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December 16, 2013

*Via E-Mail*

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

Karen Majcher  
Vice President – High Cost and Low Income Division  
USAC  
2000 L St., NW  
Suite 200  
Washington, DC 20036

**Re: *Connect America Fund, WC Docket No. 10-90; Annual Section 54.314(b) Certifications for Study Area Codes: 199009; 259005; 259908; 399015; 619004***

Dear Ms. Dortch and Ms. Majcher:

In accordance with 47 C.F.R. § 54.314(b), attached please find copies of affidavits for five AT&T Mobility eligible telecommunications carrier (ETC) affiliates. Four of the five affiliates certify that they have used in 2012 and will use in 2014 all federal high-cost support for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The fifth affiliate, New Cingular Wireless PCS, LLC (f/k/a Corr Wireless Communications, LLC (Corr)), will relinquish its designation effective December 31, 2013.<sup>1</sup> Consequently, its use certification only covers calendar year 2012. For the remaining affiliates, three of the four affidavits are for Commission-designated ETCs that provide service in Alabama, the Pine Ridge Reservation in South Dakota, and Virginia. The fourth affidavit is for AT&T Mobility's ETC affiliate in Alaska. While the Alaska Commission, not the Commission, issued the ETC designation, AT&T Mobility determined that it should nonetheless submit its use certification directly to the Commission and USAC. I have attached a copy of the Alaska Commission order that is the basis for AT&T Mobility's determination.

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<sup>1</sup> See *Telecommunications Carriers Eligible for Universal Service Support et al.*, WC Docket Nos. 09-197 et al., Order, DA 13-2238 (rel. Nov. 21, 2013) (approving AT&T Mobility's notification that it is relinquishing the Corr ETC designation effective December 31, 2013).

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Cathy Carpino  
Cathy Carpino

Attachments

AFFIDAVIT REGARDING THE USE OF FEDERAL HIGH-COST SUPPORT

New Cingular Wireless PCS, LLC (SAC 259005)

STATE OF ALABAMA     )  
  )  
COUNTY OF JEFFERSON )

The undersigned, Rich Guidotti, does hereby certify as follows:

1. I serve as Vice President and General Manager – Gulf States for AT&T Mobility Corporation. I am authorized to make this certification on behalf of New Cingular Wireless PCS, LLC (f/k/a Corr Wireless Communications, LLC (“Corr”) (collectively, “AT&T Mobility”).
2. I am a corporate officer of AT&T Mobility Corporation, the manager of New Cingular Wireless PCS, LLC.
3. The Federal Communications Commission (“FCC”) originally designated Corr as an eligible telecommunications carrier (“ETC”) for certain areas within the State of Alabama on October 31, 2002. *Federal-State Joint Board on Universal Service, Corr Wireless Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier*, 17 FCC Rcd 21435 (WCB 2002). Upon Corr’s request, the Commission subsequently expanded Corr’s Alabama ETC service area on two separate occasions. *See Federal-State Joint Board on Universal Service, Corr Wireless Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier*, 21 FCC Rcd 1217 (WCB 2006); *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al., Petitions for Designation as Eligible Telecommunications Carrier*, Order, 23 FCC Rcd 8834 (2008). On August 20, 2013, the Commission approved AT&T Inc.’s acquisition of Corr. *Applications of AT&T Inc. and Cellular South, Inc. for Consent to Assign Licenses Covering Parts of Alabama, Georgia, and Tennessee*, 28 FCC Rcd 12328 (WTB 2013). And, on November 21, 2013, the FCC approved AT&T Mobility’s notification that it was relinquishing the Corr ETC designation effective December 31, 2013. *See Telecommunications Carriers Eligible for Universal Service Support et al.*, WC Docket Nos. 09-197 et al., Order, DA 13-2238 (rel. Nov. 21, 2013).
4. AT&T Mobility files this affidavit in compliance with 47 C.F.R. § 54.314(b), which requires carriers that are not subject to state jurisdiction to self-certify to the FCC and the Universal Service Administrative Company (“USAC”) that all federal high-cost universal service support received by the carrier was used and will only be used for the provision, maintenance and upgrading of facilities and services for which support is intended.

