

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

In the Matter of the Application for NEW) DOCKET NO. _____
CINGULAR WIRELESS PCS, LLC for)
Designation as an Eligible)
Telecommunications Carrier)

**APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER**

New Cingular Wireless PCS, LLC, a subsidiary of AT&T Mobility LLC, (herein after referred to as “AT&T Mobility”) respectfully requests that the North Dakota Public Service Commission (“Commission) designate AT&T Mobility as an eligible telecommunications carrier (“ETC”) pursuant to N.D. Cent. Code § 49-21-01.7(12) and Section 214(e)(2) of the federal Communications Act of 1934 (“Act”), as amended, for the purpose of qualifying to obtain all available federal universal service support including, but not limited to, support for rural, insular and high costs areas, and for low-income customers.

I. Background

By way of background, on June 22, 2010, the Federal Communications Commission (“FCC”) approved AT&T Inc.’s acquisition of certain licenses and assets from Verizon Wireless.¹ Included among the assets that AT&T acquired are the FCC licenses and the wireless network serving portions of North Dakota.

¹ See *Application of AT&T Inc. and Verizon Wireless for Consent to Assign or Transfer Control of Licenses and Authorizations and Modify a Spectrum Leasing Arrangement*, WT Docket No. 09-104, Memorandum Opinion and Order, FCC 10-116 (rel. June 22, 2010) (“*AT&T/Verizon Wireless Asset Transfer Order*”). In approving Verizon Wireless’s acquisition of Alltel, the Commission required Verizon Wireless to divest business units and associated licenses in 105 markets. *Applications of Cellco Partnership d/b/a/ Verizon Wireless and Atlantis Holdings LLC For Consent to Transfer Control of Licenses, Authorizations, and Spectrum Manager and De Facto Transfer Leasing Arrangements and Petition for Declaratory Ruling that the Transaction is Consistent with Section 310(b)(4) of the Communications Act*, WT Docket No. 08-95, memorandum Opinion and Order and Declaratory Ruling, 23 FCC

The Commission previously approved the designations of Western Wireless Corporation and WWC Holding Co., Inc., (collectively referred to herein as “Western Wireless”) by order dated December 15, 1999 in Case No. PU-1564-98-428, modified by Order on Remand dated October 3, 2001, and an order dated February 12, 2004 in Case No PU-2077-03-636, respectively (the “Designation Orders”). Western Wireless was designated as an ETC in those areas identified in the Designation Orders. On July 30, 2010, Western Wireless requested relinquishment of its ETC designations in North Dakota, Case No. PU-10-510. The Commission granted Western Wireless’ request on August 24, 2010. AT&T Mobility is now seeking to be designated as an ETC in much of the same area in which Western Wireless was previously designated as an ETC.

II. Name and Address of Applicant

New Cingular Wireless PCS, LLC is a Delaware limited liability company whose principal place of business is located in Atlanta, Georgia. The names and addresses of the Applicant are:

New Cingular Wireless PCS, LLC
1025 Lenox Park Blvd NE
Atlanta, GA 30319

All correspondence regarding this Application should be sent to the following:

John Sisemore
Director-External Affairs
AT&T
208 S. Akard Street, Suite 2532
Dallas, Texas 75202

Rcd 17444 (2008). The Commission approved the transfer of the licenses and business units in 79 of those markets to AT&T in its *AT&T/Verizon Wireless Asset Transfer Order*.

The name, address and telephone number of the attorneys representing AT&T Mobility in this proceeding are as follows:²

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III. Applicable Statutes and Rules

The statutes and rules implicated by this application are as follows: 47 U.S.C. §§ 214(e) and 254; 47 C.F.R. Part 54; and N.D. Cent. Code §49-21-01.7(12) and §49-21-01.8, and NDAC §69-09-05-12 and §69-09-05-12.1.

IV. Description of ETC Designated Service Area

AT&T Mobility seeks to be designated as an ETC in 25 Qwest wire centers and 19 entire rural study areas³ listed in Exhibit A. The areas listed in Exhibit A are collectively referred to as the “ETC Designated Area”. A map of the area in which AT&T Mobility requests to be designated as an ETC is attached as Exhibit B.

V. AT&T Mobility Satisfies the Requirements to Be Designated as an ETC

Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that to be designated as an ETC an applicant must, (1) be a common carrier; (2) offer the services that are supported by federal universal service support mechanisms either using their own facilities or a combination of their own facilities and resale of another carrier's services, and (3) advertise the

² Applications to be admitted pro hoc vice in this docket will be filed for Cynthia J. Manheim and William E. Flynn.

³ AT&T Mobility is seeking designation in the entire rural study area that is located in North Dakota.

availability of such services and the charges therefore using media of general distribution.⁴ As described in more detail below, AT&T Mobility will fulfill each of these requirements.

A. AT&T Mobility is a Common Carrier

A common carrier is defined by the Act as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio...” 47 U.S.C §153(10). AT&T Mobility is a commercial mobile radio service provider (“CMRS”). As a CMRS provider, AT&T Mobility is a common carrier under federal law. See 47 C.F.R. §20.9(a).

B. AT&T Mobility Will Offer the Services Supported by the Federal Universal Service Support Mechanism

The services that are supported by the federal universal service support mechanisms under 47 C.F.R. §54.101 are:

- i. voice grade access to the public switched network;
- ii. local usage;
- iii. dual tone multi-frequency (“DTMF”) signaling or its functional equivalent;
- iv. single-party service or its functional equivalent;
- v. access to emergency services;
- vi. access to operator services;
- vii. access to interexchange service;
- viii. access to directory assistance; and
- ix. toll limitation for qualifying low-income consumers.⁵

AT&T Mobility is a facilities-based provider of telecommunications service and will provide the supported services, as described in more detail below, to its customers within its ETC designated area using its own facilities or a combination of its own facilities and the resale of other carriers’ service. AT&T Mobility will primarily use its own network infrastructure

⁴ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)

⁵ 47 C.F.R. § 54.101(a)

which includes cell sites (antennas, towers, and so forth), trunking, switching, and interconnection facilities.

Voice Grade Access. “Voice grade access” permits a telecommunications user to transmit voice communications, including signaling the network to which the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call. The FCC has determined that voice grade access to the public switched telephone network means the ability to make and receive calls with a minimum bandwidth of 300 to 3,000 Hertz.⁶ AT&T Mobility provides voice grade access to the public switched network through interconnection arrangements with local telephone companies.

Local Usage. “Local usage” is the amount of minutes of use of exchange service provided free of charge to end users.⁷ To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering. AT&T Mobility has a variety of calling plans that provide local usage consistent with this requirement. For example, customers that currently choose the AT&T Nationsm or the AT&T FamilyTalksm calling plans do not pay additional long distance charges for calls made within the United States.⁸ Examples of the AT&T Nationsm and AT&T FamilyTalksm calling plan brochures are attached as **Attachments C--1 and C-2**, respectively. Thus, AT&T Mobility provides customers with local usage consistent with this requirement.

⁶ 47 C.F.R. §54.101(a)(1)

⁷ 47 C.F.R. §54.101(a)(2)

⁸ AT&T Mobility is currently offering Alltel’s postpaid rate plans to subscribers in North Dakota. Once the AT&T Mobility network is available in North Dakota, which should occur during the second quarter of this year, customers will have access to the AT&T Nationsm and AT&T FamilyTalksm calling plans.

DTMF Signaling. “DTMF” is a method of signaling that facilitates the transportation of signaling through the network, shortening call set up time.⁹ The FCC has recognized that wireless carriers use out-of-band signaling mechanisms and found that “it is appropriate to support out-of-band digital signaling mechanisms as an alternative to DTMF signaling.”¹⁰ AT&T Mobility currently uses out-of-band digital signaling and in-band multi-frequency signaling, in accordance with the FCC’s requirements.

Single Party Service. “Single-party service” permits the exclusive use of a particular subscriber loop or access line by a single subscriber. The FCC has determined that a CMRS provider meets the requirement of offering single party service when it offers a dedicated message path for the length of a user’s particular transmission.¹¹ AT&T Mobility meets the requirements of single party service, as that term is defined, in all of its service offerings by providing a dedicated message path for the length of the user’s call.

