

Michigan 2012 Filings (Annual Recertification)

CONSUMER PROTECTION¹⁷

AT&T Mobility will continue to satisfy applicable consumer protection standards throughout its ETC designated area in accordance with *Checklist* item 5 and FCC Rule 54.313(a)(5).

A. Privacy Policy¹⁸

¹⁷ Check for item 4(d).

¹⁸ Check for item 5.

¹⁹ Check for item 3(a).

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AT&T Mobility's privacy policy is available to all customers or potential customers on its website at: <http://www.att.com/privacy/>. See also Exhibit I.

B. CTIA Consumer Code¹⁹

As set forth in former FCC Rule 54.202(a)(3), a commitment by a wireless carrier to comply with the CTIA Consumer Code of Conduct ("Consumer Code") satisfies the applicable consumer protection standards. AT&T Mobility is a voluntary signatory to the Consumer Code. As an ETC in Michigan, AT&T Mobility is committed to complying with the Consumer Code. <http://www.wireless.att.com/learn/articles-resources/consumer-code.jsp>

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A. Ability to Remain Functional in Emergency Situations¹³

AT&T Mobility and its affiliates have prepared and implemented Disaster Recovery plans that include the State of Michigan. In forming these plans, AT&T Mobility and its affiliates have evaluated the types of emergency situations most likely to impact networks in Michigan, and have established policies and procedures designed to ensure that AT&T Mobility is properly prepared to respond when emergencies do occur.

B. Back-up Power¹⁴

In preparation for power outages, AT&T Mobility has at least 6 hours of battery backup power and 1 generator at its switch locations. In addition, most of AT&T Mobility's cell sites have battery back-up and there are permanent generators at many of its critical cell sites (not all cell sites are conducive to generators). Cell sites are equipped to accept "plug in" portable power, and portable generators are available for deployment in the region.

AT&T Mobility also has monitoring systems in place so that it quickly knows if it has any switches or cell sites that are not functioning properly so that it can deploy resources appropriately.

C. Rerouting Traffic/Network Redundancy¹⁵

¹³ CTR 400/401 item 4(a).

¹⁴ CTR 400/401 item 4(b).

¹⁵ CTR 400/401 item 4(c).

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AT&T Mobility provides for redundancy in its wireless network through several means. First, AT&T Mobility generally designs its network so that adjacent cell sites have some overlapping coverage so that if one cell site is down a customer may be able to establish a connection with an adjacent cell site. Second, some cell sites are designed to provide additional capacity in an area, this results in providing an additional cell site with coverage to a particular area. Further, in response to natural disasters, such as tornadoes or ice storms, AT&T Mobility has a number of portable generators that can be used at the ETC cell sites, a Cell Site on Wheels ("COW"), and portable microwave equipment (when there is an outage of the lines that AT&T Mobility leases from the wholesale carrier) that it can deploy.

D. Traffic Spikes¹⁶

AT&T Mobility plans and takes into account the likelihood that there will be increased call volume during certain situations and designs its network accordingly. Specifically, AT&T Mobility designs its network to handle the traffic that is generated in the busiest hour of the day.

EXHIBIT F

Oregon 2012 Filings (Annual Recertification)

This exhibit includes information to be filed with the Public Utilities Commission of Oregon on or before 8/1/12 covering the 2011 calendar year.

Specifically the exhibit includes the following pages or text:

Page 2-5	54.313(a)(2) Federal Outages
	Federal Outages are attached as Confidential Report 5 to the Annual Recertification
Page 6-7	54.313(a)(3) Unfulfilled Service Extension Requests
	U-SERs are attached as Report 2 to the Annual Recertification
Page 8	54.313(a)(4) Complaints per 1000 handsets/subscribers
Page 9	54.313(a)(5) Consumer Protection (i.e., CTIA Certification)
	CTIA certification is certified in Report 9.3
Page 9	54.313(a)(6) Emergency Preparedness Plans
	Emergency Preparedness Plan is certified in Report 9.3

REDACTED

CONFIDENTIAL OUTAGE REPORT

Oregon 2012 Filings (Annual Recertification)

Report #2 – Unfulfilled Service Requests

2.1. Unfulfilled Service Requests/Held Orders – All ETCs

Choose either A. or B. below, as applicable:

A. ___ Service quality reports for “primary held orders over 30 days” were filed with the Oregon PUC for calendar year 2011. No additional submission is required for recertification purposes.

B. Service quality reports for “primary held orders over 30 days” were not filed with the Oregon PUC for calendar year 2011. In this case, choose one of the following alternatives for reporting:

1. The number of customer requests for supported services that were not fulfilled during calendar year 2011: 0.
If greater than zero, include an attachment noting for each such request, the location (address) of the request and a description of attempts to provide service.