5. In accordance with section 54.314(b) of the FCC's rules and section 254(e) of the Communications Act of 1934, as amended, AT&T Mobility hereby certifies that it only used federal high-cost universal service support received during the preceding calendar year (2012) for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

By: Rich Guidotti  
Rich Guidotti  
Vice President and General Manager

Subscribed and sworn to before  
me this 9<sup>th</sup> day of December 2013.  
Lisa Henderson Notary Public



AFFIDAVIT REGARDING THE USE OF FEDERAL HIGH-COST SUPPORT

New Cingular Wireless PCS, LLC (SAC 259908)

STATE OF ALABAMA     )  
  )  
COUNTY OF JEFFERSON )

The undersigned, Rich Guidotti, does hereby certify as follows:

1. I serve as Vice President and General Manager – Gulf States for AT&T Mobility Corporation. I am authorized to make this certification on behalf of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (“AT&T Mobility”).
2. I am a corporate officer of AT&T Mobility Corporation, the manager of New Cingular Wireless PCS, LLC.
3. On May 1, 2008, the Federal Communications Commission (“FCC”) designated AT&T Mobility as an eligible telecommunications carrier (“ETC”) for certain areas within the State of Alabama and, thus, is eligible to receive federal high-cost support. *See High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al., Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment, Order, WC Docket No. 05-337, CC Docket No. 96-45, 23 FCC Red 8834, Appendix B (2008).*
4. AT&T Mobility files this affidavit in compliance with 47 C.F.R. § 54.314(b), which requires carriers that are not subject to state jurisdiction to self-certify to the FCC and the Universal Service Administrative Company (“USAC”) that all federal high-cost universal service support received by the carrier will only be used for the provision, maintenance and upgrading of facilities and services for which support is intended.
5. In accordance with section 54.314(b) of the FCC’s rules and section 254(e) of the Communications Act of 1934, as amended, AT&T Mobility hereby certifies that it only used federal high-cost universal service support received during the preceding calendar year (2012) and will only use federal high-cost universal service support in the coming calendar year (2014) for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

By: Rich Guidotti  
Rich Guidotti  
Vice President and General Manager

Subscribed and sworn to before  
me this 9<sup>th</sup> day of December 2013.

Lisa Henderson Notary Public



AFFIDAVIT REGARDING THE USE OF FEDERAL HIGH-COST SUPPORT

AT&T Mobility LLC (SAC 199009)

STATE OF NORTH CAROLINA )
COUNTY OF MECKLENBURG )

The undersigned, Cristy Swink, does hereby certify as follows:

- 1. I serve as Vice President and General Manager/Mid-Atlantic for AT&T Mobility Corporation, the manager for AT&T Mobility LLC. I am authorized to make this certification on behalf of AT&T Mobility LLC ("AT&T Mobility").
2. I am a corporate officer of AT&T Mobility Corporation, the manager of AT&T Mobility LLC.
3. On two separate occasions, the Federal Communications Commission ("FCC") designated entities now owned and controlled by AT&T Mobility as eligible telecommunications carriers ("ETCs") for certain areas within the State of Virginia and, thus, eligible to receive federal high-cost support.
4. AT&T Mobility files this affidavit in compliance with 47 C.F.R. § 54.314(b), which requires carriers that are not subject to state jurisdiction to self-certify to the FCC and the Universal Service Administrative Company ("USAC") that all federal high-cost universal service support received by the carrier will only be used for the provision, maintenance and upgrading of facilities and services for which support is intended.
5. In accordance with section 54.314(b) of the FCC's rules and section 254(e) of the Communications Act of 1934, as amended, AT&T Mobility hereby certifies that it only used federal high-cost universal service support received during the preceding calendar year (2012) and will only use federal high-cost universal service support in the coming calendar year (2014) for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

AT&T Mobility LLC
By: AT&T Mobility Corporation
Its: Manager
By: [Signature]
Name: Cristy Swink
Title: Vice President and General Manager/ Mid-Atlantic

Subscribed and sworn to before me this 9 day of December 2013.

[Signature] Notary Public
Notary # 19972720082
Expires 5-16-15



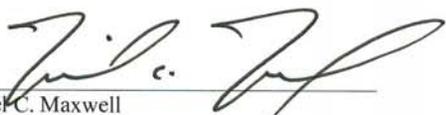
AFFIDAVIT REGARDING THE USE OF FEDERAL HIGH-COST SUPPORT

New Cingular Wireless PCS, LLC (SAC 619004)

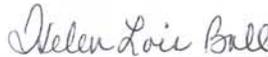
STATE OF OREGON            )  
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COUNTY OF CLACKAMAS    )

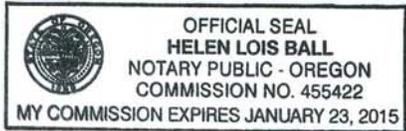
The undersigned, Michael C. Maxwell, does hereby certify as follows:

1. I serve as Vice President and General Manager for AT&T Mobility LLC. I am authorized to make this certification on behalf of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility").
2. I am a corporate officer of AT&T Mobility Corporation, the manager of New Cingular Wireless PCS, LLC.
3. 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 and, thus, is eligible to receive federal high-cost support.
4. AT&T Mobility files this affidavit in compliance with 47 C.P.R. §54.314(b), which requires carriers that are not subject to state jurisdiction to self-certify to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") that all federal high-cost universal service support received by the carrier will only be used for the provision, maintenance and upgrading of facilities and services for which support is intended. Attached as Exhibit A is a true and correct copy of the RCA's August 24, 2009 Order directing all wireless ETCs in the State of Alaska to self-certify to the FCC and USAC (p. 3).
5. In accordance with section 54.314(b) of the FCC's rules and section 254(e) of the Communications Act of 1934, as amended, AT&T Mobility hereby certifies that it only used federal high-cost universal service support received during the preceding calendar year (2012) and will only use federal high-cost universal service support in the coming calendar year (2014) for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

By:   
Michael C. Maxwell  
Vice President and General Manager

Subscribed and sworn to before  
me this 31<sup>st</sup> day of October 2013.

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STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners: Robert M. Pickett, Chairman  
Kate Giard  
Paul F. Lisankie  
Anthony A. Price  
Janis W. Wilson

In the Matter of the Commission Compliance )  
with Federal Requirement to Certify Proper Use ) U-09-94  
of 2010 Federal Universal Service Funds by )  
Telecommunications Carriers ) ORDER NO. 1

**ORDER OPENING DOCKET, REQUIRING DATA, DESIGNATING COMMISSION  
PANEL, AND APPOINTING ADMINISTRATIVE LAW JUDGE**

BY THE COMMISSION:

Summary

We open this docket to consider the annual federal universal service fund certification with the Federal Communications Commission (FCC). We require rural regulated eligible telecommunications carriers (ETCs) and rural wireless ETCs to file information in accordance with the attached data response and affidavit form by September 18, 2009. The chairman designates a commission panel, and appoints an administrative law judge.

Background

We must file an annual certification with the FCC in order for rural Alaskan ETCs to receive federal universal service funds (USF).<sup>1</sup> The certification must be filed by October 1 for the ETCs to receive USF in the first, second, third, and fourth quarters

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<sup>1</sup>47 C.F.R. § 54.314(a).

1 of the succeeding year.<sup>2</sup> The certification must state that all USF received by the rural  
2 Alaskan ETCs will be used only for the provision, maintenance, and upgrade of facilities  
3 and services for which the support is intended.<sup>3</sup>

4 Discussion

5 An ETC is eligible to receive support to provide, maintain, and upgrade  
6 facilities and services for which the support is intended.<sup>4</sup> Certification that funds will  
7 only be used for their intended purpose is required for continued receipt of certain  
8 federal USF by rural carriers. However, a regulated rural ETCs receipt of USF is  
9 contingent on our certification to the FCC that the ETC will use the funds only for their  
10 intended purpose. We annually issue a data request to obtain information to assist us  
11 in submitting the October certification with the FCC.<sup>5</sup> This order provides that data  
12 request.

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18 <sup>2</sup>47 C.F.R. § 54.314(d)(1).

19 <sup>3</sup>47 C.F.R. § 54.314(a).

20 <sup>4</sup>47 U.S.C. § 254(e).

21 <sup>5</sup>See Order U-08-94(1), *Order Opening Docket, Requiring Data, Addressing*  
22 *Timeline for Decision, Designating Commission Panel, and Appointing Administrative*  
23 *Law Judge*, dated August 4, 2008; Order U-07-83(1), *Order Opening Docket, Requiring*  
24 *Data, Addressing Timeline for Decision, Designating Commission Panel, and Appointing*  
25 *Administrative Law Judge*, dated July 23, 2007, as corrected by *Errata Notice to Order*  
26 *U-07-83(1)*, dated July 26, 2007; Order U-06-92(1), *Order Opening Docket, Requiring*  
*Data, Addressing Timeline for Decision, Designating Commission Panel, and Appointing*  
*Administrative Law Judge*, dated August 15, 2006; Order U-05-58(1), *Order Opening*  
*Docket and Requiring Data*, dated July 22, 2005 (Order U-05-58(1)); Order U-04-70(1),  
*Order Opening Docket, Requesting Data, and Inviting Comment*, dated August 9, 2004.

