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Cathy Carpino
General Attorney

AT&T Services, Inc.
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July 3, 2012

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

FILED/ACCEPTED
JUL - 3 2012
Federal Communications Commission
Office of the Secretary

**Re: AT&T Mobility's Annual Eligible Telecommunications Carrier Reports,
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

AT&T Inc. (AT&T) on behalf of its AT&T Mobility state-designated eligible telecommunications carrier (ETC) affiliates hereby re-files information required by the Wireline Competition and Wireless Telecommunications Bureaus' February 3, 2012, Order¹ and the Wireline Competition Bureau's May 8, 2012 Public Notice.² Today's filing is identical in all material respects to its June 28, 2012 filing except that, with this filing, AT&T is redacting certain complaint data contained in Exhibit A. In its June 28, 2012 filing, AT&T inadvertently included confidential information in Exhibit A in the redacted filing. With today's filing, we are redacting that data. We hereby withdraw AT&T's redacted filing made in this docket on June 28, 2012 and ask that the Commission not make that filing publicly available. Additionally, we are supplementing the confidential information that we filed in this docket on June 28, 2012. Specifically, we are providing the more granular complaint data that AT&T Mobility's affiliate in Alaska submits to the Alaska Regulatory Commission.

As AT&T explained in its June 28, 2012 filing, it hereby submits responsive information that was filed earlier this year or will be filed later this year with state commissions. Depending on each state's requirements, AT&T is providing some or all of the information required by new Commission rule 47 C.F.R. § 54.313(a)(2)-(6) for the following states and territory: Alaska, Arkansas, Idaho, Kentucky, Michigan, Mississippi, North Dakota, Oregon, Puerto Rico, Texas, Washington, and West Virginia. We previously requested confidential treatment for all of the network outage reports that we filed on June 28, 2012, and we attach that request to today's

¹ *Connect America Fund, WC Docket No. 10-90, et al.*, Order, DA 12-147, ¶ 10 (rel. Feb. 3, 2012).

² *Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission's Rules*, WC Docket Nos. 10-90, *et al.*, Public Notice, DA 12-279 (rel. May 8, 2012).

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filing. Additionally, we attach a separate request specific to the complaint data contained in Confidential Exhibit A. Finally, we include the cover sheet of the June 28, 2012 redacted filing, demonstrating that AT&T timely submitted this information to the Commission.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Cathy Carpino
Cathy Carpino

Attachments



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Marlene H. Dortch
Secretary
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Washington, DC 20554

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JUL - 3 2012
Federal Communications Commission
Office of the Secretary

Re: REQUEST FOR CONFIDENTIAL TREATMENT
Connect America Fund, WC Docket 10-90
**AT&T Mobility, LLC (SAC 619004) Eligible Telecommunications
Carrier Annual Report and Certification in Compliance with 47
C.F.R. § 54.313(a)**

Pursuant to the Commission’s decision in *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, GC Docket No. 96-55 (FCC 98-184), released Aug. 4, 1998 (“*Confidential Information Order*”) and in accordance with the Freedom of Information Act (“FOIA”) and the Commission’s Rules related to public information and inspection of records, e.g. 47 C.F.R. §§ 0.457 and 0.459, AT&T Inc. (“AT&T”), on behalf of itself and its affiliate AT&T Mobility LLC (“AT&T Mobility”), hereby submits this request for confidential treatment of certain information submitted to the Commission in its Eligible Telecommunications Carrier Annual Report and Certification in Compliance with 47 C.F.R. § 54.313(a) (“ETC Annual Report”). *See also Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission’s Rules*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51, CC Docket Nos. 01-92, and 96-45; WT Docket No. 10-208, Public Notice, DA 12-729 (rel. May 8, 2012). This request applies to the complaint data contained in attached Confidential Exhibit A. On June 28, 2012, AT&T filed confidential information with its ETC Annual Report. With this filing, AT&T is supplementing the confidential information to provide the more granular complaint data that it filed with the Alaska Regulatory Commission earlier this year.

