

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 07 2010

PUBLIC SERVICE
COMMISSION

In the Matter of)
A Certification of the Carriers Receiving) Administrative Case No. 381
Universal Service High Cost Support)

T-MOBILE'S ANNUAL HIGH COST UNIVERSAL SERVICE CERTIFICATION

T-Mobile Central LLC and PowerTel/Memphis, Inc. (collectively, "T-Mobile" or the "Company") hereby submits its Annual High Cost Universal Service Certification, pursuant to the *T-Mobile ETC Order*¹ and *High Cost Certification Order*.² In the *T-Mobile ETC Order*, the Commission designated T-Mobile as an eligible telecommunications carrier ("ETC") in certain non-rural and rural telephone company areas for purposes of receiving federal universal service support and subsequently, the Universal Service Administrative Company ("USAC") assigned Study Area Code number 269024 to T-Mobile to represent its designated study area in Kentucky. Attached as Exhibit A is a list of the non-rural and rural telephone company areas included in T-Mobile's ETC service area in Kentucky.³

¹ In the Matter of Petition of T-Mobile Central LLC and PowerTel/Memphis, Inc. for Designation as Eligible Telecommunications Carriers Pursuant to Section 214(e)(2) of the Communications Act of 1934, *Order*, Case No. 2010-00050 (entered July 14, 2010) (*T-Mobile ETC Order*).

² In the Matter of A Certification of the Carriers Receiving Universal Service High Cost Support, *Order*, Administrative Case No. 381 (entered September 24, 2008) (*High Cost Certification Order*).

³ On August 6, 2010, T-Mobile filed a Motion For Clarification And to Amend Order *Nunc Pro Tunc*, which is currently pending, to clarify that T-Mobile never intended to redefine certain rural telephone study areas and that it should be designated as an ETC for the non-rural telephone company wire centers and rural telephone company study areas listed in Exhibit A to T-Mobile's application.

As a newly-designated ETC, T-Mobile provides the following information in this Annual High Cost Universal Service Certification:

- projection of high-cost universal service support to be received in 2011 pursuant to the *High Cost Certification Order*;
- description of capital and operating expenditures planned for T-Mobile's ETC service area in 2011 pursuant to the *High Cost Certification Order*;
- certification that all universal service support will be used for the provision, maintenance and upgrading of facilities and services for which support is intended pursuant to the *High Cost Certification Order*; and
- additional records and documentation of its progress toward meeting its build-out plans, number of complaints per 1,000 handsets, and unfulfilled requests for service pursuant to the *T-Mobile ETC Order*, along with additional information concerning T-Mobile's operations.

1. High Cost Universal Service Support

T-Mobile was designated as an ETC by the Commission on July 14, 2010. As a newly-designated ETC, T-Mobile is eligible for federal universal service support, which will be based upon line count filings it submits to USAC. To date, T-Mobile has not submitted its line count filings to USAC, but estimates that it will receive between \$1M and \$1.5M in 2011 in high cost support from the federal universal service fund. The actual amount of federal universal service support received by T-Mobile will depend upon the line count filings it submits to USAC, the per line support levels of each of the incumbent local exchange carriers ("ILECs") in T-Mobile ETC service area, and the operation of the cap on support received by competitive ETCs in Kentucky. In future Annual High Cost Universal Service Certifications, T-Mobile anticipates providing the Commission with more precise projections on universal service support to be received by the Company.

2. Capital and Operating Expenditures in ETC Service Area

Attached as Confidential Exhibit B is an estimate for T-Mobile's capital and operating expenditures for 2011 in its Kentucky ETC service area. As demonstrated in this Exhibit, T-Mobile's annual expenditures will greatly exceed T-Mobile's projected annual universal service support receipts. T-Mobile will undertake several network improvements to use universal service support to improve signal quality, coverage, and capacity within its designated ETC service area. In particular, T-Mobile has initiated several projects aimed at increasing its coverage in rural areas of Kentucky and improving customer experience through signal quality, capacity, and other network enhancements.

3. Certification On Use of High Cost Universal Service Support

T-Mobile hereby certifies that all federal high cost support received will be used only for the provision, maintenance, and upgrading of facilities and service for which support is intended, pursuant to 47 C.F.R. §§ 54.313 and 54.314. Attached as Exhibit C are T-Mobile's high cost certifications relative to its designations in both rural and non-rural ILEC service areas.

4. Additional Records and Documentation

In accordance with the *T-Mobile ETC Order*, T-Mobile committed to providing the Commission with additional records and documentation of its progress toward meeting its build-out plans, number of complaints per 1,000 handsets, and unfulfilled requests for service. T-Mobile tracks customer complaints and requests for service, but, was not designated as an ETC in the reportable period. As a newly-designated ETC in Kentucky, the Company will begin reporting complaints and unfulfilled service requests

as of July 14, 2010, the effective date of its designation, which will be included in its next annual certification filing, along with a progress report on T-Mobile meeting its build-out plans, as explained in Confidential Exhibit B.

