

MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

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August 20, 2010

**BY ELECTRONIC FILING**

Ms. Ann Cole, Director  
Commission Clerk  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 100150-TL

Dear Ms. Cole:

Enclosed for filing on behalf of T-Mobile South, LLC is an electronic copy of T-Mobile South, LLC's Annual Certification as a Eligible Telecommunications Carrier in Rural Service Areas and Request to Amend Certification Area in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self

FRS/amb  
Enclosure  
cc: Michelle Thomas, Esq.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: 2011 State Annual certification )  
of rural telecommunications carriers ) Docket No. 100150-TL  
pursuant to 47 C.F.R. 54.314, High )  
Cost Universal Service. ) Filed: August 20, 2010  
\_\_\_\_\_ )

**T-MOBILE SOUTH, LLC'S ANNUAL CERTIFICATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN CERTAIN RURAL SERVICE AREAS AND  
REQUEST TO AMEND CERTIFICATION AREA**

T-Mobile South LLC ("T-Mobile" or "Company"), a commercial mobile radio service ("CMRS") provider designated to receive federal universal service high cost support in certain rural incumbent local exchange telecommunications company ("ILEC") wire centers, hereby submits to the Florida Public Service Commission ("Commission" or "PSC") its annual Eligible Telecommunications Carrier ("ETC") certification required by 47 C.F.R. sections 54.209, 54.313, 54.314, 54.809, and 54.904; and, concurrently, its request to amend its authorized list of rural wire centers for which it is authorized to receive federal universal service support, including high cost support, from the federal Universal Service Fund ("FUSF") so as to correct a wire center that was inadvertently omitted from T-Mobile's list of authorized rural wire centers. In support of this Petition, T-Mobile states as follows:

1. On November 12, 2009, T-Mobile filed a petition requesting designation as an ETC in certain rural wire centers of Embarq (now CenturyLink), Frontier, Indiantown, NEFCOM, TDS, Smart City, and Windstream in order to be eligible to receive high cost and low-income federal universal service support.

2. By Proposed Agency Action Order dated July 29, 2010, Order No. PSC-10-0478-PAA-TP (“PAA Order”), this Commission proposed to grant the requested ETC designation for the specifically identified rural wire centers in the PAA Order. On August 20, 2010, the Commission issued its consummating order making the terms of the PAA Order final and effective. Order No. PSC-10-0535-CO-TP (August 20, 2010).

3. As a CMRS provider designated by this Commission to receive federal universal service high cost support in certain rural ILEC wire centers, T-Mobile is required to file an annual certification with this Commission. Order No. PSC-05-0824-FOF-TL (August 15, 2005) and Order No. PSC-050824A-FOF-TL (August 17, 2005). Since T-Mobile’s ETC status to serve the rural wire centers identified in the PAA Order is only today final and effective, T-Mobile is now filing with this Petition its attached annual certification affidavit so that the Commission may include T-Mobile in its annual certification to the Federal Communications Commission (“FCC”) by October 1, 2010, for support in 2011. In its certification, T-Mobile affirms that it will only use the federal high-cost support it receives for the provision, maintenance, and upgrading of facilities and services for which the support is intended consistent with applicable law. Accordingly, T-Mobile respectfully requests that T-Mobile’s certification be found in compliance and reported to the FCC pursuant to the FCC’s requirements by October 1, 2010.


4. In addition to the rural wire centers approved by this Commission in the PAA Order, upon further review T-Mobile has discovered that in making its original application to this Commission that for the CenturyLink rural wire centers it inadvertently included one wire center twice and omitted another wire center.

Specifically, at the bottom of page 2 of Attachment A to T-Mobile's application, and the corresponding exhibit to the PAA Order, under the Embarq (now CenturyLink) wire centers, the wire center CLLI **LKHLFLXA** appears. The same wire center CLLI also appears at the top of page 3 of Attachment A and the next wire center CLLI alphabetically that should have been enumerated, **LKPCFLXA**, is missing. T-Mobile respectfully requests that the Commission amend T-Mobile's ETC designation to include the **LKPCFLXA** wire center. T-Mobile further request that the **LKPCFLXA** wire center be included as a part of the annual certification to receive federal universal high cost support in certain rural ILEC wire centers subject to the Commission's approval of this amended wire center authority.

WHEREFORE, T-Mobile hereby respectfully requests that its attached certification be found in compliance with the applicable reporting requirements and reported to the FCC pursuant to the FCC's requirements by October 1, 2010, and that its authorized rural area be amended to include the **LKPCFLXA** wire center and that such wire center be included in the certification to the FCC.

Respectfully Submitted,

By: \_\_\_\_\_

  
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Attorneys For  
T-Mobile South LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U.S. Mail this 20<sup>th</sup> day of August, 2010.

Adam Teitzman, Esq.  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Mr. Thomas M. McCabe  
TDS Telecom/Quincy Telecom  
Suite 3, Box 329  
1400 Village Square Boulevard  
Tallahassee, FL 32312-1231

Mr. Robert M. Ellmer  
FairPoint Communications  
502 Cecil G. Costin, Sr. Blvd.  
Port St. Joe, FL 32456-1754

Mr. James White  
Windstream Florida, Inc.  
4651 Salisbury Road, Suite 151  
Jacksonville, FL 32256-6187

Ms. Angela McCall  
Frontier Communications of the South LLC  
300 Bland Street  
Bluefield, WV 24701-3020



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Floyd R. Self

Ms. Donna J. Marreel  
ITS Telecommunications Systems, Inc.  
P.O. Box 277  
Indiantown, FL 34956-0277

Ms. Deborah Nobles  
NEFCOM  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073-9409

Smart City Telecom  
P.O. Box 22555  
Lake Buena Vista, FL 32830-2555

**AFFIDAVIT**

State of Washington )  
 ) ss:  
County of King )

BEFORE ME, the undersigned authority, personally appeared H. Skip Cornett, known to me to be a credible person and of lawful age, who deposed and said:

My name is H. Skip Cornett, I am employed as Vice President of Tax at T-Mobile USA, Inc., the parent company of T-Mobile South LLC, doing business as T-Mobile (“T-Mobile or the “Company”). I am an officer of T-Mobile and am authorized to provide this affidavit on behalf of the Company. This affidavit is being given to support the certification of the Florida Public Service Commission (“Commission”) as contemplated in 47 C.F.R. §§ 54.209, 54.313, 54.314, 54.809 & 54.904.

Company hereby certifies the following:

1. T-Mobile, a commercial mobile radio service provider as defined under 47 C.F.R. §20.3, was recently designated as an Eligible Telecommunications Carrier (“ETC”) and authorized by the Commission on August 18, 2010 and August 19, 2010, in Docket No. 090510-TP (Order No. PSC-10-0478-PAA-TP) and Docket No. 090507-TP (Order No. PSC-10-0475-PAA-TP), to receive both rural and non-rural high-cost universal service funds in certain delineated Incumbent Local Exchange Carrier (“ILEC”) wire centers within the state of Florida.
2. As a result of a clerical error, one rural ILEC wire center was mistakenly omitted from the list in Attachment A incorporated into the Commission Order in Docket No. 090510-TP (Order No. PSC 10-0478-PAA-TP) and another wire center was incorrectly duplicated. Specifically, T-Mobile intended to include rural ILEC wire center LKPCFLXA and did not intend to duplicate LKHLFLXA. T-Mobile has separately petition the Commission to correct this oversight. Accordingly, this annual certification and all future T-Mobile certifications will include the correct rural wire center LKPCFLXA (subject to Commission approval) in addition to all other authorized rural ILEC wire centers and omit the duplicated wire center.
3. T-Mobile will only use the federal high cost support it receives during 2011 for the provision, maintenance and upgrading of facilities and service for which such support is intended.
4. In support of it’s applications to be designated as an ETC in Docket No. 090507-TP and 090510-TP, T-Mobile submitted to the Commission on April 26, 2010, a five-year service improvement plan (“SIP”) commencing in 2010 and going through 2014, along with a request for confidential treatment under Section 364.183(1) of the Florida Statutes.

T-Mobile's SIP details annual expenditures that will greatly exceed projected annual 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 and non-rural areas of Florida and improving customer experience through signal quality, capacity and other network enhancements. T-Mobile herein incorporates the previously submitted SIP in support of this certification.