Statement pursuant to 47 C.F.R. § 0.459(b)

(1) Identification of the specific information for which confidential treatment is sought.

Confidential Exhibit A contains certain complaint data required by 47 C.F.R. § 54.313(a)(4). Unlike other complaint data that AT&T submitted to the Commission in its June 28, 2012 Annual Report, AT&T Mobility’s affiliate in Alaska is required to provide more granular complaint information. Specifically, AT&T Mobility’s Alaska affiliate is required to provide the actual number of customer complaints by ILEC study area code

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(SAC) as well as the percentage of customers that actual number represents. These two data points enable competitors to determine this affiliate's number of subscribers by ILEC SAC. AT&T Mobility is not required to publicly report this granular of information regarding complaints in other venues and the Alaska Commission has granted AT&T Mobility's requests to file this data confidentially. Disclosure of this information would be detrimental to AT&T Mobility because it contains data that is not otherwise available to competitors and the public, and which would be used to competitively disadvantage AT&T Mobility.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The information is being provided to the Commission in response to Commission Rule 47 C.F.R. § 54.313(a)(4) as well as the Commission's *ETC Designation Order*, 20 FCC Rcd 6371 (2005) and *USF/ICC Transformation Order*, 26 FCC Rcd 17663 (2011).

(4) Explanation of the degree to which the information concerns a service that is subject to competition; and

The information being provided to the Commission is relevant to the various interstate and intrastate telecommunications services provided by AT&T Mobility in competition with other CMRS and wireline providers. Telecommunications, in particular, mobile telecommunications, is a highly competitive industry, and AT&T's mobile services are subject to significant competition throughout the country. The presence of such competition and the likelihood of competitive injury threatened by release of the information provided to the Commission by AT&T should compel the Commission to withhold the information from public disclosure. *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1152 (D.C. Cir. 1987); *Frazer v. U.S. Forest Service*, 97 F.3d 367, 371 (9th Cir. 1996); *Gulf & Western Indus. v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

(5) Explanation of how disclosure of the information could result in substantial competitive harm.

Exemption 4 requires a federal agency to withhold from public disclosure confidential or privileged commercial and financial information of a person unless there is an overriding public interest requiring disclosure, and the Commission has a longstanding policy of protecting the confidential commercial information of its regulatees under FOIA Exemption 4.

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Two lines of cases have evolved for determining whether agency records fall within Exemption 4. Under *Critical Mass*, commercial information that is voluntarily submitted to the Commission must be withheld from public disclosure if such information is not customarily disclosed to the public by the submitter.¹ For materials not subject to *Critical Mass*, *National Parks* establishes a two part test for determining if information qualifies for withholding under Exemption 4.² The first prong asks whether disclosing the information would impair the government's ability to obtain necessary information in the future. The second prong asks whether the competitive position of the person from whom the information was obtained would be impaired or substantially harmed. If the information meets the requirements of either prong, it is exempted from disclosure under Exemption 4. Whether under *Critical Mass* or *National Parks*, the information provided by AT&T falls within Exemption 4.

The information being provided to the Commission in response to the Commission's rules is not customarily released to the public, is maintained on a confidential basis, and is not ordinarily disclosed to parties outside the company. Disclosure of this information would subject AT&T to substantial competitive harm.

Competitors could use the confidential information to assist in targeting their service offerings and enhancing their competitive positions, to the detriment of the competitive position of AT&T Mobility. *See, e.g., GC Micro Corp. v. Defense Logistics Agency*, 33 F.3d 1109 (9th Cir. 1994).

- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure; and**
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

This information has been maintained on a confidential basis within AT&T and would not ordinarily be disclosed to parties outside the company. Company practices instruct employees not to disclose such information outside the company and restrict such access to this information pursuant to a nondisclosure agreement.

- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.**

The material must be kept confidential for an indefinite period. Confidential treatment must be afforded this information as long as it would provide a basis for AT&T

¹ *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

² *National Parks & Conservation Assoc. v. Morton*, 498 F.2d 765 D.C. Cir. (1974) ("*National Parks*").

