



**STOLL
KEENON
OGDEN**

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099
www.skofirm.com

DOUGLAS F. BRENT
DIRECT DIAL: 502-568-5734
DIRECT FAX: 502-562-0934
douglas.brent@skofirm.com

May 8, 2012

RECEIVED

MAY - 9 2012

PUBLIC SERVICE
COMMISSION

Jeffrey DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

***RE: Petition of T-Mobile Central LLC and PowerTel/Memphis, Inc. for Conditional Designation as Eligible Telecommunications Carriers for the Purpose of Establishing Eligibility to Participate in the Mobility Fund Phase 1 Auction on September 27, 2012 at the Federal Communications Commission
Case No. 2012-00135***

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of T-Mobile's Supplement to its Petition for Conditional ETC status. This filing references the collateral FCC proceeding that effectively sets deadlines for Commission action in this matter.

Also, due to an assignment change within T-Mobile, Michele K. Thomas will not be representing the Petitioners before the Commission in this matter. Accordingly, we will not be filing a notice of admission to practice for her.

Please acknowledge receipt of this filing by placing your file-stamp on the extra copy and returning to me via the enclosed, self-addressed, postage paid envelope. Thank you.

Sincerely yours,

STOLL KEENON OGDEN, PLLC

Douglas F. Brent

DFB: jms
Enclosures

Cc: William Haas
Senior Corporate Counsel
T-Mobile

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAY - 9 2012

PUBLIC SERVICE
COMMISSION

In re the Matter of:

Petition of T-Mobile Central LLC and)
PowerTel/Memphis, Inc. for conditional designation)
as Eligible Telecommunications Carriers for the)
purpose of establishing eligibility to participate in the)
Mobility Fund Phase I Auction on September 27,)
2012 at the Federal Communications Commission)

CASE NO. 2012-00135

SUPPLEMENT TO PETITION FOR CONDITIONAL DESIGNATION

Petitioners T-Mobile Central LLC and PowerTel/Memphis, Inc. (collectively, “T-Mobile” or the “Company”) file this supplement to their Petition for Conditional Designation as Eligible Telecommunications Carriers in Areas Eligible for Federal Mobility Fund Phase I Support for the Purpose of Establishing Eligibility to Participate in the Mobility Fund Phase I Auction on September 27, 2012 at the Federal Communications Commission (filed April 9, 2012) (the “Petition”), in order to provide the Commission with information released by the Federal Communications Commission (“FCC”) on May 2, 2012, relating to (a) the due dates for short-form applications for eligibility to participate in the FCC’s Mobility Fund Phase I Auction (“Auction 901”) and (b) the areas in Kentucky that are eligible for Mobility Fund Phase I support.

When the FCC scheduled Auction 901 to begin on September 27, 2012, it did not set a deadline for short-form applications to participate or specify precisely which census blocks would be eligible for Mobility Fund Phase I support.¹ However, it has instructed parties contemplating applying for new ETC designations for purposes of participating in Auction 901

¹ See *Mobility Fund Phase I Auction Scheduled for September 27, 2012*, AU Docket No. 12-25, Public Notice – Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements, DA 12-121 (rel. Feb. 2, 2012).

to “act promptly to begin the process” and has “urged” the states to “process such applications in a timely fashion.”² Therefore, T-Mobile filed the Petition without this information, stating that it would provide it in a supplement when available.³

On May 2, 2012, the FCC released a public notice establishing filing requirements and other procedures for Auction 901 (“Public Notice”).⁴ The Public Notice establishes a two-week window in which carriers seeking to participate in the auction must file their short-form application with the FCC. The window opens on **June 27, 2012** and closes on July 11, 2012.⁵ The Public Notice reiterates the requirement that, in order to establish eligibility, an applicant’s short-form application must certify that it is designated an ETC in the areas for which it will seek support at the auction.⁶

The Public Notice also establishes the final list of unserved census blocks that are eligible for Mobility Fund Phase I support.⁷ The FCC has released the list (which is voluminous) via the Internet rather than attaching it to the Public Notice.⁸ The list includes 15,452 Kentucky census blocks, covering approximately 14,220 road miles and 203,149 residents in 94 counties, as eligible for support.⁹

² *USF/ICC Transformation Order*, FCC 11-161 at ¶ 390

³ Petition at 6, n. 14.

⁴ *Mobility Fund Phase I Auction Scheduled for September 27, 2012*, Au Docket No 12-25, Public Notice and Filing Requirements and Other Procedures for Auction 901, DA 12-641 (rel. May 2, 2012) (“*Public Notice*”). The FCC’s website for Auction 901 is available here:

http://wireless.fcc.gov/auctions/default.htm?job=auction_summary&id=901

⁵ *Id.* at para. 40-41.

⁶ *Id.* at paras. 83, 93. The *Public Notice* also reiterates that a party may participate with an ETC designation conditioned upon the party winning support in the auction. *Id.* at 94; see 54 C.F.R. § 54.1003(a).

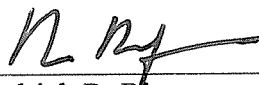
⁷ See *Public Notice* at para. 22.

⁸ See *id.* at Attachment A. The list of eligible census blocks, divided by state, is available here: http://wireless.fcc.gov/auctions/Auction_901_Attachment_A_May2012.htm.

⁹ The FCC spreadsheet listing eligible census blocks in Kentucky is available here: http://wireless.fcc.gov/auctions/901/KY_050212.xls.

May 8, 2012

Respectfully Submitted,

By: 
Kendrick R. Riggs
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
502-568-5734

Attorneys For
T-Mobile Central LLC and PowerTel/Memphis, Inc.