Access to Emergency Services. “Access to emergency service” means the ability to reach a public safety answering point (“PSAP”) by dialing “911”. The FCC requires that a carrier must provide access to enhanced 911 (“E911”), which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), when the PSAP is capable of receiving such information and the service is requested from the carrier.¹² AT&T Mobility currently provides its voice customers with the ability to access emergency services by dialing “911”. AT&T Mobility is also capable of delivering ANI

⁹ 47 C.F.R. §54.101(a)(3)

¹⁰ *Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, FCC 97-157 (rel. May 8, 1997), ¶71.

¹¹ 47 C.F.R. §54.101(a)(4).

¹² 47 C.F.R. §54.101(a)(5).

and ALI information over its existing network and is in compliance with all applicable FCC E911 requirements.

Access to Operator Services. Access to operator services means access to any automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call.¹³ AT&T Mobility meets this requirement by providing access to operator services to its customers by dialing “0”.

Access to Interexchange Services. An ETC must offer consumers access to interexchange service to make and receive toll or interexchange calls.¹⁴ AT&T Mobility meets this requirement by providing all of its subscribers with the ability to make and receive interexchange calls.

Access to Directory Assistance. “Access to directory assistance” means the ability to provide access to a service, upon request, that makes directory listings available.¹⁵ AT&T Mobility meets this requirement by providing its customers access to directory assistance by dialing “411”.

Toll Limitation. “Toll limitation” includes the offering of either “toll blocking” or “toll control” to qualifying low-income customers as a means of limiting or blocking the completion of outgoing toll calls.¹⁶ AT&T Mobility’s Lifeline calling plans will satisfy this requirement by, at a minimum, allowing customers to call from their home calling area to

¹³ 47 C.F.R. §54.101(a)(6).

¹⁴ 47 C.F.R. §54.101(a)(7).

¹⁵ 47 C.F.R. §54.101(a)(8).

¹⁶ 47 C.F.R. §54.400(d).

anywhere in the United States without incurring additional toll charges, thus eliminating any distinction between local and toll calls.

C. AT&T Mobility Will Advertise Each of the Support Services

Pursuant to Section 54.201(d) of the FCC's rules and NDAC §69-09-05-12(6)(b), AT&T Mobility will advertise the availability of each of the supported services detailed above, throughout the ETC Designated Area by media of general distribution. In general, AT&T Mobility advertises its services through many different media, including television and radio, newspaper, and other print advertisements, as well as outdoor advertising, retail stores, direct marketing and the Internet. In addition, AT&T Mobility will publicize the availability of Lifeline and Link-up benefits throughout its ETC designated area, primarily through print advertising, brochures in its stores, direct outreach by AT&T Mobility, and on its website.

NDAC §69-09-05-12(6)(a) requires a full description of available services in the ETC's official telephone directory. As AT&T Mobility is a CMRS provider it does not have an official telephone directory in North Dakota. It is unclear whether this provision was intended to apply to a company that does not produce an official telephone directory. If it was intended to apply to all applicants that wish to be designated as an ETC, AT&T Mobility respectfully requests a permanent waiver from this requirement pursuant to NDAC §69-09-05-12(2)(c) and (d) as it does not produce an official telephone directory.

VI. Participation in Low Income Programs

All ETCs must participate in the federal Lifeline and Link Up programs. Lifeline provides a discount off the customer's monthly charge for service. 47 C.F.R. §54.401. Link Up is a discount off of the carrier's customary charge for commencing telecommunications service. 47 C.F.R. §54.411.

AT&T Mobility will participate in the FCC's Lifeline and Link Up programs. AT&T Mobility will offer a Lifeline Calling Plan similar to what it has offered in other states in which it is designated as an ETC. Specifically, the Lifeline Calling Plan that AT&T Mobility will offer in North Dakota is \$24.99 month before applicable Lifeline discounts (the discount is \$8.25 in non-tribal areas) and includes: 300 anytime minutes; 1000 night and weekend minutes; no additional long distance charge for calls to anywhere in the United States; and, no roaming charges for calls that originate in North Dakota, South Dakota and Minnesota.¹⁷ As AT&T Mobility is not yet designated as an ETC in North Dakota, it has not yet produced a Lifeline Calling Plan brochure for the state. For illustrative purposes, AT&T Mobility has attached its Lifeline Calling Plan brochure for Washington State as **Exhibit D**. Once AT&T Mobility is designated as an ETC in North Dakota it will produce a Lifeline Calling Plan brochure for the state which will contain similar terms and conditions to that provided in **Exhibit D**.

VII. AT&T Mobility Meets the Additional ETC Criteria Adopted by the Commission

A. Commitment to Provide Service Throughout the ETC Designated Area to All Customers Making a Reasonable Request

AT&T Mobility hereby certifies that it will provide service throughout its ETC designated area to all customers making a reasonable request for service in compliance with NDAC §69-09-05-12(3)(a). Specifically, for the purpose of evaluating the provision of service from a potential customer within its ETC designated area, AT&T Mobility will adhere to the following steps:

¹⁷ In addition to the Lifeline Calling Plan described in this section, AT&T Mobility plans to offer an additional Lifeline Calling Plan on tribal lands.

1. AT&T Mobility will provide service on a timely basis to requesting customers within AT&T Mobility's designated service area where AT&T Mobility's network already passes the potential customer's premises;
2. AT&T Mobility will provide service within a reasonable amount of time, if the potential customer is within AT&T Mobility's ETC designated area, but not within AT&T Mobility's existing network coverage, 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.

In its annual ETC report, AT&T Mobility will inform the Commission of the number of requests for service from potential customers within its ETC designated area that were unfulfilled during the past year, and it will provide an explanation of the steps it went through to provide service to those potential customers.¹⁸

B. AT&T Mobility's Plan to Utilize Federal High Cost Support

Federal high cost universal service support is to be used for the "provision, maintenance, and upgrading of facilities and services for which the support is intended." 47 U.S.C §254(e). Pursuant to NDAC §69-09-05-12(3)(b) attached hereto as **Confidential Exhibit E** is a report estimating the amount of federal high-cost support that AT&T Mobility expects to receive in the first year following designation as an ETC¹⁹ and describing how that support is projected to be used for the provision, maintenance, or upgrading of its facilities and services. The report contains the following information: specific construction, maintenance, or upgrade projects; how service will be improved by each project; the projected start date and completion date for

¹⁸ NDAC §69-09-05-12.1(3)

¹⁹ The time period included in the report is from third quarter 2011 to second quarter 2012.

each improvement; the estimated amount of investment for each of the specific geographic areas; and, the estimated population that will be served by each improvement. In accordance with the Commission's rules, this information is being submitted at the study area level.²⁰

AT&T Mobility has provided the information in Confidential Exhibit E to the best of its ability; however, there are a number of things that are beyond its control that could impact its projected federal high cost support receipts and the network improvements listed in the report. First, the amount of funding AT&T Mobility receives is dependent on a number of variables, including the per line support amount of the underlying ILEC, the number of AT&T subscribers that have service in a particular wire center, and the amount of funding that is being received by other competitive ETCs ("CETCs") in the state. In addition, there are a number of matters currently pending before the FCC that, if adopted, could greatly impact the amount of funding available for CETCs. If the federal high cost support that AT&T Mobility receives is less than it currently anticipates, AT&T Mobility may reduce or eliminate some projects included in its attached report. Second, AT&T Mobility has to the best of its ability estimated the time period in which improvements to its network will occur; however, it is important to note that the timing for the construction of a cell site or other network improvements depend on a number variables, some of which are beyond AT&T Mobility's control, such as land use approvals and weather, and thus may cause changes to the network improvements described in the attached report.

C. Functionality in Emergency Situations

AT&T Mobility certifies that it is able to remain functional in emergency situations in compliance with ND 69-09-05-12(3)(c). AT&T Mobility has taken numerous actions for

²⁰ In developing its report provided in Confidential Exhibit E, AT&T Mobility took into account the letter sent by the Public Service Commission to Alltel and Badlands Cellular of North Dakota Limited Partnership dated December 22, 2008, regarding service improvements in the Rhame, North Dakota area.

emergency preparedness, including putting into place a comprehensive disaster recovery plan. In preparation for power outages, AT&T Mobility has battery backup and/or permanent generators at the majority of its cell sites.²¹ In addition, portable generators are available for deployment to cell site locations and permanent generators are located at all switch locations. Moreover, AT&T has Cells on Light Trucks (“COLTS”) and Cells on Wheels (“COWs”) that it can deploy.