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Mobility’s competitors to gain insight into its business operations. AT&T cannot determine at this time any date on which the information would become “stale” for such a purpose.

Conclusion

For all the foregoing reasons AT&T requests that the Commission withhold from public disclosure pursuant to section 0.459 of the Commission’s Rules the complaint data contained in Confidential Exhibit A. If the Commission is unable for any reason to keep this information confidential, AT&T respectfully requests that the Commission return the information to AT&T pursuant to section 0.459(e) of the Rules.

Sincerely,

/s/ Cathy Carpino

Cathy Carpino

Attachments

CERTIFICATE OF SERVICE

I, Toyin Harris, hereby certify that on this 3rd day of July 2012, a copy of the foregoing “AT&T Mobility Annual Eligible Telecommunications Carrier High Cost Filing Report” by AT&T, Inc. for WC Docket No. 10-90 was served hand delivered, to the party listed below:

Universal Service Administrative Company
Attn: David Capozzi, Acting General Counsel
2000 L Street, NW
Suite 200
Washington, DC 20036

/s/ Toyin Harris

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Cathy Carpino
General Attorney

AT&T Services, Inc.
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Washington, D.C. 20036
Phone (202)457-3046
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E-mail: cathy.carpino@att.com

FILED/ACCEPTED

June 28, 2012

JUN 28 2012

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

Federal Communications Commission
Office of the Secretary

**Re: AT&T Mobility's Annual Eligible Telecommunications Carrier Reports,
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

In accordance with the Wireline Competition and Wireless Telecommunications Bureaus' February 3, 2012, Order¹ and the Wireline Competition Bureau's May 8, 2012 Public Notice,² AT&T Inc. (AT&T), on behalf of its AT&T Mobility state-designated eligible telecommunications carrier (ETC) affiliates, hereby submits responsive information that was filed earlier this year or will be filed later this year with state commissions. Depending on each state's requirements, AT&T is providing some or all of the information required by new Commission rule 47 C.F.R. § 54.313(a)(2)-(6) for the following states and territory: Alaska, Arkansas, Idaho, Kentucky, Michigan, Mississippi, North Dakota, Oregon, Puerto Rico, Texas, Washington, and West Virginia. We are requesting confidential treatment for all of the network outage reports that we are filing today.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Cathy Carpino
Cathy Carpino

Attachments

¹ *Connect America Fund*, WC Docket No. 10-90, *et al.*, Order, DA 12-147, ¶ 10 (rel. Feb. 3, 2012).

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June 28, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

FILED/ACCEPTED

JUL - 3 2012

Federal Communications Commission
Office of the Secretary

Re: **REQUEST FOR CONFIDENTIAL TREATMENT**
Connect America Fund, WC Docket 10-90
**AT&T Mobility, LLC (SACs 619004; 409004; 479006; 269905;
319026; 539010; 639005; and 209012) Eligible Telecommunications
Carrier Annual Report and Certification in Compliance with 47
C.F.R. § 54.313(a)**

Pursuant to the Commission's decision in *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, GC Docket No. 96-55 (FCC 98-184), released Aug. 4, 1998 ("*Confidential Information Order*") and in accordance with the Freedom of Information Act ("FOIA") and the Commission's Rules related to public information and inspection of records, e.g. 47 C.F.R. §§ 0.457 and 0.459, AT&T Inc. ("AT&T"), on behalf of itself and its affiliate AT&T Mobility LLC ("AT&T Mobility"), hereby submits this request for confidential treatment of certain information submitted to the Commission in its Eligible Telecommunications Carrier Annual Report and Certification in Compliance with 47 C.F.R. § 54.313(a) ("Annual Reporting Requirements for High-Cost Recipients"). See also *Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission's Rules*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51, CC Docket Nos. 01-92, and 96-45; WT Docket No. 10-208, Public Notice, DA 12-729 (rel. May 8, 2012). This request applies to the outage reports included in Exhibits A through H submitted herewith to the Commission.

