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**DOUGLAS F. BRENT**  
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August 28, 2015

RECEIVED

AUG 31 2015

PUBLIC SERVICE  
COMMISSION

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

**RE: *Administrative Case No. 381--T-Mobile's Request for Confidential Treatment of Material Submitted Outside of a Case***

Dear Mr. DeRouen:

T-Mobile Central LLC and PowerTel/Memphis, Inc. (collectively, "T-Mobile" or the "Company") participate in the Federal Universal Service Program and are required to file an annual compliance affidavit and other materials in support of continuing certification as eligible telecommunications carriers. The requirements relate primarily to filing obligations imposed by the Federal Communications Commission. The Kentucky Commission has required participants in the federal high cost fund to file an annual affidavit confirming the use of such funds for their intended purposes. That requirement was initiated in Administrative Case No. 381, which is now closed. Accordingly, pursuant to 807 KAR 5:001, Section 13(3) and KRS 61.878(1), T-Mobile requests that the Public Service Commission ("Commission") grant confidential protection to the following information included in its attached filing, including the report to the Federal Communications Commission ("FCC") to comply with 47 C.F.R. § 54.313 and 54.422:

- Unfulfilled Service Requests (voice)
- Number of Complaints per 1,000 customers (voice and broadband)
- Service Outages
- Five Year Service Quality Improvement Plan (coverage map Exhibit/Progress Report)
- Functionality in Emergency Situations

This information is included in the FCC Form 481 required of all Eligible Telecommunications Carriers, and includes network build-out information similar to that filed with the Commission pursuant to the *T-Mobile ETC Order*<sup>1</sup> and *High Cost Certification Order*<sup>2</sup> as a means for the Commission to monitor the use of high cost funding by ETCs. ETCs certified by the Commission are required to file the FCC report with the state commission that approved the carrier's participation in the High Cost and/or Lifeline programs. T-Mobile is eligible for both programs. As required under the Commission's rules, one copy of the confidential information is being furnished with this letter.<sup>3</sup> One redacted copy is included for the Commission's public records.

### GROUNDS FOR REQUEST

The Kentucky Open Records Act exempts from disclosure certain commercial information, including records generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records. KRS 61.878(1)(c). CMRS is perhaps the most competitive segment of the modern telecommunications business. Potential customers often have five or more carriers to choose from. This reality is acknowledged by Kentucky law, which states the provision of CMRS in Kentucky is market-based and not subject to regulation. KRS 278.54611(1). As the market is, without question, highly competitive, T-Mobile's disclosures related to service quality and planned improvements are highly confidential trade secret information subject to protection under the Kentucky Open Records Act.

The Commission has taken the position that the statute and the regulation require the party requesting confidentiality to demonstrate actual competition and the likelihood of competitive injury if the information is disclosed. That requirement is easily met here. T-Mobile competes not only against other Commercial Mobile Radio Service ("CMRS") providers like AT&T Wireless, Bluegrass Cellular, Verizon Wireless, Cricket Communications and Sprint Nextel, but also with voice and unregulated broadband offerings of cable providers and wireline providers like AT&T Kentucky and Windstream. Consumers choose providers based on a variety of factors, including their subjective impression about the service quality and network reliability of particular carriers. Thus, public disclosure of proprietary information could easily cause competitive injury to T-Mobile, particularly if the information were to be used selectively by a competitor. Moreover, the Commission has long recognized the highly competitive nature of CMRS as a reason to provide confidential treatment to information submitted to the Commission by CMRS providers. *See, e.g., In the Matter of: ACC of Kentucky LLC's Petition for Confidential Protection*, Case No. 99-184, (January 24, 2000) (confidential treatment for intrastate gross revenue reports). Obviously, the confidential and proprietary business

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<sup>1</sup> *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*).

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

<sup>3</sup> A complete copy of the report is filed on yellow paper; however, confidential treatment is requested only for the five reporting areas noted above.

information for which confidential protection is sought in this case is precisely the sort of information meant to be protected by KRS 61.878(1)(c)1. **The PSC has previously granted confidential treatment to T-Mobile for the same forms of information being filed herewith.** See *Letter from Jeff Derouen to Douglas F. Brent* dated July 10, 2014 (granted confidential protection to T-Mobile Form 481 filed October 15, 2013).

In *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766 (Ky. 1995), the Kentucky Supreme Court held that financial information submitted by General Electric Company with its application for investment tax credits was not subject to disclosure simply because it had been filed with a state agency. The Court applied the plain meaning rule to the statute, reasoning that “[i]t does not take a degree in finance to recognize that such information concerning the inner workings of a corporation is ‘generally recognized as confidential proprietary.’” *Id.* at 768.