1 A wireless ETC providing service in a rural service area is required to file  
2 certification directly with the FCC in order to continue to receive federal USF.<sup>6</sup> In light of  
3 this federal requirement, our process of 2007 and 2008 did not include wireless  
4 companies as part of our annual certification with the FCC. Some carriers however,  
5 were confused by the fact that we asked for data on use of funds in 2008, but did not list  
6 wireless carriers in our certification letter, thinking we would file certification on their  
7 behalf. To help eliminate confusion we revert back to our certification letter text of 2006,  
8 where we list wireless and wireline ETCs as having certified to us use of funds. We  
9 clarify that it is ultimately the wireless carrier's responsibility to file individual  
10 certifications with the FCC concerning use of funds by a non-regulated entity.<sup>7</sup>

11 Data Response and Affidavit Forms

12 We require rural regulated<sup>8</sup> ETCs operating in Alaska to file a completed  
13 Regulated ETC and Wireless ETC Data Response and Affidavit form, based on  
14 self-certification. Rural wireless ETCs<sup>9</sup> must likewise file a completed Regulated ETC  
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17 <sup>6</sup>47 C.F.R. § 54.314(b).

18 <sup>7</sup>For example, our September 29, 2006, certification letter to the FCC stated:

19 We have included wireless ETCs on our list of carriers even though these  
20 carriers are not economically regulated by the Alaska Commission. We have  
21 done so as we directed the companies to file annual certifications with us  
22 concerning their use of funds and we plan to regularly review their responses  
23 in this area. These companies should be filing individual certifications with  
24 the FCC concerning use of funds by a non-regulated entity.

25 <sup>8</sup>For purposes of this order, companies that are economically regulated with  
26 respect to local exchange service are those entities required to maintain a service tariff  
on file with the Regulatory Commission of Alaska.

<sup>9</sup>A rural wireless ETC is a wireless carrier that has obtained ETC status for a  
rural area in Alaska. When granting ETC status, we require wireless ETCs to file data  
according to the same use-of-funds data form that applies to regulated Alaskan  
companies.

1 and Wireless ETC Data Response and Affidavit form, based on self-certification. We  
2 attach the form to this order as an appendix.

3 Non-rural Certification

4 The FCC also has adopted regulations concerning annual certification of  
5 non-rural companies as a condition of continued receipt of forward-looking support and  
6 interim hold-harmless support.<sup>10</sup> Historically, we have not submitted such a certificate  
7 as we concluded it was unnecessary given conditions in Alaska's non-rural market.<sup>11</sup>  
8 We do not plan to submit such a non-rural certificate this year.

9 Commission Panel

10 The chairman designates Commissioners Kate Giard, Anthony A. Price  
11 and himself as the commission panel<sup>12</sup> and further designates himself as the  
12 commission docket manager.

13 Administrative Law Judge

14 Under AS 42.04.070(b), the chairman appoints Administrative Law Judge  
15 John P. Wood to facilitate conduct of the docket. The administrative law judge will issue  
16 procedural orders in this docket including discovery orders, unless the commission  
17 docket manager determines that a particular procedural order should be issued by the  
18 commission panel.<sup>13</sup> Orders issued by the administrative law judge will be considered  
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21 <sup>10</sup>47 C.F.R. § 54.313.

22 <sup>11</sup>Order U-05-58(1) at 3.

23 <sup>12</sup>Under AS 42.04.080(a), the chairman designates a commission panel to hear,  
or, if a hearing is not required, to otherwise consider and decide docketed matters.

24 <sup>13</sup>The commission docket manager, after consultation with other members of the  
25 panel, may delegate to the administrative law judge whatever authority to issue  
26 procedural orders he or she considers necessary or advisable in this docket. See  
3 AAC 48.165(b).

1 orders of the commission for purposes of petitions for reconsideration under  
2 AS 42.05.171.<sup>14</sup>

3 **ORDER**

4 THE COMMISSION FURTHER ORDERS:

5 1. By 4 p.m., September 18, 2009, rural eligible telecommunications  
6 carriers subject to economic regulation shall file a completed Regulated ETC and  
7 Wireless ETC Data Response and Affidavit form.

8 2. By 4 p.m., September 18, 2009, rural wireless eligible  
9 telecommunications carriers shall file a completed Regulated ETC and Wireless ETC  
10 Data Response and Affidavit form.

11 3. The commission panel shall consist of Kate Giard, Anthony A. Price,  
12 and Robert M. Pickett.

13 4. Commissioner Robert M. Pickett is designated as the commission  
14 docket manager.

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<sup>14</sup>AS 42.05.171 states, in pertinent part:

24 A party may file a petition for reconsideration of, or an administrative appeal  
25 of, a decision by a hearing examiner, an arbitrator, a mediator, or an  
26 administrative law judge that has been approved by the commission, or a  
decision of a hearing panel.

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5. John P. Wood is appointed as administrative law judge in this proceeding.

DATED AND EFFECTIVE at Anchorage, Alaska, this 24th day of August, 2009.

BY DIRECTION OF THE COMMISSION  
(Commissioners Paul F. Lisankie and Janis W. Wilson, not participating.)



**Regulatory Commission of Alaska**  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501  
(907) 276-6222; TTY (907) 276-4533