AT&T Mobility also has monitoring systems in place so that it quickly knows if it has any switches or cells sites that are not functioning properly. While AT&T Mobility designs its network to include the ability to re-route traffic around damaged network facilities, it should be noted that wireless carriers remain dependent on the wireline network for voice and data circuits that provide connectivity between the cell site and the switch, from switch to switch, and between the wireless network and the landline network. AT&T Mobility has available backup microwave equipment to connect sites to the switching center in the even of a long term outage of leased landline facilities.

D. AT&T Mobility Complies with the Applicable Consumer Protection and Service Quality Requirements

AT&T certifies that it will satisfy applicable consumer protection and service quality standards. NDAC §69-09-05-12(3)(d) requires that a wireless ETC carrier must commit to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service (“Code”). AT&T Mobility is committed to fulfilling the obligations set forth in the CTIA Code throughout its ETC designated service area. Specifically, the CTIA Code requires: disclosure of rates and terms of service to customer; make available maps showing where service is generally available; provide contract terms to customers and confirm

²¹ Not all cell sites are appropriate for generators.

changes in service; allow not less than a 14 day return period for new service; provide specific disclosures in advertising; separately identify carrier charges from taxes on billing statements; provide customers with the right to terminate service for material changes in contract terms; provide ready access to customer service; promptly respond to consumer inquires and complaints; and, abide by polices for protection of customer privacy. On an annual basis AT&T Mobility completes a certification process with CTIA.

In addition to those items listed in the CTIA Code, AT&T Mobility has instituted other consumer-friendly measures. For example, AT&T Mobility has developed the Customer Service Summary (“CSS”) which summarizes for each customer important elements of his or her service, such as calling plan details, first bill and ongoing bill estimator, a listing of important standard charges, and some of AT&T Mobility’s policies.

E. Local Usage Comparable to the ILEC

NDAC §69-09-05-12(3)(e) requires that an ETC applicant demonstrate that it offers a local usable plan comparable to the one offered by the incumbent LEC (“ILEC”) in the proposed designated service area.

AT&T Mobility is committed to providing its customers with valuable calling plans that are comparable in value to those offered by the ILEC. 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. For example, the AT&T Nationsm and AT&T FamilyTalksm calling plans do not assess additional charges for long distance within the United

States.²² The AT&T Nationsm and AT&T FamilyTalksm calling plans also include numerous features at no additional charge, such as: Voicemail, Caller ID, Call Forwarding, Call Waiting, and Three-Way Calling. These calling plans also include either unlimited nights and weekend minutes or generous night and weekend minute packages. The AT&T Nationsm and AT&T FamilyTalksm calling plans also include either unlimited nights and weekend minutes or generous night and weekend packages, and allow customers to Rollover unused minutes for use in subsequent months. As such these calling plans provide customers with local usage that, when taking into account all of the additional benefits of AT&T Mobility's service offerings, are comparable to the ILEC's calling plans.²³

F. Provide Equal Access

Pursuant to NDAC §69-09-05-12(3)(f), AT&T Mobility certifies that it acknowledges that the FCC may require it to provide customers with equal access to long distance carriers in the event that no other ETC is providing equal access within its ETC Designated Area.

G. Granting AT&T Mobility's Application for ETC Designation is in the Public Interest

Pursuant to NDAC § 69-09-05-12(5), prior to designating an ETC the Commission shall determine that such designation is in the public interest. The Commission shall "consider the benefits of increased choice and the unique advantages and disadvantages of the applicant's service offering." Further, if the applicant requests designation below the study area level of a rural telephone company, the commission must consider conduct a cream-skimming analysis and

²² AT&T Mobility is currently offering Alltel's postpaid rate plans to subscribers in North Dakota. Once the AT&T Mobility network is available in North Dakota, which should occur during the second quarter of this year, customers will have access to the AT&T Nationsm and AT&T FamilyTalksm calling plans.

²³ In addition to calling plans that will be offered by AT&T Mobility, former Alltel customers may retain their calling plan if they do not make any changes to their account. In addition, customers on tribal lands may have an additional rate plan available to them.

consider other factors. While AT&T Mobility is seeking ETC designation in rural areas, it is not seeking designation for less than the entire study area for rural telephone company. As such, a cream-skimming analysis is not required.

AT&T Mobility's ETC designation will bring improved coverage and service quality to its ETC Designated Area in North Dakota. With federal high-cost support, AT&T Mobility will construct, operate, and maintain communications infrastructure to improve coverage and enhance wireless call quality. In accordance with the Commission's ETC designation requirements, AT&T Mobility will follow the service improvement plan submitted as **Confidential Exhibit E**. AT&T Mobility has previous experience with the federal high-cost support program as it has already been designated as an ETC in 15 other states/territories.²⁴

Although wireless data service is not by itself a supported service under the FCC's current rules, the availability of mobile data service on AT&T Mobility's network is a public interest benefit to subscribers of AT&T Mobility's universal service offering. For example, AT&T Mobility is building a broadband wireless network in North Dakota and is transitioning former Alltel subscribers to this network.²⁵ Further, AT&T Mobility's customers will enjoy the advantages of AT&T Mobility's network technology. AT&T Mobility's network will allow customers to simultaneously use voice and data. AT&T Mobility's customers will have the advantage of picking from an unprecedented selection of handsets and devices to meet their needs. Also, AT&T Mobility's customers will be able to roam with their handset in over 200 countries.

²⁴ AT&T Mobility has been designated as an ETC in Alabama, Alaska, Arkansas, Idaho, Kentucky, Louisiana, Michigan, Mississippi, Oregon, Puerto Rico, Texas, Virginia, Washington, West Virginia, and Wisconsin.

²⁵ The AT&T Mobility wireless broadband network should become available to consumers in North Dakota during the second quarter of this year.

In addition to providing consumers with the benefits of increased choice and competition, there are other advantages to designating AT&T Mobility as an ETC. For example, AT&T Mobility will be able to offer its Lifeline Calling Plan within its ETC Designated Area thereby providing potential Lifeline customers with a choice for Lifeline service.

High-Cost Certification

Under FCC Rule Sections 54.313 and 54.314, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, self-certify to the FCC and the Universal Service Administrative Corporation ("USAC") that the carrier will comply with Section 254(e) of the Federal Telecommunications Act of 1996.²⁶

In support of its request, AT&T Mobility hereby certifies that it will utilize all federal high-cost universal service support that it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to 47 U.S.C. 254(e).

VIII. Certificate in Support of Application

Attached hereto is an Certificate of Hardmon Williams III, Vice President/General Manager for AT&T Mobility, verifying the accuracy of the facts contained herein.

²⁶ 47 C.F.R. §§ 54.313, 54.314.

X. CONCLUSION:

WHEREFORE, pursuant to Section 214(e)(2) of the Act, AT&T Mobility respectfully requests that the Commission enter an order designating New Cingular Wireless PCS, LLC as an ETC for the ETC Designated Area set forth in **Exhibit A**.

Dated: 3-22-11

Respectfully submitted,

NEW CINGULAR WIRELESS PCS, LLC

By:  _____

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Telecommunications Carrier)

CERTIFICATION OF HARDMON WILLIAMS III

I, the undersigned, Hardmon Williams III, do hereby certify as follows:

1. I serve as Vice President and General Manager for AT&T Mobility LLC, and its subsidiary New Cingular Wireless PCS, LLC (“AT&T Mobility”).
2. This Certification is submitted in support of AT&T Mobility’s Application for Designation as an Eligible Telecommunications Carrier (“Application”).
3. I declare that I have reviewed the Application and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.
4. I further declare that the federal high cost universal service support received by AT&T Mobility will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.

I certify that the foregoing is true and correct to the best of my knowledge, information and belief.