The same analysis applies here. T-Mobile is disclosing information concerning fulfillment rates, complaints, and information about T-Mobile’s network expansion during 2012 and 2013. Form 481 also discloses T-Mobile’s anticipated expenditures to operate and maintain its Kentucky network in 2013. The Five-Year Service Quality Improvement Plan includes information related to capital expenditures during 2012 and an estimate for T-Mobile’s capital and operating expenditures for 2013 in its Kentucky ETC service area. As demonstrated in the portion of the FCC Form 481, T-Mobile has made and will undertake several more network improvements to use universal service support to improve signal quality, coverage, and capacity within its designated ETC service area. The maps included with the FCC report illustrate areas within the Kentucky ETC Service Area where T-Mobile may not yet be able to fulfill service requests due to coverage issues. Finally, T-Mobile is disclosing information related to its ability to remain functional during emergency situations. The Commission granted confidential treatment to T-Mobile and other CMRS providers when similar information was provided in response to data requests after Hurricane Ike and the ice storm in Western Kentucky.

All of this information is capable of misinterpretation and deliberate misuse. A competitor of T-Mobile, whether an incumbent local carrier, a CLEC, or another wireless carrier, could use this information to disparage T-Mobile or attempt to paint T-Mobile’s operations in a false light. This could include carriers that may or may not be disclosing information comparable to what T-Mobile is providing to the Commission.

Jeffrey DeRouen  
August 28, 2015  
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T-Mobile is entitled to confidential protection for the information at issue and requests that the Commission confirm that the referenced information in this compliance filing will not be disclosed. If the Commission disagrees, however, it must hold an evidentiary hearing (a) to protect the due process rights of T-Mobile and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter. *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591, 592-94 (Ky. Ct. App. 1982).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. Brent", is written over the typed name.

Douglas F. Brent

*Counsel to T-Mobile*



certain ministerial errors that it had identified; specifically, some of the Common Language Location Identifier codes were listed incorrectly in the order. Concurrent with its *Amendment Motion*, T-Mobile filed an Amended Exhibit A correcting the issues set forth in the *Amendment Motion*, and, on August 24, 2010, the Commission granted the *Amendment Motion* and replaced the original service area Appendix with the Amended Exhibit A that T-Mobile had filed.<sup>3</sup> The *T-Mobile Amendment Order* includes the list of the rural local exchange carrier study areas and the non-rural local exchange carrier wire centers that comprise T-Mobile's designated service area in Kentucky.

In its *USF/ICC Transformation Order*, the Federal Communications Commission ("FCC") adopted changes to its universal service rules,<sup>4</sup> and, in its *Lifeline Reform Order*, the FCC adopted further changes to its universal service rules governing the provision of Lifeline service.<sup>5</sup> Among the changes adopted in these two orders, the FCC revised the annual reporting and certification requirements, which are reflected in 47 C.F.R. §§ 54.313, 54.314, and 54.422 and are now incorporated into the FCC Form 481 Annual Report filed with the FCC, Universal Service Administrative Company ("USAC"), and the Commission.<sup>6</sup> In this Annual Report, T-Mobile addresses each of the reporting requirements adopted by the Commission in the *T-Mobile ETC Order* and the *High Cost Certification Order* with reference to the updated annual reporting and certification requirements adopted by the FCC.

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<sup>3</sup> *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 August 24, 2010) (*T-Mobile Amendment Order*).

<sup>4</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*").

<sup>5</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

<sup>6</sup> T-Mobile files its Form 481 with the FCC by July 1, and is filing a copy with the Kentucky Commission consistent with the requirements of this case.

## **II. ANNUAL CERTIFICATION AND REPORTS**

### **a. Federal High Cost Universal Service Support**

The *High Cost Certification Order* requires ETCs to submit a projection of federal high cost universal service support to be received in the following calendar year. As the Commission is aware, in the *USF/ICC Transformation Order*, the FCC implemented several reforms to the universal service system, including, but not limited to, eliminating the identical support rule, limiting the per line high cost support, freezing high cost support for all competitive ETCs ("CETCs") for an interim period of six months in 2012, and phasing down all high cost support for CETCs over a five year period beginning in July 2012. Beginning in July 2012, CETCs became subject to a 20 percent per year phase down, with all legacy high cost support to CETCs being eliminated by 2016.<sup>7</sup>

In 2014, T-Mobile received a total of \$1,044,108 in federal legacy high cost universal service support for its Kentucky study area. Based on the computations provided by the USAC, T-Mobile estimates that it will receive approximately \$1,044,108 million in federal high cost universal service support for its Kentucky service area in 2015 based upon the steps taken by the FCC in the *USF/ICC Transformation Order* to reduce legacy funding for CETCs. This estimate is based on current information and may change upon revisions or modifications to FCC requirements.