2. ___ The number of “primary held orders over 30 days” (as defined in Section 860-034-0390 of the Oregon Commission rules) for calendar year 2011: _____.
If greater than zero, include attachment noting for each such held order, the reason the order was held and the original commitment date.

See

Exhibit 2.1.

Exhibit 2.1 Unfulfilled Service Request

Zero Unfulfilled SERs to report.

Oregon 2012 Filings (Annual Recertification)

Exhibit 2.2 Service Extension Request Process

Process Overview

The Service Extension process involves 6 major components:

1. Modifying or replacing customer equipment
2. Adjusting other network or customer equipment
3. Adjusting nearest cell site
4. Reselling another carrier's services
5. Construct a repeater or extender (not applicable due to E911 impacts)
6. Constructing a cell site

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Oregon complaints / 1000 subscribers in 2011 is .18632. Please note that the ORPUC requires CETCs to submit the average monthly number of customer trouble reports received per 100 wireless handsets for each company switch. AT&T Mobility has aggregated this more granular reporting data for this FCC filing. Finally, please note that AT&T Mobility is reporting this information for all of its markets in Oregon, including those outside of its ETC service area.

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9.3. Certification of Emergency Functionality and Compliance with Service Quality and Consumer Protection Measures – All ETCs

Each ETC must submit a notarized affidavit signed by a responsible company official certifying that the carrier: 1) is able to remain functional in an emergency, and 2) is complying with all service quality and consumer protection measures in either the applicable Oregon Commission rules (for wireline carriers), the CTIA Consumer Code (for wireless carriers), or some other specific set of standards. All ETCs must submit this affidavit.

EXHIBIT G

Puerto Rico 2012 Filings (Annual Recertification)

This exhibit includes extracts from reports filed with the Telecommunications Regulatory Board of Puerto Rico covering the calendar year of 2011.

Specifically the exhibit includes the following pages

Page 2-8	54.313(a)(2) Federal Outages	Federal Outages are attached as Confidential Exhibit D to the Annual Recertification
Page 9	54.313(a)(3) Unfulfilled Service Extension Requests	U-SERs are included in the Annual Recertification Pleading
Page 10	54.313(a)(4) Complaints per 1000 handsets/subscribers	Complaints per 1000 are attached as Exhibit 5 to the Annual Recertification
Page 11	54.313(a)(5) Consumer Protection (i.e., CTIA Certification)	CTIA certification is certified in the Recertification Pleading
Page 12	54.313(a)(6) Emergency Preparedness Plans	Emergency Preparedness Plan is attached as Exhibit E to the Annual Recertification

Puerto Rico 2012 Filings

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C. Network Outages

The Board has adopted 47 C.F.R. § 54.209(a)(2),⁴ which requires an ETC to make an annual filing of outages within its Designated Area. The 2005 ETC Designation Framework Order provides that this information is to be reported for the preceding calendar year. The information required by 47 C.F.R. § 54.209(a)(2) for the time period January 1, 2011 through December 31, 2011 is contained within **Exhibit D**.

REDACTED

CONFIDENTIAL OUTAGE REPORT

Puerto Rico 2012 Filings

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D. Unfulfilled Requests for Service

The Board has adopted 47 C.F.R. § 54.209(a)(3), which requires an ETC to make an annual report of the number of requests for service from potential customers within the ETC's designated service areas that were unfulfilled during the past year. AT&T Mobility did not have any unfulfilled request for service within the Designated Area from January 1, 2011 through December 31, 2011.

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E. Complaints Per 1,000 Handsets Or Lines

The Board has adopted 47 C.F.R. § 54.209(a)(4), which requires an ETC to annually report the number of complaints per 1,000 handsets or lines. AT&T Mobility identified the number of complaints received from the Board, the Department of Consumer Affairs ("DACO"), the FCC, and the Better Business Bureau ("BBB") during the period January 1, 2011 through December 31, 2011, and determined that it had 0.172 complaints per 1,000 handsets.⁵ AT&T Mobility believes that this information best represents customer complaints, which is the requirement. Calls into customer care can 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 contact a state or federal agency or the BBB more often than not have a complaint and are not contacting the company with an inquiry.

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V. CONSUMER PROTECTION

AT&T Mobility will continue to satisfy applicable consumer protection standards throughout its ETC designated area in accordance with 2005 ETC Designation Framework Order.

A. Privacy Policy

AT&T Mobility's privacy policy is available to all customers or potential customers on its website in English at <http://www.att.com/gen/privacy-policy?pid=2506> and in Spanish at http://espanol.att.com/privacy_policy/index.html.

B. CTIA Consumer Code

As set forth in 47 C.F.R. § 54.202(a)(3), a commitment by a wireless carrier to comply with the CTIA Consumer Code of Conduct ("Consumer Code") satisfies the applicable consumer protection standards. AT&T Mobility is a voluntary signatory to the Consumer Code and is committed to complying with it. See <http://www.wireless.att.com/learn/articles-resources/consumer-code.jsp>.

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IV. AT&T MOBILITY'S EMERGENCY PREPAREDNESS

The Board has adopted 47 C.F.R. § 54.209(a)(6), which requires an ETC to certify its ability to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2). The standards in § 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. The required information concerning AT&T Mobility's Emergency Preparedness for the designated Area from January 1, 2011 through December 31, 2011.

A. Ability to Remain Functional in Emergency Situations

AT&T Mobility and its affiliates have prepared and implemented Disaster Recovery plans that include Puerto Rico. In forming these plans, AT&T Mobility and its affiliates have evaluated the types of emergency situations most likely to impact networks in Puerto Rico, and have established policies and procedures designed to ensure that AT&T Mobility is properly prepared to respond when emergencies do occur.

EXHIBIT H

West Virginia 2012 Filings (Annual Recertification)

This exhibit includes information to be filed with the Public Service Commission of West Virginia on or before 8/1/12 covering the 2011 calendar year.

Specifically the exhibit includes the following pages or text:

- | | |
|----------|-----------------------------------------------------------------------------------------|
| Page 2-4 | 54.313(a)(2) Federal Outages |
| | Federal Outages are attached as Confidential Attachment 4 to the Annual Recertification |
| Page 5 | 54.313(a)(3) Unfulfilled Service Extension Requests |
| | U-SERs are attached as Attachment 5 to the Annual Recertification |
| Page 6 | 54.313(a)(4) Complaints per 1000 handsets/subscribers |
| | Complaints per 1000 are attached as Attachment 6 to the Annual Recertification |
| Page 7 | 54.313(a)(5) Consumer Protection (i.e., CTIA Certification) |
| | CTIA certification is certified in the Recertification Pleading |
| Page 8 | 54.313(a)(6) Emergency Preparedness Plans |
| | Emergency Preparedness Plan is certified in the Recertification Pleading |

West Virginia 2012 Filings (Annual Recertification)

2. Network Outages in Designated

The Commission requires that ETC's file the following information regarding network outages:

Detailed information on any outage lasting at least 30 minutes that potentially affects at least ten percent of the end users in a designated service area, or that potentially affects a 911 special facility as defined in subsection (e) of section 4.5 of the Outage Reporting Order. Specifically, the ETC's annual report must include: (i) the date and time of onset of the outage; (ii) a brief description of the outage and its resolution; (iii) the particular services affected; (iv) the geographic areas affected by the outages; (v) steps taken to prevent a similar situation in the future; and (iv) the number of customers affected. In addition, in Case No. 09-0784-T-GI the Commission stated that it also requires wireless carriers to provide the wire centers affected by the outage.

Confidential Attachment 4 contains the required outage information for the 2011 calendar year. To determine the number of subscribers affected by an outage, AT&T Mobility had to make certain assumptions regarding the population covered by a cell site.

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CONFIDENTIAL OUTAGE REPORT

West Virginia 2012 Filings (Annual Recertification)

3. Number of Unfulfilled Service Requests

The Commission's Order requires an ETC to provide information on the number of requests for service from potential customers that were unfulfilled for the past year along with details as to how the ETC attempted to provide service to those potential customers. The required information concerning AT&T Mobility's unfulfilled requests for service within its designated area for the 2011 calendar year is contained in **Attachment 5**

Attachment 5

AT&T MOBILITY'S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2011 CALENDAR YEAR

Number of Unfulfilled Requests for Service	Description of How Service Was Attempted
0	N/A

West Virginia 2012 Filings (Annual Recertification)

4. Number of Complaints per 1,000 Connections

The Commission's Order requires an ETC to annually report on the number of complaints per 1,000 connections. Attachment 6 identifies the number of complaints received from the Public Service Commission of West Virginia, the FCC, the West Virginia Attorney General, or the Better Business Bureau (BBB), per 1,000 connections during the 2011 calendar year. AT&T Mobility believes that this information best represents customer complaints. The information contained in the attachment is limited to the AT&T Mobility ETC designated area.

Attachment - 6

2011 ETC Customer Complaints

ETC Area Customer Count	
Complaints Per 1000 Connections	0.39 *

*Number based on complaints and total customers in the ETC designated areas.

West Virginia 2012 Filings

(Annual Recertification)

5. Certification that Complying with Applicable Service Quality and Consumer Protection Rules

The Commission requires an ETC to certify that it is complying with the applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service. AT&T Mobility certifies that it is in compliance with the CTIA Consumer Code and will continue to comply with the principles set forth therein.