Hardmon Williams III
Vice President/General Manager
Minnesota/Northern Plains Market

Signed at Bloomington, Minnesota

March 21, 2011

EXHIBIT A

AT&T MOBILITY DESIGNATED SERVICE AREA

Exhibit A

Non-Rural Wire Centers:

Qwest Corp ND – Study Area Code (“SAC”) 385144

BLFDNDBC
BSMRNDBC
CSLTNDBC
DCSNDBC
FARGNDBC
GDFRNDBC
GFABNDBC
GFTNDBA
GRNRNDBC
HLBONDBC
HTTNDBC
JMTWNDBC
KNDRNDBC
LNRDNMW
LRMRNDBA
MANVNDBC
MINTNDBA
MNDNDBA
MYVLNDBC
NWODNDBC
RYNLNDBC
THSNDBC
VLCYNDBC
WFRGNDBC
WHTNDBC

Rural Incumbent Local Exchange Study Areas:²⁷

BEK Comm. Coop – SAC 381604

HZTNNDXA
LEHRNDXA
LNTNNDXA
MNKNNDAB
NPLNNDXA
PTTBNDXA
RBSNNDXA
REGNNDXA
STBGNDXA
STELNDXA
TAPPNDXA
TUTLNDXA
WINGNDXA
WLTONDXA
WSHKNDXA
ZELDNDXA

Consolidated Telcom – SAC 381607

AMDNNDXA
BWMNNDXA
DNCTNDXA
DODGNDXA
GRBTNDXA
HLDYNDXA
HTNGNDXA
KLDRNDXA
LADDNDXA
MNNGNDXA
MOTTNDXA
NELDNDXA
RCHDNDXA
RDERNDXA
RGNTNDXA
RHMENDXA
SCTNNDXA
SHRTNDXA

Dakota Central Coop – SAC 381610

BWDNNDXA
CGTNNDXA
CRTYNDXA

²⁷ AT&T Mobility is seeking designation in the entire rural incumbent local exchange study areas located in North Dakota. Some of the SACs listed in this section may include wire centers in adjacent states; AT&T Mobility has not listed those wire centers outside of North Dakota.

EDMNNDXA
GCKLNDXA
GRCYNDXA
MEDNNDXA
STRTNDXA
SYKSNDXA
WDWONDXA
YPSLNDXA

Dickey Rural Coop – SAC 381611

ASHYNDXA
EDGLNDXA
ELDLNDXA
KULMNDXA
LSBNDBC
OAKENDXA
VNTRNDXA

Griggs County Tel Co – SAC 381615

BNFRNDXA
CPTWNDXA
FNLYNDXA
MCHNNDXA

Inter-Community Tel – SAC 381616

ALICNDXA
BFLONDXA
DAZYNDXA
HNFNDXA
HOPENDXA
NOMENDXA
PAGENDXA
SNBRNDXA
TWCYNDXA

Midstate Comm. – SAC 381638

BECHNDXA
YORKNDXA

Midstate Tel Co – SAC 381617

MEDRNDXA
PRTLNDXA
STNLNDXA

North Dakota Tel Co – SAC 381447

BALTNDXA
CANDNDXA

CRRYNDXA
DRAKNDXA
DVLKNDXA
ESMDNDXA
FSNDNDXA
FTTTNDXA
HRVYNDXA
KNOXNDXA
LEDSNDXA
MCVLNDXA
MDCKNDXA
MNWKNDXA
NWRKNDXA
PEKNNDXA
PENNDXA
RBYNDXA
SHYNDXA
STRKNDXA
TOLNDXA
WBSTNDXA
WRWKNDXA

Northwest Communications Cooperative – SAC 381625

ALAMNDXA
BWBLNDXA
CLMBNDXA
CRSBNDXA
EPNGNDXA
FLXTNDXA
GRENNDXA
LGNTNDXA
MCGRNDXA
MRMNNDXA
NONANDXA
PWLKNDXA
RAY NDXA
RDPRNDXA
TIOGNDXA
WLDRNDXA

Polar Comm Mut Aid – SAC 381630

ANTANDXA
ARTHNDXA
BRCKNDXA
CRYSNDXA
CVLRNDXA
DHLNNDXA
DYTNNDXA
EDBGNDXA
FADLNDXA

GLBGNDXA
HNTRNDXA
HPLENDXA
INKSNDXA
LNKNNDXA
MCGNNDXA
NCHENDXA
NEKMNDXA
NGRANDXA
PKRVND01
PTBGNDXA
STTMNDXA

Polar Telecomm – SAC 381614

ADMSNDXA
EDMRNDXA
FDVLNDXA
GLBYNDXA
LAKTNDXA
PMBNNDXC

Red River Rural Tel – SAC 381631

ABRCNDXA
CLFXNDXA
FAMTNDBC
GRTBNDXA
HKSNDXA
LGWDNDXA
MRTNNDXA
WYNDNDBA

Reservation Tel Coop – SAC 381632

ALXNNDXA
ARNGNDXA
DGLSNDXA
EMMTNDXA
GRSNNDXA
KEENNDXA
KNMRNDXA
MAX NDXA
MKTINDXA
MNDRNDXA
NORMNDXA
NWTWNDXA
PLAZNDXA
PRSHNDXA
ROSSNDXA
RSGLNDXA
RYDRNDXA
SPNCNDXA

SQGPNDXA
WTCYNDXB

SRT Communications – SAC 383303

ANTLNDXA
BRTHNDXA
BUTTNDXA
CRPONDXA
DELCNDXA
DNYBNDXA
DRNGNDXA
GLBNNDXA
KRLSNDXA
LNDANDXA
LNFRNDXA
MARTNDXA
MHLLNDXA
MNABNDXA
MNOTNDXA
MTGSNDXA
MXBSNDXA
NWBGNDXA
SHWDNDXA
SPRRNDXA
SWYRNDXA
TOLYNDXA
TWNRRNDXA
UPHMNDXA
VLVANDXA
WHOPNDXA

United Tel Mutual – SAC 381636

BISBNDXA
BTNUNDXA
DNSTNDBC
KRMRNDXA
LNGDNDXA
MLTNNDXA
MNCHNDXA
RCLKNDXA
RLTENDXA
ROLLNDBC
SORSNDXA
SRLSNDXA
WALSNDXA
WLCYNDXA
WLHLNDXA

W. River Telecom. – SAC 381637

BELHNDXA

CNTRNDXA
CRSNNDXA
ELGNNDXA
FLSHNDXA
FTYTNDXA
GDRCNDXA
GLNLNDXA
GLVYNDXA
HAZNNDXA
HBRNNDXA
MCCSNDXA
MCLGSDXA
MRCRNDXA
NWSLNDXA
PKCYNDXA
SLRGNDXA
SNTNNDXA
STATNDXB
TRLKNDXA
UNWDNDXA
WSBNNDXA
ZAP NDXA

