

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 )  
Connect America Fund ) WC Docket No. 10-90

**AT&T MOBILITY LLC’S ELIGIBLE TELECOMMUNICATIONS  
CARRIER ANNUAL REPORT AND CERTIFICATION IN ALABAMA  
(SAC 259908) IN COMPLIANCE WITH 47 C.F.R. § 54.313(a)**

**I. INTRODUCTION**

In accordance with the standards and requirements established by the Federal Communications Commission (“Commission”), AT&T Mobility LLC (“AT&T Mobility” or “Company”) submits this Annual Report and Certification for its study area code (SAC 259908 ) in the State of Alabama, and respectfully requests that the Commission certify its continued eligibility to receive high-cost support from the federal universal service fund for calendar year 2013.

**II. AT&T MOBILITY’S ANNUAL REPORTING IN ACCORDANCE WITH SECTION 54.313(a)**

Section 54.313(a) of the Commission’s Rules requires each eligible telecommunications carrier (“ETC”) receiving high-cost support to annually report certain information no later than April 1st of each calendar year.<sup>1</sup> AT&T Mobility provides this report for calendar year 2011.

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<sup>1</sup> *But see Connect America Fund et al.*, WC Docket Nos. 10-90 *et al.*, Order, DA 12-147 (rel. Feb. 3, 2012) (“*ETC Reporting Rule Clarification Order*”) (clarifying that, in 2012, section 54.313(a)(1)-(6) of the Commission’s new ETC reporting rule applies only to Commission-designated ETCs).

A. **AT&T Mobility’s Progress Report On Its Service Improvement Plan**

As clarified in the *ETC Reporting Rule Clarification Order*, for the April 1, 2012 filing, section 54.313(a)(1) of the Commission’s rules requires a federally-designated ETC receiving high-cost support to provide a progress report on its previously filed five (5) year Service Improvement Plan.<sup>2</sup>

The progress report must include maps detailing the Company’s progress toward meeting its planned targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage or capacity, and an explanation regarding any network improvement plan targets that have not been fulfilled in the prior year. AT&T Mobility is providing as **Confidential Exhibit A-1** its progress report on the previously filed Service Improvement Plan for calendar year 2011, along with a slightly revised Service Improvement Plan for calendar year 2012 (**Confidential Exhibit A-2**), which is based on the amount of federal high-cost funding that AT&T Mobility is currently projecting that it will receive. Service Improvement Plans are subject to change over time for various reasons, including, but not limited to, changes in consumer demand and projected costs, projected universal service support amounts and the amount of universal service support actually received, and delays to projects caused by zoning/permitting, lease negotiations, and the back-order of equipment. AT&T Mobility is also including as **Confidential Exhibit A-3** a map depicting cell sites added in 2011 and the increased coverage after the Service Improvements were made in 2011.

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<sup>2</sup> *Id.* at ¶ 6.

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**B. AT&T Mobility Network Outages In The Alabama Designated Area**

Section 54.313(a)(2) of the Commission’s rules requires an ETC to annually report network outages within the area in which the Commission designated it an ETC (i.e., the “Designated Area”). The rule specifically requires:

Detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) [a]t least ten percent of the end users served in a designated service area; or (ii) [a] 911 special facility, as defined in 47 C.F.R. 4.5(e). (iii) Specifically, the eligible telecommunications carrier’s annual report must include information detailing: (A) [t]he date and time of onset of the outage; (B) [a] brief description of the outage and its resolution; (c) [t]he particular services affected; (D) [t]he geographic areas affected by the outage; (E) [s]teps taken to prevent a similar situation in the future; and (F) [t]he number of customers affected.

AT&T Mobility provides as **Confidential Exhibit B** the qualified outages for calendar year 2011. The information provided is for the entire state of Alabama, not just the Designated Area.