### **b. Capital and Operating Expenditures in ETC Service Area**

The *High Cost Certification Order* requires ETCs to submit their planned use of universal service support for the following calendar year. Attached as Confidential Exhibit A is an estimate for T-Mobile's capital and operating expenditures for 2014 in its

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<sup>7</sup> 47 C.F.R. § 54.307(e)(5).

Kentucky ETC service area.<sup>8</sup> As demonstrated in Confidential Exhibit A, 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.

**c. Certification On Use of High Cost Universal Service Support**

The *High Cost Certification Order* requires ETCs to certify that all federal high cost universal service support received will be used only for the provision, maintenance and upgrading of facilities and service for which the support is intended. T-Mobile hereby certifies that all federal high cost universal service support received will be used only for the provision, maintenance, and upgrading of facilities and service for which support is intended, consistent with 47 C.F.R. § 54.314. T-Mobile's certification on use of federal high cost universal service support was previously filed with the Commission on July 7 and a copy is attached as Exhibit B.

**d. T-Mobile ETC Designation Reporting Requirements**

In the *T-Mobile ETC Order*, the Commission required T-Mobile to annually provide additional records and documentation of its (a) progress toward meeting its build-out plans; (b) number of complaints per 1,000 handsets; and (c) unfulfilled requests for service.

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<sup>8</sup> A motion for confidential treatment is being filed contemporaneously.



### **1. 2014 Progress Report**

Included in Confidential Exhibit A is T-Mobile's report demonstrating its progress toward meeting its previously filed build-out plan. As demonstrated in Confidential Exhibit A, T-Mobile's 2014 expenditures greatly exceeded T-Mobile's federal high cost universal service support receipts. T-Mobile undertook several projects using the federal high cost universal service support it received to improve signal quality, coverage, and capacity within its designated ETC service area. In particular, T-Mobile completed several projects that increased its coverage in rural areas of Kentucky thereby improving customer experience through signal quality, capacity, and other network enhancements.

### **2. Complaints per 1,000 handsets**

T-Mobile includes as Confidential Attachment C a copy of the FCC Form 481 filed with the FCC identifying complaints per 1,000 handsets report for 2014. In accordance with the *T-Mobile ETC Order*, T-Mobile will take the necessary steps to resolve any customer complaints in 2015 and beyond.

### **3. Unfulfilled Requests for Service**

T-Mobile did not have any unfulfilled requests for service for 2014. In accordance with the *T-Mobile ETC Order*, T-Mobile will take the necessary steps to resolve and track any requests for service (as necessary) in 2015 and beyond.

### **4. Additional FCC Reporting and Certification Requirements**

47 C.F.R §§ 54.313 and 54.422 require ETCs to submit an annual report using FCC Form 481 containing information and certifications related to its eligibility for high cost and Lifeline universal service support. T-Mobile filed its FCC

Form 481 for its ETC designation in Kentucky with the FCC and USAC on July 1, 2014. Attached as Confidential Attachment C is a copy of the FCC Form 481.

### III. CONCLUSION

T-Mobile hereby submits its Annual High Cost Universal Service Report and Certification for its Kentucky ETC designation pursuant to the *T-Mobile ETC Order*, the *High Cost Certification Order*, and 47 C.F.R. §§ 54.313, 54.314 and 54.422 and respectfully requests the Commission to certify to USAC and the FCC that T-Mobile continues to be eligible for federal universal service support.

Respectfully Submitted,



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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](mailto:douglas.brent@skofirm.com)

*Counsel to T-Mobile*

August 28, 2015

# EXHIBIT A

ADMINISTRATIVE CASE NO. 381

T-MOBILE'S REQUEST FOR  
CONFIDENTIAL TREATMENT  
OF MATERIAL SUBMITTED  
OUTSIDE OF A CASE

HAS BEEN REDACTED

IN ITS ENTIRETY

**T-MOBILE UNIVERSAL SERVICE HIGH COST CERTIFICATION**

State of Kentucky Study Area Codes:  
269024 (Legacy)  
268020, 268921 (Mobility Fund)

I am Chris Miller, Vice President of Tax for T-Mobile USA, Inc., which is the parent company of and controls T-Mobile Central LLC and PowerTel/Memphis, Inc. (hereinafter "T-Mobile") in this matter. I hereby submit this certification in support of T-Mobile's petition for certification as an Eligible Telecommunications Carrier ("Petition").

In my capacity as Vice President of Tax for T-Mobile, I have general knowledge of T-Mobile's operation as a commercial mobile radio services ("CMRS") provider in the State of Kentucky, and its qualifications and abilities to provide CMRS-based universal service consistent with this Petition. I certify that, to the best of my knowledge and belief, T-Mobile used all federal high-cost support in the preceding calendar year (2014) and will use all federal high-cost support in the coming calendar year (2016) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.314.

I am authorized to make this certification on behalf of T-Mobile.