Wolverton Tel Co. – SAC 381509
WLCTNDXA

Halstad Tel Co – SAC 361401
CLMXMNXC
HLSTMNXH
NLVLMNXN
SHLYMNXS

EXHIBIT B
MAP OF ETC DESIGNATED AREA

North Dakota Proposed ETC Area

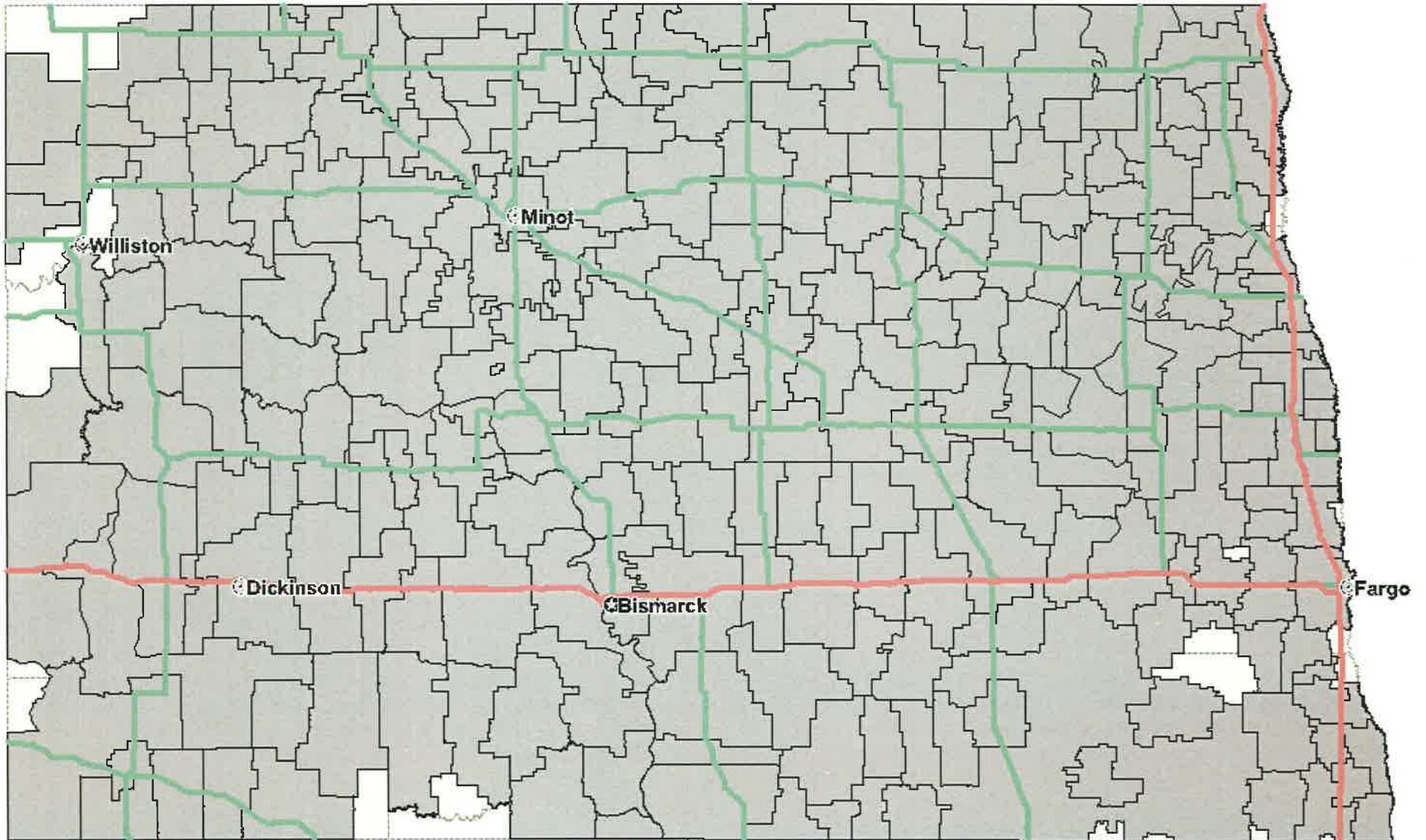


EXHIBIT C

C-1: AT&T Nation Calling Plan Brochure

AT&T Nation® Calling Plans

Select your monthly Voice Minutes, Messaging and Data Plans

—for domestic use only



AT&T Advantages

- Rollover Minutes*—only AT&T lets you keep your unused minutes
- Unlimited Calling to Any Mobile Number†
- Unlimited Nights & Weekends
- Unlimited A-List™ Calling to any 5 numbers on any network
- Ranked #1 in customer satisfaction among Smartphone owners
- Best selection of Smartphones

	Monthly
Step 1: Choose Your Voice Minute Plan	
UNLIMITED Nationwide Calling	\$69 ⁹⁹
900 Minutes with Rollover* plus Unlimited A-List™ Calling to any 5 numbers, Unlimited Mobile to Mobile and Unlimited Night & Weekend Minutes. 40c/add'l min	\$59 ⁹⁹
450 Minutes with Rollover* plus Unlimited Mobile to Mobile and 5000 Night & Weekend Minutes. 45c/add'l min	\$39 ⁹⁹
Step 2: Choose Your Messaging Plan	
Messaging UNLIMITED Messaging UNLIMITED and UNLIMITED Calling to Any Mobile Number. PLUS: UNLIMITED calling to any mobile number on any network in the U.S., PR and USVI.†	\$20
Messaging 1000 1000 Messages with Anyone on Any Network in the U.S. 10c/add'l msg	\$10
Step 3: Choose Your Data Plan	
Smartphones	
DataPro 2GB for the freedom to use all your Apps, Email, Web, Social Networking and more. Plus, get unlimited Wi-Fi usage on the AT&T national Wi-Fi network. \$10/1GB add'l data	\$25
DataPlus 200MB for Email, Web and Social Networking. Plus, get unlimited Wi-Fi usage on the AT&T national Wi-Fi network. \$15/200MB add'l data	\$15
Quick Messaging & Basic Phones	
Data UNLIMITED Unlimited Web, Search, Email, Social Networking and more. Plus, get access to Apps, Music and More. Messaging Unlimited plan required. \$15/mo if purchased without Messaging Unlimited plan.	\$10

*Mobile to Any Mobile: Messaging Unlimited Plan required. Available on select AT&T Nation & FamilyTalk plans. International and roaming calls not included. Not available on AT&T Viva Mexico or Nation with Canada plans. Calls to directory assistance, voicemail, pay-per-use, call routing and forwarding numbers not included. Text, picture, video and instant messages must be sent to and/or received from within the AT&T nationwide coverage area. Smartphones require a minimum \$15 data plan. **Additional Data:** On DataPro/DataPlus plans for Smartphone, DataPro has an initial data allowance of 2GB. DataPlus has an initial data allowance of 200MB. If you exceed your initial data allowance, you will automatically be provided: (a) another 1GB for DataPro and be charged an additional \$10 for each additional 1GB provided or (b) another 200MB for DataPlus and be charged an additional \$15 for each additional 200MB provided. All data allowances, including overages, must be used in the billing period in which the allowance is provided or they will be forfeited. **Pay-Per-Use (PPU) Charges:** Text Messages — \$20/message; Picture/Video Messages — \$30/message; Int'l Roaming Data & MSG PPU Charges: \$0.0195 for each kilobyte used, except Canada which is \$0.015 per kb; and, \$0.50/Text Message sent, \$1.30/Picture or Video Message sent. Standard domestic rates apply to incoming messages. PPU Charges for int'l messages sent from U.S.: 25c for Text Messages and 50c for Picture/Video Messages. **Wi-Fi:** Wi-Fi enabled device required. Wi-Fi access includes AT&T Wi-Fi Basic. Other restrictions apply. See attwifi.com for details and locations.

For full terms and conditions of service, please see a sales representative or visit www.att.com/wirelessterms. All prices are billed monthly and are valid for use in the U.S. New one- or two-year service agreement may be required. \$36 Activation Fee for each new line. Prices are subject to change. Prices do not include taxes. In addition to the monthly cost of the rate plan and any selected features, AT&T imposes the following charges: (1) a Regulatory Cost Recovery Charge of up to \$1.25 to help defray its cost incurred in complying with obligations and charges imposed by state and federal telecom regulations, (2) a gross receipts surcharge, (3) state and federal universal service charges, and (4) other government assessments on AT&T. These fees are not taxes or government-required charges. Rollover Minutes start accumulating with your second bill cycle. Additional software, hardware and/or subscription may be required for certain features. No service discounts are eligible on Unlimited Calling plans. Additional charges and device restrictions apply for access to corporate email/intranet sites and business applications. **A-List:** Available only with select rate plans. Numbers must be entered online at MyWireless Account at att.com/Mywireless. You can only select domestic landline or wireless numbers as your A-List numbers. Certain of these numbers, such as pay-per-call, directory assistance, voicemail access, call routing numbers, and your own wireless number, may not be selected for A-List. For a list of prohibited numbers and additional terms, see att.com/plantterms. Mobile to Any Mobile Calling available on Nation 450 or 900 minute plans when you purchase Unlimited Messaging for \$20.

personal Wi-Fi hotspot on the go

Connect to the Internet with multiple devices at once

DataPro 4GB with Tethering | **\$45** Per 4GB

Additional Data – \$10/1GB

4G available for tethering and Smartphone data use. \$45 price point is inclusive of \$25/2GB data plan for Smartphones.



Introducing UNLIMITED Calling to Any Mobile Number*

FREE when you purchase \$20 Unlimited Messaging



+ Step 4: Choose Your Features

AT&T Navigator®

Voice and on-screen turn-by-turn directions. Traffic alerts with 1-click rerouting. Automatically receive the latest maps and traffic updates.

First 30 Days FREE

\$9.99

Per Month Thereafter

Limited time offer. See below for details.



AT&T Smart Limits for Wireless™ \$4.99/mo

Good for you, good for your kids. Set monthly limits for Web Browsing, Text Messages and mobile purchases. Control hours of use, block unapproved numbers and more.

Mobile Insurance \$4.99/mo

Includes coverage for lost, stolen or accidentally damaged phones, as well as mechanical or electrical failure after the manufacturer's warranty has expired. Apple® iPhone® models do not qualify.