T-Mobile also follows appropriate procedures for network outage reporting consistent with the FCC rules. T-Mobile evaluates each network outage on a case-by-case basis to determine the cause of the outage, the impact on customers, T-Mobile's ability to meet its service provisioning obligations, including the availability of 911 services, and the steps that can be taken to prevent future outages.

To ensure functionality in emergency situations, T-Mobile "has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."⁴ In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

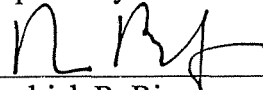
- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile's network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels ("COWs"), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-solutions, such as additional capacity and antenna towers can be deployed.
- The majority of sites not equipped with fixed generators have battery back up systems installed to maintain service in the event of a widespread power outage.

⁴ 47 C.F.R. § 54.202(a)(2).

CONCLUSION

T-Mobile hereby submits its Annual High Cost Universal Service Certification for its Kentucky ETC designation pursuant to the *T-Mobile ETC Order and High Cost Certification Order*, and respectfully requests the Commission to certify to USAC and the Federal Communications Commission (“FCC”) that T-Mobile continues to be eligible for federal universal service support.

Respectfully submitted,



Kendrick R. Riggs
Douglas F. Brent
STOLL KEENON OGDEN, PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
(502) 333-6000
(502) 333-6099 Fax
douglas.brent@skofirm.com

Counsel to T-Mobile

September 1, 2010

DECLARATION OF T-MOBILE

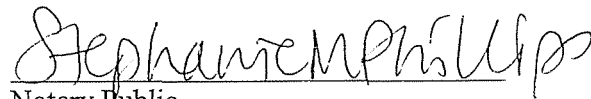
On behalf of T-Mobile Central LLC and PowerTel/Memphis, Inc. ("T-Mobile"),
the undersigned, H. Skip Cornett, hereby certifies the following:

1. I serve as Vice President of Tax of T-Mobile USA, Inc., the parent company of T-Mobile Central LLC and PowerTel/Memphis, Inc.;
2. I am authorized to execute this certification on behalf of T-Mobile; and
3. I certify that the following is true and correct to the best of my knowledge and belief with respect to T-Mobile's Kentucky eligible telecommunications carrier ("ETC") area:
 - a. T-Mobile's projected universal service support for Kentucky will be between \$1M and \$1.5M in 2011;
 - b. T-Mobile's estimated capital and operating expenditures in 2011 as identified in Confidential Exhibit B; and
 - c. T-Mobile will use universal support only for its intended purposes as stated in Exhibit C.



H. Skip Cornett
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
425-383-4000 (tel)

Subscribed and sworn to before me
this 31st day of August 2010.



Notary Public

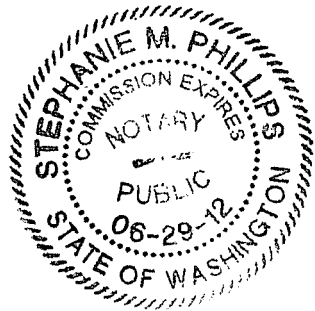


EXHIBIT A

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

KENTUCKY ETC SERVICE AREA

RURAL TELEPHONE COMPANIES SERVED IN THEIR ENTIRETY

Company Name	Study Area Code	Wire Center (CLLI Code)
BALLARD RURAL TELEPHONE COOP. CORP., INC	260396	BNDNKYXA
		BRLWKYXA
		GAGEKYXA
		HETHKYXA
		KEVLKYXA
		LACTKYXA
		WCKLKYXA
BRANDENBURG TELEPHONE CO.	260398	BRBGKYXA
		BTTWKYXA
		CSTRKYXA
		IVTNKYXA
		NGRTKYXA
		PYVLKYXA
		RDCLKYXA
VNGVKYXA		
DUO COUNTY TELEPHONE COOPERATIVE, INC	260401	BSVLKYXR
		FRPLKYXA
		JMTWKYXA
		RSSPKYXA
LOGAN TELEPHONE COOPERATIVE, INC	260413	AIVLKYXE
		AUBNKYXA
		DNMRKYXA
		LGPTKYXA
		LWBGKYL
		ROCHKYXA
NORTH CENTRAL TELEPHONE COOPERATIVE, INC. - KY	290573	SCVLKYXR
SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC	260418	BFLOKYXA
		CNMRKYXA
		CNTRKYXA
		CVCYKYXA
		EDTNKYXA
		FNRNKYXA
		GLSGKYXR
		GMLLKYXA
		HRCVKYXA
		HSVLYXA
		LUCSKYXA
		MFVLKYXA
		MGNLKYXA
		SMCHKYXA
TMHLKYXA		
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC	260421	CNHMKYXA
		FLDLKY01
		FNFMKYXA

