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CASE NO: 2008-00077

February 25, 2008

RECEIVED

FEB 26 2008
PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: AT&T Mobility Notice of Acquisition and Request for Transfer of ETC
Designation

Dear Ms. O'Donnell:

This is to notify the Kentucky Public Service Commission ("Commission") that on November 15, 2007, Dobson Communications Corporation ("Dobson") became a wholly owned subsidiary of AT&T Inc.¹ Due in part to operational reasons, AT&T intends to consolidate various Dobson legal entities with current AT&T entities. Specifically, AT&T intends to merge American Cellular Corporation ("ACC") into New Cingular Wireless PCS, LLC ("AT&T Mobility") effective in April.²

The Commission previously designated ACC as an eligible telecommunications carrier ("ETC") for the receipt of federal universal service support in certain rural and non-rural areas of Kentucky.³ For certain rural areas, the designation was conditioned on concurrence by the Federal Communications Commission's ("FCC") redefinition of certain study areas of the rural local exchange telephone company. ACC is currently designated as an ETC in the rural and non-rural areas set forth in Exhibit 1.

AT&T Mobility respectfully requests that the Commission transfer the ETC designation of ACC to AT&T Mobility for the receipt of federal universal service support for those areas in which ACC was previously designated as an ETC with the exception of those areas in KY-6 and KY-8 as set forth in Exhibit 2.⁴ AT&T Mobility is presently

¹ *In the Matter of Applications of AT&T Inc., and Dobson Communications Corporation, For Consent to Transfer Control of Licenses and Authorizations, File Nos. 0003092368 et al, WT Docket No. 07-153, ("FCC Dobson Merger Approval")* (rel. Nov. 19, 2007), ¶ 6.

² At that time, all customers on the ACC billing system will be transitioned to the AT&T Mobility billing system.

³ See Order dated August 15, 2005, *In the Matter of Petition of American Cellular Corporation Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Telecommunications Act*, Case No. 2005-00130.

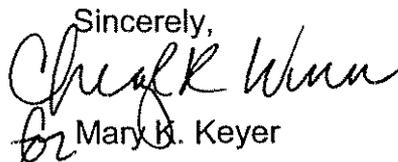
⁴ In *FCC Dobson Merger Approval*, ¶ 88, the FCC ordered that operating units in certain areas be divested including KY-6 and KY-8. ACC should remain as a designated ETC in these areas until ACC divests itself of these areas. At that time, ACC will file a withdrawal of ACC as a designated ETC in these areas.

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not an ETC in Kentucky for the purpose of receiving federal universal service support, and is requesting ETC designation be changed to AT&T Mobility for only those rural and non-rural areas set forth in Exhibit 2. After such time, all customers of AT&T Mobility in the ETC-designated areas will be included in the line counts for ETC designation. Further, AT&T Mobility will only be an ETC for the purpose of receiving federal universal service support.

Moreover, AT&T Mobility will continue to abide by the commitments made by ACC in its ETC application. Specifically, consistent with Section 214(e)(1) of the federal Communications Act ("Act") and Section 54.201(d) of the FCC's rules, AT&T Mobility will (1) offer the services that are supported by federal universal service support mechanisms⁵ either using their own facilities or a combination of their own facilities and resale of another carrier's services throughout the ETC designated areas upon reasonable request,⁶ and (2) advertise the availability of such services and the charges therefore using media of general distribution.⁷ In addition, AT&T Mobility will continue to participate in the federal Lifeline and Link Up programs in compliance with the FCC's requirements.⁸ Further, AT&T Mobility will continue to file with the Kentucky Commission plans for the use of high cost support to be received; records and documentation detailing AT&T Mobility's progress towards meeting its build-out plans; number of complaints per 1,000 handsets; and information detailing the number of unfulfilled requests for service for the past year.⁹

AT&T Mobility therefore respectfully requests that the Commission transfer the ETC designation of ACC for the receipt of federal universal service support to AT&T Mobility for those areas in which ACC was previously designated as an ETC and which the FCC did not order AT&T Mobility to divest as set forth in Exhibit 2.

Sincerely,

Mary K. Keyer

Enclosures

705361

⁵ The supported services include: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation for qualifying low-income consumers.

⁶ See ACC Designation Decision at 7.

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

⁸ See 47 C.F.R. § 54.411.

⁹ AT&T Mobility will follow the Commission's requirements and those in C.F.R. §54.202(a)(1)(B) to fulfill a reasonable request for service.

Exhibit 1

State	SAC	Carrier Study Area Name	WC Code	WC Name	MRKT
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLFDKYMA	BLOOMFIELD	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BRGNKYMA	BURGIN	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BRTWKYES	BARDSTOWN	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHPLKYMA	CHAPLIN	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HDBGKYMA	HARRODSBURG	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LRBGKYMA	LAWRENCEBURG	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NWHNKYMA	NEW HAVEN	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RSTRKYES	ROSE TERRACE	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLVSKYMA	SALVISA	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPFDKYMA	MOORESVILLE	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TYVLKYMA	TAYLORSVILLE	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WSBGKYMA	WILLISBURG	KY 4
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WSPNKYMA	WEST POINT	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BRVLKYXA	BRADFORDSVILLE	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CECLKYXA	CECILIA	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CMVLKYXA	CAMPBELLSVILLE	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	EZTWKYXA	COLUMBIA	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	GNBGKYXB	GREENSBURG	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	HGVLKYXA	HODGENVILLE	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LBNNKYXA	LEBANON	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LRTTKYXA	LORETTO	KY 4
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	SHDNKYXA	SOUTH HARDIN	KY 4
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	BFLOKYXA	BUFFALO	KY 4
KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	BSVLKYXR	BURKESVILLE1	KY 5
KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	FRPLKYXA	FAIRPLAY	KY 5
KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	JMTWKYXA	JAMESTOWN	KY 5
KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	RSSPKYXA	RUSSELLSPG	KY 5
KY	290565	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	PNKNKYXA	PINE KNOT	KY 5
KY	290565	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	STRNKYXA	STNSWHLYCY	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	ALBYKYXA	ALBANY	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BSVLKYXA	BURKESVILLE2	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CLMAKYXA	COLUMBIA	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	GLSGKYXA	GLASGOW1	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	MNTIKYXA	MONTICELLO	KY 5
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	TMVLKYXA	TOMPKINSVILLE	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	BOVLKYXA	BONNIEVL	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CNMRKYXA	CANMER	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CNTRKYXA	CENTER	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CVCYKYXA	CAVE CITY	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	EDTNKYXA	EDMONTON	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	FNRNKYXA	FOUNTANRUN	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GLSGKYXR	GLASGOW2	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GMLLYXA	GAMALIEL	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HRCVKYXA	HORSE CAVE	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HSVLYKYXA	HISEVILLE	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	LUCSKYXA	LUCAS	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MFVLKYXA	MUNFORDVL	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MGNLYKYXA	MAGNOLIA	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	SMSHKYXA	SUMMERSHAD	KY 5
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	TMHLKYXA	TEMPLEHILL	KY 5
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRBOKYMA	CRAB ORCHARD	KY 6

Exhibit 1

KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAVLKYMA	STANFORD	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JNCYKYMA	JUNCTION CITY	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KKVLKYMA	KIRKSVILLE	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRVLKYMA	PERRYVILLE	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RCMDKYMA	RICHMOND	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STFRKYMA	STANFORD	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WACOKYMA	WACO	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BEREKYXA	BEREA	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BRSDKYXA	BURNSIDE	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BTVLKYXA	BRYANTSVILLE	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	HTVLKYXE	HUSTONVILLE	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LBRTKYXA	LIBERTY	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LNCSKYXA	LANCASTER	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	NANCKYXA	NANCY	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	PNLCKYXE	PAINT LICK	KY 6
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	SMRTKYXA	SOMERSET	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	BRHDKYXA	BRODHEAD	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	EBNKKYXA	EUBANK	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	EBRNKYAC	EAST BERNSTADT	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	FBSHKYXA	FAUBUSH	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	LONDKYXA	LONDON	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	LVTNKYXA	LIVINGSTON	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	MTVRKYAI	MOUNT VERNON	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	SCHLKYXA	SCIENCE HILL	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	SOVLKYXA	SHOPVILLE	KY 6
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	WHLLKYXA	WHITE LILY	KY 6
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRLSKYMA	CARLISLE	KY 8
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTKYMA	MT STERLING	KY 8
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MYVLKYMA	MAYSVILLE	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	EWNGKYXA	EWING	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	FMBGKYXA	FLEMINGSBURG	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	GRSNKYXA	GARRISON	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	HLBOKYXA	HILLSBORO	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	MRHDKYXA	MOREHEAD	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	OWVLKYXA	OWINGSVILLE	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	SHBGKYXA	SHARPSBURG	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	SLLCKYXA	SALT LICK	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	TLBOKYXA	TOLLESBORO	KY 8
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	VNBGKYXA	VANCEBURG	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	AGSTKYXA	AUGUSTA	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	BKVLKYXA	BROOKSVILLE	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	DOVRKYXA	DOVER	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	FRNLKYXA	FERNLEAF	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	GMTWKYXA	GERMANTOWN	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	JHVLKYXA	JOHNSVILLE	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	LWGMKYXA	LEWISBURG	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	MTOLKYXA	MOUNT OLIVET	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	MYLCKYXA	MAYS LICK	KY 8
KY	269691	KENTUCKY ALLTEL, INC. - LONDON	WASHKYXA	WASHINGTON	KY 8

Exhibit 2

State	SAC	Carrier Study Area Name	WC Code	WC Name
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KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLVSKYMA	SALVISA
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPFDKYMA	MOORESVILLE
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TYVLKYMA	TAYLORSVILLE
KY	265182	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WSBGKYMA	WILLISBURG
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KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CECLKYXA	CECILIA
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CMVLKYXA	CAMPBELLSVILLE
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	EZTWKYXA	COLUMBIA
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	GNBGKYXB	GREENSBURG
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	HGVLKYXA	HODGENVILLE
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LBNNKYXA	LEBANON
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	LRTTKYXA	LORETTO
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	SHDNKYXA	SOUTH HARDIN
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KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	JMTWKYXA	JAMESTOWN
KY	260401	DUO COUNTY TELEPHONE COOPERATIVE, INC.	RSSPKYXA	RUSSELLSPG
KY	290565	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	PNKNKYXA	PINE KNOT
KY	290565	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	STRNKYXA	STNSWHLYCY
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	ALBYKYXA	ALBANY
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	BSVLKYXA	BURKESVILLE2
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	CLMAKYXA	COLUMBIA
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	GLSGKYXA	GLASGOW1
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	MNTIKYXA	MONTICELLO
KY	269690	KENTUCKY ALLTEL, INC. - LEXINGTON	TMVLKYXA	TOMPKINSVILLE
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KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CNMRKYXA	CANMER
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CNTRKYXA	CENTER
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CVCYKYXA	CAVE CITY
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	EDTNKYXA	EDMONTON
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	FNRNKYXA	FOUNTANRUN
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GLSGKYXR	GLASGOW2
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GMLLYXA	GAMALIEL
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HRCVKYXA	HORSE CAVE
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HSVLKYXA	HISEVILLE
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	LUCSKYXA	LUCAS
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MFVLKYXA	MUNFORDVL
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MGNLKYXA	MAGNOLIA
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	SMSHKYXA	SUMMERSHAD
KY	260418	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	TMHLKYXA	TEMPLEHILL