Early Nights & Weekends \$8.99/mo

Unlimited calls from 7 p.m. to 7 a.m.

AT&T Roadside Assistance \$2.99/mo

Help is just a phone call away – 24/7. We provide assistance with towing, dead batteries, lock-outs, fuel delivery and flat tires.

AT&T World Connect® \$3.99/mo

Low international long distance rates apply to calls from the U.S. to more than 220 countries.

AT&T U-verse® Mobile

Download and watch hit TV shows on your Windows® Phone with U-verse® Mobile.



Phones can be used to purchase goods, services and subscriptions from AT&T or others. Consider our Data Plans, Smart Limits and Parental Controls.

Terms Applicable to Features: Certain features will not be available in all areas at all times. **AT&T Navigator:** Cancel within 30 days or be automatically subscribed at monthly rate shown. To cancel, you can visit the My Accounts portal on your handset or call AT&T customer support. Standard data and messaging charges apply when using AT&T Navigator. **Smart Limits:** See Smart Solutions brochure or visit att.com/wirelessmartlimitsterms for terms. **Mobile Insurance:** The Mobile Insurance program is underwritten by Continental Casualty Company, a CNA company (CNA), and administered by Asurion Protection Services, LLC (Asurion Protection Services Insurance Agency, LLC CA Lic#0D63161), a licensed agent of CNA. May not be available in all states. Claims may be fulfilled with new or remanufactured replacement equipment. Dependent on phone model, each replacement is subject to a non-refundable \$50 or \$125 deductible. See a Mobile Insurance brochure for complete Terms and Conditions of coverage, available at any of our participating AT&T retail locations or att.com/mobileinsurance. Eligibility varies by device. Terms and Conditions are subject to change. **Roadside Assistance:** Costs \$2.99/month per enrolled phone and is automatically billed to your account. You may cancel at any time. Roadside Assistance service is provided for wireless customers of AT&T by Asurion Roadside Assistance Services, LLC, a licensed motor club. Refer to the Roadside Assistance Welcome Kit for complete Terms and Conditions. **AT&T World Connect:** See international coverage map at stores for details. Restrictions apply. Rates and available countries subject to change. Airtime or roaming charges are in addition to long distance charges. For more information, see AT&T World Brochure. **U-verse Mobile:** Pay-per-month download and watch available for select shows and requires select Smartphones, Wi-Fi connection and monthly subscription fee. Standard data charges may apply. Unless required by your device, plans may be canceled at any time. **Data Plans:** Streaming Video and Music Applications require a data plan. Additional subscription and download charges may apply.

Rethink Possible 



Check coverage in your area at wireless.att.com/coverage-viewer.

Mobile Broadband not available in all areas. Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included in and out of plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from map graphics, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber.



**att.com/wireless
1-866-MOBILITY (1-866-662-4548)**

**For deaf/hard of hearing customers:
(TTY) 1-866-241-6567**

**Questions on accessibility by persons with disabilities:
1-866-241-6568**



EXHIBIT C

C-2: Family Talk Calling Plan Brochure

AT&T FamilyTalk® Calling Plans

Select your monthly Voice Minutes, Messaging and Data Plans

—for domestic use only

Rethink Possible



AT&T Advantages

- Rollover Minutes®—only AT&T lets you keep your unused minutes
- Unlimited Calling to Any Mobile Number†
- Unlimited Nights & Weekends
- Unlimited A-List™ Calling to any 10 numbers on any network
- Ranked #1 in customer satisfaction among Smartphone owners
- Best selection of Smartphones

*Mobile to Any Mobile: Messaging Unlimited Plan required. Available on select AT&T Nation & FamilyTalk plans. International and roaming calls not included. Not available on AT&T Viva Mexico or Nation with Canada plans. Calls to directory assistance, voicemail, pay-per-use, call routing and forwarding numbers not included. Text, picture, video and instant messages must be sent to and/or received from within the AT&T nationwide coverage area. Smartphones require a minimum \$15 data plan. FamilyTalk plans can add up to 3 additional lines. Additional Data: On DataPro/DataPlus plans for Smartphone, DataPro has an initial data allowance of 2GB. DataPlus has an initial data allowance of 200MB. If you exceed your initial data allowance, you will automatically be provided: (a) another 1GB for DataPro and be charged an additional \$10 for each additional 1GB provided or (b) another 200MB for DataPlus and be charged an additional \$15 for each additional 200MB provided. All data allowances, including overages, must be used in the billing period in which the allowance is provided or they will be forfeited. Pay-Per-Use (PPU) Charges: Text Messages — \$.20/message; Picture/Video Messages — \$.30/message. Int'l Roaming Data & MSG PPU Charges: \$0.0195 for each kilobyte used, except Canada which is \$0.015 per kb; and, \$0.50/Text Message sent, \$1.30/Picture or Video Message sent. Standard domestic rates apply to incoming messages. PPU Charges for int'l messages sent from U.S.: 25¢ for Text Messages and 50¢ for Picture/Video Messages. Wi-Fi: Wi-Fi enabled device required. Wi-Fi access includes AT&T Wi-Fi Basic. Other restrictions apply. See attwifi.com for details and locations.

For full terms and conditions of service, please see a sales representative or visit www.att.com/wirelessterms.

All prices are billed monthly and are valid for use in the U.S. New one- or two-year service agreement may be required. \$36 Activation Fee for each new line. Prices are subject to change. Prices do not include taxes. AT&T also imposes monthly a Regulatory Cost Recovery Charge of up to \$1.25 to help defray costs incurred in complying with State and Federal telecom regulations; State and Federal Universal Service Charges; and surcharges for customer-based and revenue-based state and local assessments on AT&T. These are not taxes or government-required charges. Rollover Minutes start accumulating with your second bill cycle. Unless you purchase an eligible Tethering plan, tethering is prohibited. Additional software, hardware and/or subscription may be required for certain features. No service discounts are eligible on Unlimited Calling plans. Additional charges and device restrictions apply for access to corporate email/intranet sites and business applications. A-List: Available only with select rate plans. Numbers must be entered online at MyWireless Account at att.com/MyWireless. You can only select domestic landline or wireless numbers as your A-List numbers. Certain of these numbers, such as pay-per-call, directory assistance, voicemail access, call routing numbers, and your own wireless number, may not be selected for A-List. For a list of prohibited numbers and additional terms, see att.com/plantterms. Mobile to Any Mobile Calling available on FamilyTalk 2100, 1400, or 700 minute plans when you purchase Unlimited Messaging for \$30.

	Monthly	Add'l Lines
Step 1: Choose Your Voice Minute Plan	(Includes 2 lines)	
UNLIMITED Nationwide Calling	\$119 ⁹⁹	\$49 ⁹⁹
2100 Minutes with Rollover* plus Unlimited A-List™ Calling to any 10 numbers, Unlimited Mobile to Mobile and Unlimited Night & Weekend Minutes. 35c/add'l min	\$109 ⁹⁹	\$9 ⁹⁹
1400 Minutes with Rollover* plus Unlimited A-List™ Calling to any 10 numbers, Unlimited Mobile to Mobile and Unlimited Night & Weekend Minutes. 40c/add'l min	\$89 ⁹⁹	\$9 ⁹⁹
700 Minutes with Rollover* plus Unlimited Mobile to Mobile and Unlimited Night & Weekend Minutes. 45c/add'l min	\$69 ⁹⁹	\$9 ⁹⁹
Step 2: Add Messaging for the Family		
Messaging UNLIMITED for Families Messaging Unlimited and Unlimited Calling to any mobile number for up to 5 lines on your FamilyTalk account. PLUS: UNLIMITED calling to any mobile number on any network in the U.S., PR and USVI.†	\$30	
Step 3: Choose Your Data Plan	(Per line)	
Smartphones		
DataPro 2GB for the freedom to use all your Apps, Email, Web, Social Networking and more. Plus, get unlimited Wi-Fi usage on the AT&T national Wi-Fi network. \$10/1GB add'l data	\$25	
DataPlus 200MB for Email, Web and Social Networking. Plus, get unlimited Wi-Fi usage on the AT&T national Wi-Fi network. \$15/200MB add'l data	\$15	
Quick Messaging & Basic Phones		
Data UNLIMITED Unlimited Web, Search, Email, Social Networking and more. Plus, get access to Apps, Music and More. Messaging Unlimited plan required. \$15/mo if purchased without Messaging Unlimited plan.	\$10	

personal Wi-Fi hotspot on the go

Connect to the Internet with multiple devices at once

DataPro
4GB with
Tethering

\$45 Per
4GB

Additional Data – \$10/1GB

4G available for tethering and Smartphone data use. \$45 price point is inclusive of \$25/2GB data plan for Smartphones.