Company Name	Study Area Code	Wire Center (CLLI Code)
		FRNGKYXA
		FRTNKYXA
		HAZLKYXA
		HRDNKYXA
		KRKSKYXA
		LOWSKYXA
		LYGVKYXA
		LYVLKYXA
		NWCNKYXA
		SDLIKYXA
		WINGKYXA
		WPLNKYXA
	WINDSTREAM KENTUCKY WEST, INC.	260402
		SHPVKYXA
		ZNTNKYXA

NON-RURAL TELEPHONE COMPANY WIRE CENTERS SERVED IN THEIR ENTIRETY

Company Name	Study Area Code	Wire Center (CLLI Code)
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	ALBYKYXA
		ASLDKYXA
		BEREKYXA
		BRSDKYXA
		BRVLKYXA
		BSVLKYXA
		BTVLKYXA
		CECLKYXA
		CLMAKYXA
		CMVLKYXA
		CTBGKYXA
		EWNGKYXA
		EZTWKYXA
		FMBGKYXA
		FMBGKYXA
		GLSGKYXA
		GNBGKYXB
		GNUPKYXA
		GRSNKYXA
		GYSNKYXA
		HGVLKYXA
		HLBOKYXA
		HTVLKYXE
		HZRDKYXA
		LBNNKYXA
		LBRTKYXA
		LNCSKYXA
		LRTTKYXA
		LTFDKYXA
		LXTNKYUK
		LXTNKYXA
		LXTNKYXB
		LXTNKYXC
		LXTNKYXD
LXTNKYXE		
LXTNKYXF		
LXTNKYXG		
MDWYKYXA		
MEDSKYXA		
MNTIKYXA		
MRHDKYXA		
NANCKYXA		
NCVLKYXA		
OLHLKYXA		

Company Name	Study Area Code	Wire Center (CLLI Code)
		OWVLKYXA
		PNLCKYXE
		RSSLKYXB
		SCVLKYXA
		SHBGKYXA
		SHDNKYXA
		SLLCKYXA
		SMRTKYXA
		SSHRKYXA
		TLBOKYXA
		TMVLKYXA
		VICCKYXA
		VNBGKYXA
		VRSLKYXA
		WLMRKYXA
CINCINNATI BELL, INC.	265061	ALXNKYAL
		BTLRKYBR
		BURLKYBN
		CRTDKYCT
		CVTNKYCN
		FLRNKYFL
		FTTHKYFT
		GLCOKYGC
		INDPKYIN
		LKPCKYLP
		WLTNKYWL
		WLTWKYWT
		WRSWKYWR
BELLSOUTH-KY	265182	BDFRKYMA
		BGDDKYMA
		BLFDKYMA
		BNTNKYMA
		BRGNKYMA
		BRMNKYMA
		BRTWKYES
		BVDMKYMA
		BWLGTKYMA
		CADZKYMA
		CHPLKYMA
		CLHNKYMA
		CMBGKYMA
		CNCYKYMA
		CNTWKYMA
		COTNKYMA
		CRBNKYMA
		CRBOKYMA

Company Name	Study Area Code	Wire Center (CLLI Code)
		CRTNKYMA
		CYDNKYMA
		CYNTKYMA
		DAVLKYMA
		DWSPKYES
		EDVLKYMA
		EKTNKYMA
		EMNKNYES
		EMNKNYPL
		ENSRKYMA
		ERTNKYMA
		FKLNKYMA
		FLTNKYMA
		FNVLYMA
		FORDKYMA
		FRFTKYES
		FRFTKYMA
		GBVLKYMA
		GHNTKYMA
		GNVLYMA
		GRACKYMA
		GRTWKYMA
		HABTKYMA
		HANSKYMA
		HBVLKYMA
		HDBGKYMA
		HNSNKYMA
		HPVLKYMA
		HRFRKYMA
		HRLNKYMA
		KKVLKYMA
		LBJTKYMA
		LGRNKYES
		LRBGKYMA
		LSVLKY26
		LSVLKYAN
		LSVLKYAP
		LSVLKYBE
		LSVLKYBR
		LSVLKYCW
		LSVLKYFC
		LSVLKYHA
		LSVLKYJT
		LSVLKYO
		LSVLKYSH
		LSVLKYSL

Company Name	Study Area Code	Wire Center (CLLI Code)
		LSVLKYSM
		LSVLKYTS
		LSVLKYVS
		LSVLKYWE
		LVMRKYMA
		MACEKYMA
		MDVIKYMA
		MGTWKYMA
		MLTNKYMA
		MRGPKYMA
		MRRYKYMA
		MTEDKYMA
		MTSTKYMA
		MYFDKYMA
		NEBOKYMA
		NRVLKYMA
		OKGVKYES
		OWBOKYMA
		PARSKYMA
		PDCHKYIP
		PDCHKYLO
		PDCHKYMA
		PDCHKYRL
		PIVLKYMA
		PLRGKYMA
		PNTHKYMA
		PNVLKYMA
		PRBGKYES
		PRTNKYES
		RBRDKYMA
		RCMDKYMA
		RLVLKYMA
		RSTRKYES
		SDVLKYMA
		SEBRKYMA
		SHVLKYMA
		SLGHKYMA
		SLPHKYMA
		SLVSKYMA
		SPFDKYMA
		SRGHKYMA
		SSVLKYMA
		STCHKYMA
		STGRKYMA
		STNLKYMA
		TYVLKYMA

Company Name	Study Area Code	Wire Center (CLLI Code)
		WACOKYMA
		WDDYKYMA
		WLBGKYMA
		WLVLYMA
		WNCHKYMA
		WSPNKYMA

CONFIDENTIAL EXHIBIT B

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

CAPITAL AND OPERATING EXPENDITURES FOR

KENTUCKY ETC SERVICE AREA

T-Mobile Central LLC and PowerTel/Memphis, Inc. ("T-Mobile)

Estimated 2011 Kentucky Capital and Operating Expenses

Overall Capital and Operating Expenditures Summary: T-Mobile's annual capital and operating expenditures in Kentucky will greatly exceed projected annual universal service support and will be used to improve signal quality, coverage, and capacity within its designated eligible telecommunications carrier ("ETC") service area. In particular, T-Mobile has initiated several projects aimed at improving customer experience through coverage, signal quality, capacity and other network enhancements.

Existing Network Serving ETC Service Area: T-Mobile has an extensive network of wireless telecommunications facilities in Kentucky, including [REDACTED].

Projected Universal Service Support: T-Mobile has not filed its line count filings with Universal Service Administrative Corporation ("USAC"), but estimates that it will receive between \$1M and \$1.5M in 2011 in high cost support from the federal universal service fund. The actual amount of federal universal service support received by T-Mobile will depend upon its line counts filings with USAC, the per line support levels available in each of the incumbent local exchange carrier ("ILEC") areas in T-Mobile ETC service area, and the operation of the cap on support received by competitive ETCs in Kentucky.

New Cell Sites: T-Mobile is constructing [REDACTED] in Kentucky in 2010 at a cost of approximately \$[REDACTED] and anticipates constructing an additional [REDACTED] in Kentucky in 2011 at a cost of approximately \$[REDACTED].

Capital Expenditures: T-Mobile anticipates aggregate capital expenditures of approximately \$[REDACTED] in Kentucky in 2011, which includes: (i) the construction

of new cell sites to expand coverage; (ii) switching upgrades; and (iii) other network enhancements to improve signal quality and capacity.

Operating Expenditures: T-Mobile's expenditures to operate and maintain its network in Kentucky in 2011 will be approximately \$ [REDACTED].

EXHIBIT C

T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

HIGH-COST CERTIFICATIONS

Rural High-Cost Support

August 30, 2010

2011

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

HIGH-COST SUPPORT

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

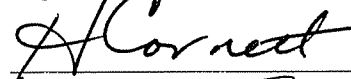
Re: CC Docket No. 96-45
Rural Use High-Cost Support
Annual Certification Filing Pursuant to 47 C.F.R. § 54.314

This is to certify that T-Mobile Central LLC and PowerTel/Memphis, Inc. (“T-Mobile”) will use its **RURAL HIGH-COST SUPPORT** only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act, 47 U.S.C. § 254(e).

I am authorized to make this certification on behalf of the company name above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
T-Mobile Central LLC and PowerTel/Memphis, Inc.	Kentucky	269024

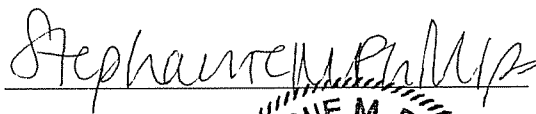
Signed:



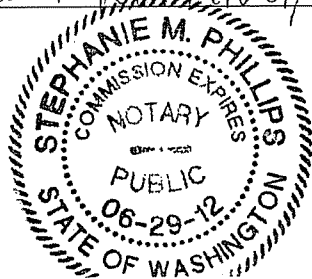
H. Skip Cornett
Vice President, Tax
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006
425-383-4000 (tel)

Carrier's Name: T-Mobile Central LLC
PowerTel/Memphis, Inc.

Subscribed and sworn to before me
this 30th day of August 2010.



Notary Public



Date Received
(For official use only)