Statement pursuant to 47 C.F.R. § 0.459(b)

- (1) **Identification of the specific information for which confidential treatment is sought.**

Included in Confidential Exhibits A through H is highly sensitive network outage information required by 47 C.F.R. § 54.313(a)(2). Commission Rule 54.313(a)(2) was modeled on the outage reporting requirements in 47 C.F.R. Part 4. When it adopted the Part 4 reporting requirements, the Commission found that such data present national security and competitive concerns and should be deemed confidential when filed with the Commission. *New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of

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Proposed Rulemaking, FCC 04-188, ¶ 3 (rel. August 19, 2004) (“This data, though useful for the analysis of past and current outages in order to increase the reliability and security of telecommunications networks in the future, could be used by hostile parties to attack those networks, which are part of our Nation’s critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity. We therefore will treat the information that will be provided as confidential.”) The outage information in Confidential Exhibits A through H is entitled to be treated as confidential for these same reasons.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The information is being provided to the Commission in response to Commission Rule 47 C.F.R. § 54.313(a)(2) as well as the Commission’s *ETC Designation Order*, 20 FCC Rcd 6371 (2005) and *USF/ICC Transformation Order*, 26 FCC Rcd 17663 (2011).

(4) Explanation of the degree to which the information concerns a service that is subject to competition; and

The information being provided to the Commission is relevant to the various interstate and intrastate telecommunications services provided by AT&T Mobility in competition with other CMRS and wireline providers. Telecommunications, in particular, mobile telecommunications, is a highly competitive industry, and AT&T’s mobile services are subject to significant competition throughout the country. The presence of such competition and the likelihood of competitive injury threatened by release of the information provided to the Commission by AT&T should compel the Commission to withhold the information from public disclosure. *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1152 (D.C. Cir. 1987); *Frazee v. U.S. Forest Service*, 97 F.3d 367, 371 (9th Cir. 1996); *Gulf & Western Indus. v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).

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Exemption 4 requires a federal agency to withhold from public disclosure confidential or privileged commercial and financial information of a person unless there is an overriding public interest requiring disclosure, and the Commission has a longstanding policy of protecting the confidential commercial information of its regulatees under FOIA Exemption 4.

Two lines of cases have evolved for determining whether agency records fall within Exemption 4. Under *Critical Mass*, commercial information that is voluntarily submitted

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The information being provided to the Commission in response to the Commission's rules is not customarily released to the public, is maintained on a confidential basis, and is not ordinarily disclosed to parties outside the company. Disclosure of this information would subject AT&T to substantial competitive harm.

Competitors could use the confidential information to assist in targeting their service offerings and enhancing their competitive positions, to the detriment of the competitive position of AT&T Mobility. *See, e.g., GC Micro Corp. v. Defense Logistics Agency*, 33 F.3d 1109 (9th Cir. 1994).

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure; and**
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

This information has been maintained on a confidential basis within AT&T and would not ordinarily be disclosed to parties outside the company. Company practices instruct employees not to disclose such information outside the company and restrict such access to this information pursuant to a nondisclosure agreement.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.**

The material must be kept confidential for an indefinite period. Confidential treatment must be afforded this information as long as it would provide a basis for AT&T Mobility's competitors to gain insight into its business operations. AT&T cannot

¹ *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

² *National Parks & Conservation Assoc. v. Morton*, 498 F.2d 765 D.C. Cir. (1974) ("*National Parks*").

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determine at this time any date on which the information would become “stale” for such a purpose.

Conclusion

For all the foregoing reasons AT&T requests that the Commission withhold from public disclosure pursuant to section 0.459 of the Commission’s Rules the outage information contained in Confidential Exhibits A through H. If the Commission is unable for any reason to keep this information confidential, AT&T respectfully requests that the Commission return the information to AT&T pursuant to section 0.459(e) of the Rules.

Sincerely,

/s/ Cathy Carpino

Cathy Carpino

Attachments

EXHIBIT A

Alaska 2012 Filings

(Annual Recertification)

This exhibit includes extracts from a report filed with the Regulatory Commission of Alaska covering the calendar year of 2011.

