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December 13, 2013

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: AT&T Inc. and Centennial Communications Corp. Applications for
Consent to Transfer Control of Commission Licenses, Authorizations, and
Spectrum Leasing Arrangements, WT Docket No. 08-246

Dear Ms. Dortch:

On behalf of AT&T and as required by paragraph 164 in the above referenced
Order released on November 5, 2009, attached is the Centennial Commitment
Compliance Report. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,
/s/Celia Nogales

Cc: Kathy Harris
Neil Dellar

**Centennial Commitments 2-7 Compliance Report
for the Period May 6, 2013 through November 5, 2013**

December 13, 2013

In an ex parte dated October 22, 2009, AT&T Inc. (“AT&T”) agreed to several commitments in connection with obtaining the Commission's approval of AT&T's acquisition of Centennial Communications Corp. (“Centennial”).¹ Among other things, AT&T agreed to “appoint a compliance officer (the ‘Compliance Officer’) to oversee AT&T's compliance with Commitments 2-7 [as set forth in the October 22 ex parte]. . . . [T]he Compliance Officer . . . shall provide the FCC with a report every 6 months that shall provide information on (i) the monitoring activities undertaken during the report period; (ii) any violations of Commitments 2-7 that were identified during the report period; (iii) and any and all steps taken to address and/or resolve identified violations.”² The Commission approved the Centennial acquisition on November 5, 2009.³ The transaction closed on November 6, 2009. AT&T hereby submits its report regarding its compliance with Centennial Commitments 2-7 (hereinafter “Centennial Commitments 2-7” or “Commitments”) for the period May 6, 2013 through November 5, 2013 (“Report Period”):

I. Monitoring Activities Undertaken During the Report Period

As background, AT&T filed its Compliance Program for Centennial Commitments 2-7 (“Compliance Program”) with the Commission on December 22, 2009. Attachment A to the Compliance Program lists the Responsible Business Units to which responsibility for the various Commitments has been assigned. AT&T filed its first Centennial Commitments 2-7 Compliance Report, for the period November 6, 2009 through May 5, 2010 (hereinafter “First Compliance Report”), with the Commission on June 18, 2010. Among other things, the First Compliance Report indicates that each Responsible Business Unit has established an individual Responsible Business Unit Compliance Plan that addresses, among other things, training/education of business unit personnel on the Commitments applicable to that business unit, how personnel within the business unit are

¹ Attachment A to Letter from Joan Marsh, Vice-President, AT&T Regulatory, to Ruth Milkman, Chief, Wireless Telecommunications Bureau, FCC, WT Docket No. 08-246 (Oct. 22, 2009) (hereinafter “October 22, 2009 ex parte”).

² *Id.* ¶ 8.

³ *AT&T Inc. and Centennial Communications Corp. Applications for Consent to Transfer Control of Commission Licenses, Authorizations, and Spectrum Leasing Arrangements*, Memorandum Opinion and Order, FCC 07-44 (released Nov. 5, 2009).

to report suspected violations of the Commitments, and compliance record keeping within the business unit.

AT&T's compliance efforts during the current Report Period focused primarily on continuing to ensure that affected personnel within the Responsible Business Units received periodic training on their obligations under the Commitments, as well as how to report suspected violations of the Commitments. In addition, the corporate compliance coordinator for the Commitments, with the assistance and advice of AT&T Legal, held conference calls with various business unit personnel from time to time to answer their questions on the Commitments, as the need arose.

At the direction of the Compliance Officer, each officer or other manager overseeing a Responsible Business Unit is required to submit an internal certification to the Compliance Officer, at the end of each six-month Report Period, verifying that (i) the Responsible Business Unit took reasonable steps to ensure full compliance by that unit during the Report Period with all assigned Commitments; and (ii) based upon reasonable diligence and inquiry, there were no known instances of non-compliance during the Report Period, or, if there were, an identification of such instances of non-compliance along with corrective action taken. For the Report Period at issue, all internal certifications have been received by the Compliance Officer. No instances of non-compliance were identified in the verifications. AT&T is not otherwise aware of any violations of the Commitments during the Report Period.

II. Violations of Commitments 2-7 Identified During the Report Period

As indicated, there were no violations of the Commitments identified during the Report Period.

III. Any and All Steps Taken to Address and/or Resolved Identified Violations

Because there were no violations of the Commitments identified during the Report Period, no corrective action was necessary.