Step 4: Choose Your Features

AT&T Navigator®

Voice and on-screen turn-by-turn directions. Traffic alerts with 1-click rerouting. Automatically receive the latest maps and traffic updates.

First
30 Days
FREE

\$9.99

Per Month Thereafter

Limited time offer.
See below for details.



AT&T Smart Limits for Wireless™ \$4.99/mo

Good for you, good for your kids. Set monthly limits for Web Browsing, Text Messages and mobile purchases. Control hours of use, block unapproved numbers and more.

Mobile Insurance \$4.99/mo

Includes coverage for lost, stolen or accidentally damaged phones, as well as mechanical or electrical failure after the manufacturer's warranty has expired. Apple® iPhone® models do not qualify.

Early Nights & Weekends \$16.99/mo

Unlimited calls from 7 p.m. to 7 a.m. for all lines in your group.

AT&T Roadside Assistance \$2.99/mo

Help is just a phone call away – 24/7. We provide assistance with towing, dead batteries, lock-outs, fuel delivery and flat tires.

AT&T World Connect® \$3.99/mo

Low international long distance rates apply to calls from the U.S. to more than 220 countries.

Phones can be used to purchase goods, services and subscriptions from AT&T or others. Consider our Data Plans, Smart Limits and Parental Controls.

Terms Applicable to Features: Certain features will not be available in all areas at all times. **AT&T Navigator and AT&T FamilyMap:** Cancel within 30 days or be automatically subscribed at monthly rate shown. To cancel, you can visit the My Accounts portal on your handset or call AT&T customer support. Standard data and messaging charges apply when using AT&T Navigator or AT&T FamilyMap. **Smart Limits:** See Smart Solutions brochure or visit att.com/wirelessmartlimits/terms for terms. **Mobile Insurance:** The Mobile Insurance program is underwritten by Continental Casualty Company, a CNA company (CNA), and administered by Asurion Protection Services, LLC (Asurion Protection Services Insurance Agency, LLC CA Lic#0D63161), a licensed agent of CNA. May not be available in all states. Claims may be fulfilled with new or remanufactured replacement equipment. Dependent on phone model, each replacement is subject to a non-refundable \$50 or \$125 deductible. See a Mobile Insurance brochure for complete Terms and Conditions of coverage, available at any of our participating AT&T retail locations or att.com/mobileinsurance. Eligibility varies by device. Terms and Conditions are subject to change. **Roadside Assistance:** Costs \$2.99/month per enrolled phone and is automatically billed to your account. You may cancel at any time. Roadside Assistance service is provided for wireless customers of AT&T by Asurion Roadside Assistance Services, LLC, a licensed motor club. Refer to the Roadside Assistance Welcome Kit for complete Terms and Conditions. **AT&T World Connect:** See international coverage map at stores for details. Restrictions apply. Rates and available countries subject to change. Airtime or roaming charges are in addition to long distance charges. For more information, see AT&T World Brochure. **U-verse Mobile:** Pay-per-month download and watch available for select shows and requires select Smartphones, Wi-Fi connection and monthly subscription fee. Standard data charges may apply. Unless required by your device, plans may be canceled at any time. **Data Plans:** Streaming Video and Music Applications require a data plan. Additional subscription and download charges may apply. \$10 Data Unlimited plan available only with current FamilyTalk rate plans and Messaging Unlimited for Families.

Introducing UNLIMITED Calling to Any Mobile Number*

FREE when you purchase \$30 Unlimited Messaging



AT&T U-verse® Mobile

Download and
watch hit TV shows
on your Windows®
Phone with
U-verse® Mobile.



Rethink Possible





Check coverage in your area at wireless.att.com/coverage-viewer.

Mobile Broadband not available in all areas. Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included in and out of plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from map graphics, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber.



**att.com/wireless
1-866-MOBILITY (1-866-662-4548)**

**For deaf/hard of hearing customers:
(TTY) 1-866-241-6567**

**Questions on accessibility by persons with disabilities:
1-866-241-6568**



EXHIBIT D
EXAMPLE OF LIFELINE CALLING PLAN BROCHURE

Lifeline and Link Up: Washington

lifeline
service

Discounted service
for qualified customers

Lifeline

Lifeline offers you a discount on your monthly wireless bill, if you qualify.

Save Money With Lifeline

Lifeline service is just \$24.99 a month, which is then discounted depending on the federal and state support that's available in your area. Right now, you can save as much as \$8.25 each month with federal Lifeline discounting, and even more if you qualify for additional Lifeline discounts from your state.

If you live on Tribal Lands and qualify, you could get Enhanced Lifeline support, which can reduce your wireless bill to as little as \$1.

Qualifying for Lifeline

Requirements vary by state. If you live in a state that doesn't offer state Lifeline support, you may qualify for federal Lifeline benefits if your household income is at or below 135% of the *Federal Poverty Guidelines (FPG)*, or you participate in any of these programs:

- Medicaid (not Medicare)
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) (Section 8)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)

Customers seeking to qualify for program benefits under the income-based standards are required to provide written documentation of their household income.

If you live on Tribal Lands, you could also qualify for Enhanced Lifeline support if you meet the above requirements or participate in any of these programs:

- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Administered Temporary Assistance for Needy Families (Tribal TANF)
- Tribal Administered National School Lunch Program (Tribal NSLP)
- Tribal Administered Head Start (meeting income qualifying standards)

If you live in a state that offers state Lifeline support, you must meet the criteria as defined in the state Lifeline and Link Up application form, which is available at <http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp> or by calling 1-800-377-9450.

Please note: You are responsible for notifying AT&T when you no longer meet the applicable eligibility requirements for the Program within (5) days of becoming aware of such ineligibility.

Program Restrictions

You are eligible for Lifeline support on one phone line based at your principal residence and billed to your name. You can get Link Up benefits only once at the same address. Those benefits can only be applied toward your Activation Fee, never toward your purchase of equipment. Finally, you can't apply your Link Up benefits to any activation charges you paid prior to signing up for the Lifeline and Link Up programs.

Signing Up

Just complete the Lifeline and Link Up Application form and certify that you participate in a qualifying government program or otherwise meet the eligibility standards. Mail the completed application to:

AT&T
ATTN: Contract Services
1215 W. Cherry St.
Vermillion, SD 57069

If you cannot access the application form from <http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp>, just call 1-800-377-9450 and an application will be mailed to you.

Applications that are not completely filled out, legible and signed will be returned.

link up

Link Up helps people who qualify for Lifeline support pay for their Activation Fee and/or any related installation charges. Link Up cost of \$36 will be waived.



Lifeline service for only \$24.99* per month

300 Anytime Minutes / 1000 Night & Weekend Minutes† and Nationwide Long Distance Included

*Additional discounts may apply, depending on the federal and state subsidy applicable in Washington.



AT&T Coverage Area

If you still have questions or would like to receive information by mail,

please call a Lifeline Customer Service Representative at 1-800-377-9450, Monday through Friday between the hours of 10:00 a.m. - 7:00 p.m. CST.

AT&T GSM handset required on Lifeline/Link Up plans.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included or excluded in your plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from the graphics shown in the map, and coverage may be affected by such things as terrain, weather, foliage, buildings and other obstructions, signal strength, customer equipment and other factors. AT&T does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber. Future coverage, if depicted above, is based on current planning assumption but is subject to change and has not yet been confirmed.

†The night and weekend periods are from 8:00 p.m. to 6:00 a.m. from Monday to Friday, and Saturdays and Sundays all day long. The anytime minutes used in long distance calls to the United States will be discounted from the plan. Originating international long distance calls will not be allowed. The roaming cost is \$0.25 per minute and anytime minutes used will be discounted from minutes included in the plan. International roaming is not available. No rollover can be made. The anytime minutes used in excess of the ones included in the plan will be charged at \$0.15 per minute. These are government programs that help people who comply with certain criteria to pay for their phone services and related fees. AT&T Mobility is offering these programs in limited locations. To determine if Lifeline and Link Up are available from AT&T Mobility at your principal residence, please contact a Lifeline Customer Service Representative at 1-800-377-9450.