**C. AT&T Mobility’s Unfulfilled Requests For Service**

Section 54.313(a)(3) of the Commission’s rules requires an ETC to report the number of requests for service from potential customers within the ETC’s designated service area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. In response to a request for service, consistent with the prior Commission rule that was in effect in 2011,<sup>3</sup>

AT&T Mobility takes the following steps:

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<sup>3</sup> See 47 C.F.R. § 54.202(a)(1) (2011).

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- 1) AT&T Mobility will provide service on a timely basis to requesting customers within AT&T Mobility’s service area where AT&T Mobility’s network already passes the potential customer’s premises;
- 2) If a customer cannot be served by AT&T Mobility’s existing facilities, AT&T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by:
  - a) Modifying or replacing the requesting customer’s equipment;
  - b) Deploying a roof-mounted antenna or other equipment;
  - c) Adjusting the nearest cell tower;
  - d) Adjusting network or customer facilities
  - e) Reselling services from another carrier’s facilities to provide service; or
  - f) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

If, after these steps, the customer cannot be served, AT&T Mobility will notify the customer and provide the Commission with an annual report of how many requests for service could not be filled. In 2011 AT&T Mobility had one (1) unfulfilled service request.

**D. AT&T Mobility’s Complaints Per 1,000 Handsets Or Lines**

Section 54.313(a)(4) of the Commission’s rules requires an ETC to report for the prior calendar year, the number of complaints per 1,000 connections. AT&T Mobility identified the number of complaints received from the Public Service Commission, the Commission, the Alabama Attorney General, Consumer Advocate Division, and the Better Business Bureau (BBB) per 1,000 handsets<sup>4</sup> during the 2011 calendar year as .332 complaints per 1,000 handsets. AT&T Mobility believes that this information best represents customer complaints, which is the requirement. Calls into customer care can

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<sup>4</sup> Previous rule 54.209(a)(4) required ETCs to report this information by “1,000 handsets or lines.” See 47 C.F.R. § 54.209(a)(4) (2011).

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be for a large variety of reasons and do not necessarily constitute a complaint, but could instead be an inquiry about service, a question about a bill or so forth. However, customers that send a letter to a state or federal agency, the BBB or an AT&T executive more often than not have a complaint and are not contacting the company with an inquiry.

**E. AT&T Mobility’s Certification Regarding Applicable Service Quality Standards And Consumer Protection Rules**

Section 54.313(a)(5) of the Commission’s rules requires an ETC to certify it is complying with applicable service quality standards and consumer protection rules. AT&T Mobility’s compliance with the terms and conditions of the CTIA Consumer Code for Wireless Service meets this requirement. AT&T Mobility certifies that it has complied and will continue to comply with the principles set forth therein.

**F. AT&T Mobility’s Certification Regarding Its Ability To Function In Emergency Situations**

Section 54.313(a)(6) of the Commission’s rules requires an ETC to certify an ability to function in emergency situations as set forth in section 54.202(a)(2) of the Commission’s rules. The standards set forth in section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities and a capability to manage traffic spikes resulting from emergency situations. AT&T Mobility has in place emergency operation procedures so that it can function in an emergency. Backup power is provided at switch locations and cell sites through a combination of batteries, portable and permanent generators. AT&T Mobility also has mobile switches and portable COWs (Cells on Wheels) that it can deploy in the event of an emergency. Based on the

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foregoing, AT&T Mobility certifies it is able to function in emergency situations as set forth in section 54.202(a)(2).

**G. AT&T Mobility’s Price Offerings**

Section 54.313(a)(7) of the Commission’s rules requires an ETC to report its price offerings in compliance with the requirements established by the Commission’s Wireline Competition Bureau. To date, the Wireline Competition Bureau has not provided ETCs with guidance on what format ETCs should use to report this information. More importantly, it does not appear that the Commission has received Office of Management and Budget (“OMB”) approval to collect this information from ETCs. While the Bureaus failed to mention the status of this new reporting requirement in their *ETC Reporting Rule Clarification Order*, AT&T Mobility assumes that this omission was inadvertent and the Bureaus did not intend for any ETC to submit pricing information to the Commission in the April 1, 2012 annual filing.