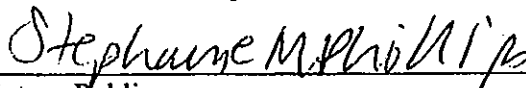
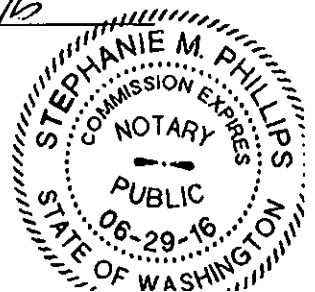
Signed,



Chris Miller, Vice President, Tax  
T-Mobile USA, Inc.  
12920 SE 38<sup>th</sup> Street, Bellevue, WA 98006

STATE OF WASHINGTON  
COUNTY OF KING

Acknowledged before me this 30<sup>th</sup> day of June, 2015, by Chris Miller, as Vice President, Tax of T-Mobile USA, Inc., who is personally known to me or produced identification and who did take an oath.

  
Notary Public

<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Rhonda R. Thomas
<035> Contact Telephone Number: Number of the person identified in data line <030>	4253834000 ext. 4215
<039> Contact Email Address: Email of the person identified in data line <030>	rhonda.thomas@t-mobile.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313	54.422
	Completion Required	Completion Required

		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice) <input type="text" value="0"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) <input type="text"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed <input type="text" value="0.0"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile <input type="text"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed <input type="text"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile <input type="text"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <input type="text" value="2014 CTIA Certification.pdf"/> (attach descriptive document)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <input type="text" value="Line 610.pdf"/> (attach descriptive document)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification <input type="text" value="Not Applicable"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <input type="text"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110> <input type="text"/>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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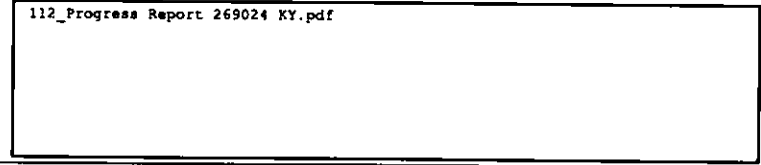
<b>&lt;010&gt; Study Area Code</b>	269024
<b>&lt;015&gt; Study Area Name</b>	T-Mobile Central LLC and PowerTel/Mem
<b>&lt;020&gt; Program Year</b>	2016
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Rhonda R. Thomas
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	4253834000 ext. 4215
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	rhonda.thomas63@t-mobile.com

**<110> Has your company received its ETC certification from the FCC?** (yes / no)

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

**<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.**



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets**
- <114> Report how much universal service (USF) support was received**
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality**
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage**
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity**
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.**

Yes
Yes
Yes
Yes
Yes
Yes











**(900) Tribal Lands Reporting Data Collection Form** FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035> Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext. 4215
<039> Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas63@t-mobile.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1100) No. Terrestrial Backhaul Reporting Data Collection Form** FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Hem
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035> Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext.4215
<039> Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas63@t-mobile.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	269024
<015>	Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035>	Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext. 4215
<039>	Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas63@t-mobile.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

1210\_lifeline rates t&c- KY.pdf

Name of Attached Document

<1220> Link to Public Website HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

**(2000) Price Cap Carrier Additional Documentation**  
**Data Collection Form**  
*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	269024
<015>	Study Area Name	
<020>	Program Year	1-MOBILE CENTRAL LLC AND POWER1617HAM
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	RONDA R. THOMAS
<039>	Contact Email Address - Email Address of person identified in data line <030>	4255654000 ext. 4213 rthomas.thomas@1617-mobility.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))**

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

**Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting (47 CFR § 54.313(e))**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation:	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035> Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext. 4215
<039> Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas@t-mobile.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202[s]) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))    
 Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))    
 Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No)  Yes  No

(3014) If yes, does your company file the RUS annual report (Yes/No)  Yes  No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation    
 Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)  Yes  No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information    
 Name of Attached Document Listing Required Information

<b>(3000) Rate Of Return Carrier Additional Documentation (Continued)</b>		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Wen
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035> Contact Telephone Number - Number of person identified in data line <030>	4253824000 ext. 4215
<039> Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas@t-mobile.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	269024
<015> Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035> Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext. 4215
<039> Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas63@t-mobile.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	T-Mobile Central LLC and PowerTel/Mem
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/30/2015</span>
Printed name of Authorized Officer:	Chris Miller
Title or position of Authorized Officer:	VP, Tax
Telephone number of Authorized Officer:	4253835931 ext.
Study Area Code of Reporting Carrier:	269024 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	269024
<015>	Study Area Name	T-Mobile Central LLC and PowerTel/Mem
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Rhonda R. Thomas
<035>	Contact Telephone Number - Number of person identified in data line <030>	4253834000 ext. 4215
<039>	Contact Email Address - Email Address of person identified in data line <030>	rhonda.thomas63@t-mobile.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments





