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December 10, 2010

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

Re: Petition of AT&T Mobility LLC for Designation as an ETC and Transfer of the Alltel Pine Ridge Reservation ETC Designation; WC Dkt. 09-197

Dear Ms. Dortch:

On December 8, 2010, Joan Marsh, Cathy Carpino, and the undersigned of AT&T met with Trent Harkrader, Vickie Robinson, Divya Shenoy, and Joe Cavender of the Wireline Competition Bureau (Bureau), Kathy Harris of the Wireless Bureau, and Geoff Blackwell and Irene Flannery of the Office of Native Affairs and Policy.

During the meeting, AT&T strongly urged the FCC to take immediate action on the above named petition (Petition) filed on July 30, 2010. AT&T expressed concern that continued Bureau delay could jeopardize the company's ability to meet the service upgrade schedules and low cost service offerings to which it is committed. AT&T emphasized that, beginning on the date of the Commission's order approving Verizon Wireless's transfer of certain licenses and authorizations to AT&T, it has provided uninterrupted low cost service to all wireless subscribers on the Pine Ridge Reservation (Reservation). The company is upgrading the facilities located on the Reservation and is, from a network perspective, on track to transition to 3G service throughout the area. AT&T explained, however, that to make the transition to 3G as smooth as possible for current subscribers, AT&T is undertaking a major consumer education campaign that includes allowing every subscriber on the Reservation to select a new 3G handset well in advance of the cutover date and at no cost. Subscribers are already anticipating taking advantage of the new network capabilities; however, if our petition is not granted, the low cost service plans, including the \$1.00/month Enhanced Lifeline rate, will be discontinued after June 22, 2011.

While members of the Office of Native Affairs noted that the Tate Woglaka Service Agreement remains in dispute, AT&T pointed out that when the full Commission granted AT&T's and Verizon Wireless's transfer request (which included the licenses and the wireless network serving the Reservation), it determined that 1) the contractual dispute was not relevant to the matters before it, and 2) "it is clear that the wireless service provided to tribal members on the Reservation at prices supported by the Commission's universal service funds is *essential*." (*See Applications of AT&T Inc. and Cellco Partnership d/b/a Verizon Wireless For Consent To Assign or Transfer Control of Licenses and Authorizations and Modify a Spectrum Leasing Arrangement, WT Docket, MO&O, FCC 10-116, June 22, 2010 (emphasis added)*). Since AT&T has expressly undertaken on a going forward basis the rights and obligations of the Service Agreement, the Bureau clearly has the authority to grant AT&T's Petition.

On an administrative matter, AT&T Mobility included in its Petition a list of wire centers covered by the Petition.¹ In that exhibit, AT&T Mobility listed three wire centers, all associated with one incumbent local exchange carrier (ILEC), Golden West Telecommunications. AT&T Mobility provided this information based on information that it, in turn, had received from former Alltel personnel who managed Alltel's ETC program.

Based on AT&T Mobility's research, it appears that the wire center information provided by the former Alltel personnel was incomplete. In addition to the three wire centers listed in Exhibit C, there are three other wire centers that cover, in part, the Reservation. Like Alltel before us, we have no subscribers in two of the three wire centers² that are partially on the Reservation. The third wire center³ does have subscribers but it happens to be a wire center that straddles two states – South Dakota and Nebraska – and it appears that the ILEC for that wire center associates all of the lines for that wire center with its Nebraska filings. These circumstances (no subscribers in two of the wire centers and the ILEC treats its South Dakota lines – if it has any – in the third wire center as Nebraska lines for its USAC filings) may explain why former Alltel personnel neglected to mention these wire centers to AT&T Mobility's personnel. Regardless of the cause of the former Alltel personnel's oversight, we provide this update so that the Bureau will have complete information when it grants our Petition. As we stated in the Petition, we do not seek to expand the area of the Alltel Pine Ridge Reservation ETC Designation. Rather, providing this additional information will ensure that AT&T Mobility's designation will mirror the designation that the Commission originally awarded to Western Wireless in 2001.

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions concerning this filing, please do not hesitate to contact me at 202-457-2041.

Sincerely,

/s/ Mary L. Henze

Mary L. Henze

cc: T. Harkrader
G. Blackwell
V. Robinson
I. Flannery
K. Harris
D. Shenoy
J. Cavender

¹ See Petition at Exh. C.

² Study Area Code 391659: Interior (INTRSDXA) and Martin (MARTSDXA), both served by Golden West Telecommunications.

³ Study Area Code 371577: Gordon (GRDNNERQ), served by Great Plains Communications.