

August 31, 2015

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HAND DELIVERED

Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED

AUG 31 2015

PUBLIC SERVICE
COMMISSION

RE: *Certification Pursuant to 54.314*

Dear Mr. Derouen:

In accordance with the Commission's September 27, 2002, Order in Administrative Case No. 381, AT&T Mobility¹ (SAC 269905) respectfully submits for filing its Eligible Telecommunications Carrier Certification and Report.

Attachments A-1 and A-2 to the Certification contain confidential material. Accordingly, AT&T Mobility also submits for filing its Petition seeking confidential treatment of that material (which is supported by the Affidavit of Kristi Turner). One confidential and proprietary copy and 10 redacted copies of Attachment A-1 and A-2 are being filed with the Commission.

Please address any questions or concerns regarding this filing to:

Tony Taylor
Executive Director – External Affairs
601 W. Chestnut St., Room 4 East
Louisville, Kentucky 40203
tt7148@att.com

We respectfully request that the Commission certify to the FCC pursuant to the state certification process set out in 47 C.F.R § 54.314 that such funds are used appropriately.

¹ New Cingular Wireless PCS, LLC d/b/a AT&T Mobility

Jeff R. Derouen
August 31, 2015
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Very truly yours,

Mark R. Overstreet

MRO

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 31 2015

PUBLIC SERVICE
COMMISSION

In the Matter of:

A CERTIFICATION OF THE CARRIERS)
RECEIVING FEDERAL UNIVERSAL SERVICE) Administrative Case No. 381
HIGH-COST SUPPORT)

**AFFIDAVIT OF KRISTI TURNER IN SUPPORT OF
PETITION OF AT&T MOBILITY (SAC 269905)
FOR CONFIDENTIAL TREATMENT**

Kristi Turner being first duly sworn on oath, states as follows:

1. I currently serve as a Vice President / General Manager for AT&T Mobility Corporation, the manager for New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility" or "Company"). In this capacity, I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of AT&T Mobility.

2. AT&T Mobility is requesting confidential treatment of spreadsheets describing the location of the Company's cell sites, proposed service improvement projects and the estimated locations and costs associated with such improvements (**Confidential Attachments A-1 and A-2**).

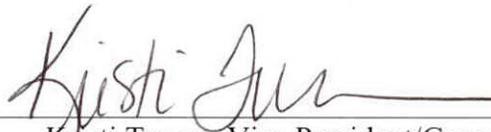
3. All information in **Confidential Attachments A-1 and A-2** is confidential, proprietary, and/or trade secret information that would aid competitors of AT&T Mobility.

4. All information in **Confidential Attachments A-1 and A-2** addresses the Company's network infrastructure, build out plans and operating costs. This information,

if disclosed, could cause substantial competitive harm to AT&T Mobility. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of AT&T Mobility.

5. Wireless providers, like AT&T Mobility, operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

6. This information is protected internally by the Company as confidential, proprietary, and/or trade secret information.



Kristi Turner, Vice President/General Manager

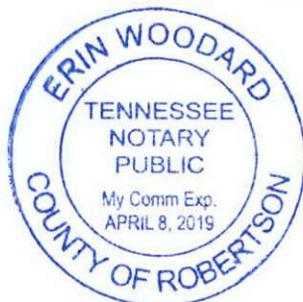
STATE OF Tennessee)
)
COUNTY OF Williamson

Subscribed and sworn to before me by Kristi Turner as Vice President / General Manager of AT&T Mobility Corporation, the manager for New Cingular Wireless PCS, LLC this 26th day of August 2015.



Notary Public

My commission expires: April 8, 2019



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 31 2015

PUBLIC SERVICE
COMMISSION

In the Matter of:

A CERTIFICATION OF THE CARRIERS)
RECEIVING FEDERAL UNIVERSAL SERVICE) Administrative Case No. 381
HIGH-COST SUPPORT)

**ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND
REPORT OF NEW CINGULAR WIRELESS PCS LLC D/B/A AT&T MOBILITY
(SAC 269905)**

4. Based on USAC's most recent projections, the Company currently estimates that it will receive approximately \$2.3 million in federal high-cost universal service support in 2016. The FCC released its *USF/ICC Transformation Order*¹ that made significant changes to its high-cost program, and among other changes adopted a final rule to phase out high-cost support payments to competitive ETCs, like AT&T Mobility.

5. Pursuant to the FCC's Orders, the Company hereby certifies that it used in the preceding year (2014) and will use in the upcoming year (2016) all of its federal high-cost universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended in accordance with 47 U.S.C. §254(e).

A. Service Improvement Progress Report

6. Since its designation as an ETC, the Company has continued to identify facility projects intended to expand network coverage within its designated service area. Attached as **Confidential Attachment A-1** is a summary of the types of facilities, locations, estimated budget and deployment dates for each of these service improvements for calendar year 2016.

7. **Confidential Attachment A-2** explains how the Company spent the USF support that it received in 2014.

8. Pursuant to 47 U.S.C. § 254(e), the Company will continue to utilize the federal high-cost universal service support it receives to maintain, upgrade and operate these network facilities consistent with the universal service objective of providing quality telecommunications services.

B. Requests for Service

¹ *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) ("*USF/ICC Transformation Order*").

9. AT&T Mobility committed to annually report the number of requests for service from potential customers within its designated ETC service area that were unfulfilled. The Company has adopted the calendar year as the time period for purposes of this report. Accordingly, for the time period January 1, 2014 through December 31, 2014, the Company experienced 1 (one) requests for service that the Company was unable to satisfy.

C. Complaints Per 1,000 Customers

10. The Company is also required to annually report the number of complaints per 1,000 customers. The Company has adopted the calendar year as the time period for purposes of this report. For the time period January 1, 2014 through December 31, 2014, the Company received 0.2279 complaints per 1,000 customers statewide from the Attorney General, Better Business Bureau, and the FCC.

The matters addressed above are within my personal knowledge and are true and correct.

AT&T Mobility



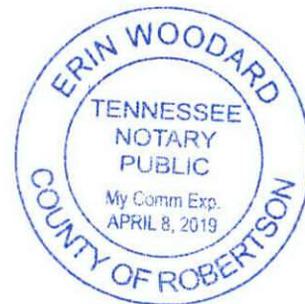
Kristi Turner

Vice President/General Manager

Subscribed and sworn to before me
this 24th day of August, 2015.


Notary Public

My Commission expires: April 8, 2019



**The entire document is confidential and
proprietary. There is no edited version.**

Confidential Attachment A-2
Kentucky Service Improvement Plan (2014 Actuals)

The entire document is confidential and proprietary. There is no edited version.