Terms and Conditions: Lifeline and Link Up Service are subject to the terms and conditions found in the Terms of Service, Rate Plan, Sales Information and Lifeline and Link Up Contract. © 2010 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. Revised 07/2010.



servicio lifeline

Servicio con descuento para clientes que reúnan los requisitos

Lifeline

Lifeline ofrece un descuento en la factura mensual de telefonía móvil, para quienes cumplen con los requisitos.

Ahorra dinero con Lifeline

El servicio Lifeline cuesta sólo \$24.99 por mes, menos los descuentos que se apliquen según la asistencia federal y estatal que se ofrece en tu área. En este momento, puedes ahorrar hasta \$8.25 por mes con el descuento federal de Lifeline, e incluso más, si reúnes los requisitos para descuentos adicionales de Lifeline en tu estado.

Si vives en territorios tribales y cumples con los requisitos, podrías recibir la asistencia de Enhanced Lifeline para reducir el total de la factura de telefonía móvil y pagar hasta un mínimo de \$1.

Requisitos para Lifeline

Los requisitos varían según el estado. Si vives en un estado que no ofrece asistencia de Lifeline, es posible que reúnas los requisitos para recibir los beneficios federales de Lifeline si los ingresos de tu grupo familiar no superan el 135% de las Normas Federales de Pobreza (*Federal Poverty Guidelines* o *FGP*, por su sigla en inglés) o si participas en uno de estos programas:

- Asistencia médica Medicaid (no Medicare)
- Cupones para alimentos (Food Stamps)
- Ingresos complementarios de seguridad (Supplemental Security Income o SSI, por su sigla en inglés)
- Asistencia pública federal para vivienda pública (Federal Public Housing Assistance o FPHA, por su sigla en inglés), Artículo 8
- Programa de asistencia a hogares de bajos ingresos para gastos de energía (Low Income Home Energy Assistance o LIHEAP, por su sigla en inglés)
- Programa nacional de almuerzos escolares (National School Lunch Program o NSLP, por su sigla en inglés)
- Asistencia temporal a familias necesitadas (Temporary Assistance for Needy Families o TANF, por su sigla en inglés)

Se devolverán las solicitudes que no se reciban completas, sean ilegibles o no estén firmadas.

Se requiere que los clientes que buscan cumplir con los requisitos para obtener los beneficios del programa bajo las normas basadas en los ingresos proporcionen documentación escrita sobre los ingresos de su grupo familiar.

Si vives en territorios tribales, también podrías recibir los beneficios de Enhanced Lifeline si cumples con los requisitos anteriores o participas en uno de estos programas:

- Asistencia general de la Oficina para asuntos indígenas (Bureau of Indian Affairs o BIA, por su sigla en inglés)
- Asistencia temporal a familias necesitadas administrada a nivel tribal (Tribal Administered Temporary Assistance for Needy Families o Tribal TANF, por su sigla en inglés)
- Programa de almuerzos escolares administrado a nivel tribal (School Lunch Program o Tribal NSLP, por su sigla en inglés)
- Programa Head Start administrado a nivel tribal (con cumplimiento de los requisitos sobre ingresos)

Si vives en un estado que ofrece la asistencia de Lifeline, debes reunir los requisitos que se definen en el formulario

de solicitud de Lifeline y Link Up de dicho estado, que se puede consultar en <http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp> o al llamar al 1-800-377-9450.

Importante: el cliente es responsable de notificar a AT&T cuando ya no cumpla con los requisitos correspondientes para recibir los beneficios del Programa dentro de los cinco (5) días posteriores a tener conocimiento de tal inhabilitación

Restricciones del programa

Sólo se puede recibir la asistencia de Lifeline en una sola línea de teléfono, con base en tu residencia principal, facturada a tu nombre. Podrás recibir los beneficios de Link Up solamente una vez en la misma dirección. Esos beneficios se podrán aplicar solamente en el cargo de activación, nunca en la compra del equipo. Tampoco se pueden usar los beneficios de Link Up para pagar cargos de activación anteriores al momento en que te inscribiste en los programas Lifeline y Link Up.

Para inscribirte

Completa el formulario de solicitud de Lifeline y Link Up, y certifica que participas en uno de los programas gubernamentales seleccionados o que cumples con los requisitos necesarios. Envía la solicitud completa a:

AT&T
ATTN: Contract Services
1215 W. Cherry St.
Vermillion, SD 57069

Si no puedes tener acceso al formulario de solicitud en <http://www.wireless.att.com/about/community-support/lifeline-link-up.jsp>, llama al 1-800-377-9450 y te enviaremos uno por correo.

Se devolverán las solicitudes que no se reciban completas, sean ilegibles o no estén firmadas.

link up

El programa Link Up ayuda a las personas que cumplan con los requisitos para recibir los beneficios de Lifeline a pagar el cargo de activación o los cargos relacionados con la instalación. No se cobrará el costo de \$36 correspondiente a Link Up.



Servicio Lifeline a sólo \$24⁹⁹* por mes

Incluye 300 minutos a cualquier hora, 1000 minutos de noche y de fin de semana*, y larga distancia a nivel nacional

*Es posible que se apliquen otros descuentos, según el subsidio federal y estatal correspondiente a Washington.



■ Área de cobertura de AT&T

En caso de tener preguntas o si deseas recibir información por correo, comunícate con un representante del servicio al cliente de Lifeline al 1-800-377-9450, de lunes a viernes de 10:00 a.m. a 7:00 p.m. (hora central).

Para los planes Lifeline y Link Up se requiere un teléfono GSM de AT&T.

La información que aparece en la pantalla del teléfono no indica la tarifa que se cobrará. Es importante revisar el mapa de cobertura para ver las áreas que se incluyen en el plan. El mapa muestra una aproximación de la cobertura al aire libre. El mapa puede incluir áreas en las que otras compañías no activadas ofrecen sus servicios y es posible que represente el área para la cual se cuenta con licencia en lugar de una aprobación de cobertura. El área de cobertura real puede variar considerablemente de lo que muestran los gráficos del mapa por motivos del terreno, clima, árboles, edificios y densidad de construcción, interferencia de la señal, equipo del cliente y otros factores. AT&T no garantiza la cobertura. Los cargos dependen del lugar de donde se transmite y recibe la llamada, más no del lugar en donde se encuentra el suscriptor. La cobertura futura, en caso de represente arriba, se basa en suposiciones actuales de planificación, aunque se encuentra sujeta a cambio y aún no se ha confirmado.

Los períodos de noche y de fin de semana se extienden de 8:00 p.m. a 6:00 a.m. de lunes a viernes, y sábados y domingos durante las 24 horas. Los minutos de uso utilizados en las llamadas de larga distancia a los Estados Unidos se descuentan del plan. No está permitido efectuar llamadas de larga distancia internacional. El costo de roaming es de \$0.25 por minuto y los minutos de uso se descuentan de los minutos incluidos en el plan. No se ofrece servicio de llamadas internacionales. No se pueden triangular los minutos de mes a mes. Los minutos de uso que excedan la cantidad asignada en el plan se cobrará a \$0.25 por minuto. Estos programas gubernamentales ofrecen ayuda para pagar el servicio telefónico y cargos relacionados a personas que cumplen con ciertos requisitos. AT&T Mobility ofrece estos programas en lugares limitados. Para determinar si AT&T Mobility ofrece los servicios de Lifeline y Link Up en el lugar de residencia principal del suscriptor, llámate con un representante del servicio al cliente de Lifeline al 1-800-377-9450.

Términos y condiciones: el servicio de Lifeline y Link Up está sujeto a los términos y condiciones que aparecen en los **Términos de servicio**, el **Plan de tarifas**, la **Información de venta** y en el **Contrato de Lifeline y Link Up**. © 2010 AT&T Intellectual Property. Todos los derechos reservados. AT&T, el logotipo de AT&T y todos los otros nombres contenidos aquí son marcas comerciales de AT&T Intellectual Property y/o compañías afiliadas a AT&T. Actualizado julio de 2010.

EXHIBIT E

NETWORK IMPROVEMENT PLAN

PUBLIC VERSION – TRADE SECRET

PRIVATE INFORMATION REDACTED