Specifically the exhibit includes the following pages

Page 2-7 54.313(a)(2) Federal Outages

Federal Outages are attached as Confidential Exhibit 6 to the Annual Recertification

Page 8 54.313(a)(3) Unfulfilled Service Extension Requests

U-SERs are included in the Annual Recertification Pleading

Page 9 54.313(a)(4) Complaints per 1000 handsets/subscribers

Complaints per 1000 are attached as Confidential Exhibit 5 to the Annual Recertification

Page 10-11 54.313(a)(5) Consumer Protection (i.e., CTIA Certification)

CTIA certification is attached as Exhibit 4 to the Annual Recertification

Page 10-11 54.313(a)(6) Emergency Preparedness Plans

Emergency Preparedness Plan is certified in Exhibit 4 to the Annual Recertification

Alaska 2012 Filings

(Annual Recertification)

	<p>13. <u>Outage Reports.</u> 3 AAC 53.460(a)(7) requires copies of any outage reports mandated by the commission or the FCC. Attached as Confidential Exhibit 6 is information that was filed with the FCC pursuant to 47 C.F.R. Part 4.</p>	
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Note: The RCA outage reporting requirements are slightly different from the FCC's outage reporting requirements in 47 C.F.R. § 54.313(a)(2).

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CONFIDENTIAL OUTAGE REPORT

Alaska 2012 Filings
(Annual Recertification)

<p>MICHAEL MAXWELL LAWYER 27 WEST 9TH AVENUE, SUITE 200 ANCHORAGE, ALASKA 99501 TEL: 276-4311 FAX: 907-277-8235</p>	<p>9. <u>Unfulfilled Service Request.</u> 3 AAC 53.460(a)(2) requires that the carrier certify that it provided service throughout its ETC service area to all customers requesting service except as detailed in 3 AAC 53.460(a)(3). AT&T Mobility provides this certification in the affidavit of Michael Maxwell attached as Exhibit 4. AT&T Mobility had one unfulfilled service extension request in 2011.</p>
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Redacted Exhibit 5 - AT&T Mobility Annual Report

AT&T Mobility 2011 Percentage of Complaints by ETC Study Area

SAC Code	Study Area Name	Percentage of Customers filing FCC Complaints	Percentage of Customer Filing AK Commission Complaints	Actual Number of Complaints
613000	ACS OF ANCHORAGE			8
613006	COPPER VALLEY TEL			0
613008	ACS-FAIRBANKS, INC.			0
613010	ACS-N GLACIER STATE			3
613012	ACS-AK JUNEAU			0
613013	KETCHIKAN PUBLIC UT			0
613015	MATANUSKA TEL ASSOC			6
613017	ALASKA TEL CO			0
613022	ACS-AK GREATLAND			0

Alaska 2012 Filings

(Annual Recertification)

	<p>11. <u>Consumer Protection.</u> 3 AAC 53.460(a)(5) requires a certification that the carrier is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450. This certification is contained in the affidavit of Michael Maxwell attached as Exhibit 4.</p>	
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	<p>12. <u>Functionality in Emergency Situations.</u> 3 AAC 53.460(a)(6) requires a certification that the common carrier complies with requirements set out in 3 AAC 53.410(a)(12) regarding functionality in emergency situations. This certification is contained in the affidavit of Michael Maxwell attached as Exhibit 4.</p>	
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Alaska 2012 Filings (Annual Recertification)

Exhibit 4 - AT&T Mobility Annual Report

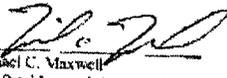
AFFIDAVIT REGARDING THE USE OF FEDERAL HIGH-COST SUPPORT FOR THE 2012
CALENDAR YEAR

AT&T MOBILITY (SAC 619004)

STATE OF OREGON)
)
COUNTY OF CLACKAMAS)

The undersigned, Michael C. Maxwell, does hereby certify as follows:

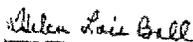
1. I am authorized to make this certification on behalf of New Cingular New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility, formerly Dobson Cellular Systems of Alaska, LLC d/b/a AT&T Mobility ("AT&T Mobility").
2. On August 16, 2006, Dobson Cellular Systems of Alaska, LLC was designated as an eligible telecommunications carrier ("ETC") by the Regulatory Commission of Alaska ("RCA") for certain areas within the State of Alaska, thus becoming eligible to receive federal high-cost support.
3. AT&T Mobility certifies that it provided service throughout its ETC serving area to all customers requesting service, whenever possible. Any instances where requested service was not provided have been detailed in AT&T Mobility's Annual Report, as required by 3 AAC 53.460(a)(3).
4. AT&T Mobility certifies that it is in compliance with applicable consumer protection and service quality standards set out in 3 AAC 53.450.
5. AT&T Mobility certifies that it complies with requirements set out in 3 AAC 53.410(a) (12) regarding functionality in emergency situations.
6. AT&T Mobility certifies that it complies with 3 AAC 53.410 (a) (14) by offering one or more calling plans comparable to those of the incumbent local exchange carrier¹, including a calling plan offering at least 500 free minutes of local usage per month.

By: 
Michael C. Maxwell
Vice President and General Manager

¹ Calling plans cannot be compared solely on price, but must also consider calling scope and the additional features and functionalities offered. AT&T Mobility's calling plans offer consumers numerous benefits including the inherent mobile nature of wireless service. Further, AT&T Mobility's "local" calling area is generally the entire United States.

Exhibit 4 - AT&T Mobility Annual Report
Page 1 of 2

Subscribed and sworn to before me this 19th day of March, 2012.

 Notary Public

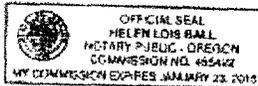


EXHIBIT B

Arkansas 2012 Filings

(Annual Recertification)

This exhibit includes information to be filed with the Arkansas Public Service Commission on or before 7/1/12 covering calendar year 2011.

Specifically the exhibit includes the following pages or text:

- | | |
|----------|--|
| Page 2-3 | 54.313(a)(2) Federal Outages |
| | Federal Outages are attached as Confidential Exhibit C to the Annual Recertification |
| Page 4 | 54.313(a)(3) Unfulfilled Service Extension Requests |
| | U-SERs are certified in the Recertification Pleading |
| Page 5 | 54.313(a)(4) Complaints per 1000 handsets/subscribers |
| | Complaints per 1000 is certified in the Recertification Pleading |
| Page 6 | 54.313(a)(5) Consumer Protection (i.e., CTIA Certification) |
| | CTIA certification is certified in the Recertification Pleading |
| Page 7 | 54.313(a)(6) Emergency Preparedness Plans |
| | Emergency Preparedness Plan is certified in the Recertification Pleading |

Arkansas 2012 Filings

(Annual Recertification)

V. AT&T MOBILITY NETWORK OUTAGES IN THE ARKANSAS DESIGNATION

The Commission's requirements in Docket No. 06-050-R, Order 7 include reference to Outage Reports as specified in Section 54.209(a)(2) of the Federal Communications Commission's ("FCC") Rules. The Rule specifically requires:

[d]etailed information on any outage, 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] 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). 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 C the qualified outages for calendar year 2011. The information provided is for the entire state of Arkansas, not just the Designated Area.

REDACTED

CONFIDENTIAL OUTAGE REPORT

Arkansas 2012 Filings

(Annual Recertification)

VI. AT&T MOBILITY UNFULFILLED SERVICE EXTENSION REQUESTS IN THE ARKANSAS DESIGNATION

The Commission's requirements in Docket No. 06-050-R include reference to Unfulfilled Service Extension Requests as specified in §54.209(a)(3) of the FCC's Rules. The rules require an ETC to annually 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 as set forth in §52.202(a)(1)(i). In 2011 AT&T Mobility had no (zero) unfulfilled service requests.