**H. AT&T Mobility’s Ownership Information**

Section 54.313(a)(8) of the Commission’s rules requires an ETC to provide information regarding its holding company, operating companies, affiliates, and any branding (a “dba,” or “doing-business-as company” or brand designation), as well as its universal service identifiers for each listed entity by Study Area Codes. In their *ETC Reporting Rule Clarification Order*, the Bureaus clarified that they will provide affected ETCs sufficient time after OMB approval is received to file the required information.<sup>5</sup>

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<sup>5</sup> *ETC Reporting Rule Clarification Order* at ¶ 12.

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AT&T Mobility will comply with this new Commission reporting requirement when it is instructed to do so.

**I. AT&T Mobility's Tribal Engagement**

Section 54.313(a)(9) of the Commission's rules require an ETC, if it provides services to Tribal lands, to provide documentation and information demonstrating that the ETC had certain discussions with Tribal governments. This is another new reporting rule that the Bureaus clarified will not be effective until April 1, 2013.<sup>6</sup>

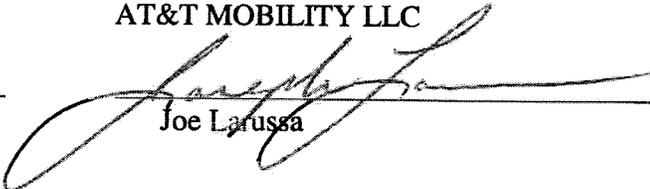
**III. CONCLUSION**

Based on the foregoing information, AT&T Mobility respectfully requests the Commission to certify its eligibility to receive federal universal service support for calendar year 201~~2~~<sup>3cc</sup> in accordance with 47 C.F.R. §§ 54.313 and 54.314.

Dated: \_\_\_\_\_

3/16/12

AT&T MOBILITY LLC

  
\_\_\_\_\_  
Joe Larussa

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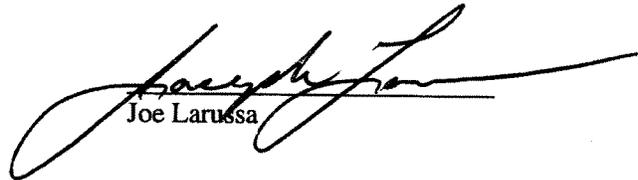
<sup>6</sup> *Id.* at ¶ 11.

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**CERTIFICATION**

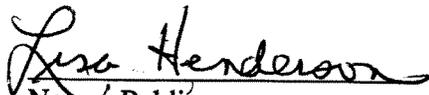
The Undersigned, Joe Larussa, does hereby certify as follows:

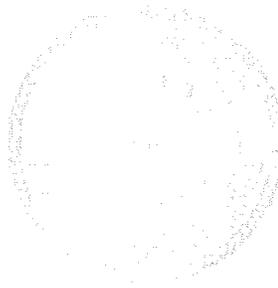
1. I currently serve as Vice President/General Manager – Gulf States for AT&T Mobility Corporation, the manager for AT&T Mobility LLC. In this position I am personally familiar with the federal high-cost universal service support that AT&T Mobility received, and how AT&T Mobility uses these funds.
2. This certification is submitted in support of AT&T Mobility's Annual Report and Certification in compliance with 47 C.F.R. §54.313.
3. AT&T Mobility's Study Area Code for the supported area is 259908.
4. AT&T Mobility hereby certifies that it utilized in 2011, and will utilize in 2012, federal high-cost universal service support for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 254(e) of the Communications Act of 1934, as amended.
5. I have reviewed the ETC Annual Report and Certification and the facts stated therein are true and correct to the best of my knowledge, information and belief.

  
Joe Larussa

Subscribed and sworn to me  
this 16<sup>th</sup> day of March, 2012.

(NOTARY SEAL)

  
Notary Public  
Lisa Henderson



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# **EXHIBIT A-1**

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# **EXHIBIT A-2**

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# **EXHIBIT A-3**

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# **EXHIBIT B**

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