facilities and services for which the support is intended. See attached **Exhibit A** for the complete filing made on or before June 30, 2008.

ICLS – Included in June 30, 2008 Certification

Company Name As Listed by USAC	State	Study Area Code
Highland Cellular, LLC ¹	West Virginia	209003
American Cellular Corporation ²	West Virginia	209011

On August 20, 2008 in PSC Case No. 08-0620-T-PC, an administrative law judge of the West Virginia Public Service Commission issued a recommended decision that became a final order on August

¹ In October 2006 Highland Cellular was purchased by American Cellular Corporation a wholly-owned subsidiary of Dobson Communications Corporation. On November 15, 2007, Dobson Communications Corporation became a wholly-owned subsidiary of AT&T Inc. Highland Cellular remained a subsidiary of Dobson Communications Corporation following the merger with AT&T, but was converted to a limited liability company. Since November 15, 2007, Highland Cellular LLC has been managed by AT&T Mobility Corporation.

² On November 15, 2007, Dobson Communications Corporation became a wholly-owned subsidiary of AT&T Inc. American Cellular Corporation remained a subsidiary of Dobson Communications Corporation following the merger, but was converted to a limited liability company. Since November 15, 2007, American Cellular LLC has been managed by AT&T Mobility Corporation.

30, 2008, approving the transfer of ETC status of Highland Cellular, Inc., American Cellular Corporation, and Easterbrooke Corporation to New Cingular Wireless PCS, LLC, dba AT&T Mobility.

While AT&T Mobility does not know why USAC has failed to issue it ICLS payments in 2009 for West Virginia, perhaps USAC was unaware that, at the time of the submission of the ICLS certification for 2008 – 2009, Highland Cellular and American Cellular were already under the control of AT&T Mobility LLC, which is managed by AT&T Mobility Corporation, and, thus, AT&T Mobility was authorized to certify on behalf of these wholly owned affiliates. USAC also may have been unaware of the West Virginia Commission's approval to transfer the ETC status of these affiliates to New Cingular Wireless PCS, LLC. While AT&T Mobility continues to believe that its timely filed ICLS certification remains valid and no waiver of the Commission's filing deadline is necessary, out of an abundance of caution, AT&T Mobility is submitting this certification on behalf of the entity that Highland Cellular and American Cellular Corporation merged into, New Cingular Wireless PCS, LLC dba AT&T Mobility.

I am authorized to make this certification on behalf of the entity listed below. AT&T Mobility will only use ICLS support for the provision, maintenance and upgrading of facilities and services for which the support is intended.

Company Name	State	Study Area Code
New Cingular Wireless PCS, LLC	West Virginia	209012

Signed, 
(Signature of Authorized Representative)

Date: March 31, 2009

Erika K. Thompson
(Printed Name of Authorized Representative)

Vice-President/General Manager Virginia/West Virginia
(Title of Authorized Representative)

Carrier's Name: AT&T Mobility
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