5. T-Mobile follows appropriate procedures for network outage reporting consistent with 47 C.F.R. Part 4. Since the Commission's designation of T-Mobile as an ETC was subsequent to the reportable period of March 1, 2009 through March 1, 2010, T-Mobile does not have any FCC outages to report. However, T-Mobile certifies that it will track on a going-forward basis all reportable network outages as of the effective date of our ETC designation and report accordingly in subsequent annual reports. 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. T-Mobile will remain vigilant to prevent outages in the future.
6. T-Mobile tracks customer complaints and requests for service. Since T-Mobile's designation as an ETC became effective on August 18, 2010 and August 19, 2010, T-Mobile does not have any customer complaints or requests for service, as defined by 47 C.F.R. § 54.209(a)(3), in unserved or underserved areas from potential customers in Florida during the reportable period. In future annual reports and updates, as necessary, T-Mobile will report customer complaints and requests for service and the steps taken to respond to them.
7. T-Mobile is a signatory to the CTIA Consumer Code for Wireless Service, which is the applicable service quality and consumer protection standard for wireless carriers, and has been certified by CTIA as being compliant with the code.<sup>1</sup> T-Mobile also provides its customers with other service quality and consumer protection benefits that have resulted in the Company being consistently recognized as one of the best in customer service. T-Mobile hereby certifies that it is complying with applicable service quality standards and consumer protection rules for the areas in which it was designated as an ETC in Florida.
8. T-Mobile is able to function in emergency situations as set forth in Section 54.201(a)(2), which includes "a demonstration that it 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

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<sup>1</sup> See CTIA Consumer Code for Wireless Service, *available at* [http://files.ctia.org/pdf/The\\_Code.pdf](http://files.ctia.org/pdf/The_Code.pdf). Signatories to the CITA Consumer Code agree to: (1) disclose rates and terms of service to consumers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6); separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of customer privacy. T-Mobile was certified by CTIA as being compliant with this code on June 22, 2010.

situations.”<sup>2</sup> 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.
8. T-Mobile makes available several different rate plans with varying amounts of local usage and different calling areas that are comparable to the offerings of the ILECs. Attached as Exhibit A is a list of some of T-Mobile’s currently offered rate plans. T-Mobile hereby certifies that it is offering a local usage plan comparable to that offered by the ILECs in the areas in which it was designated as an ETC.
9. T-Mobile recognizes that the Commission may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within its service area.

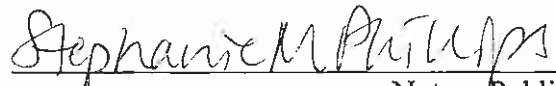
  
Signature

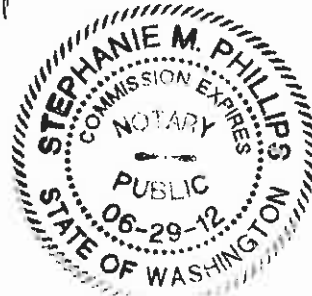
8/18/10  
Date

H. Skip Cornett

Business Address:  
T-Mobile USA, Inc.  
12920 SE 38<sup>th</sup> Street  
Bellevue, WA 98006

Subscribed and sworn to before me this 18<sup>th</sup> day of August, 2010.

  
Notary Public



<sup>2</sup> 47 C.F.R. § 54.202(a)(2).



**Even More Rate Plans**  
(Even More Even More Plus)

Rate Plan	Highlights	Total Monthly Charge - Even More*	Total Monthly Charge - Even More Plus**
<b>TALK (Individual)</b>			
500 Talk	500 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$39.99	\$29.99
1000 Talk	1000 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$49.99	\$39.99
Unlimited Talk	Unlimited Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
<b>TALK &amp; TEXT (Individual)</b>			
500 Talk & Text	500 Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$49.99	\$39.99
100 Talk & Text	1000 Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
Unlimited Talk & Text	Unlimited Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$69.99	\$59.99
<b>TALK, TEXT, &amp; WEB (Individual)</b>			
500 Talk, Text, & Web	500 Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$59.99
1000 Talk, Text, & Web	1000 Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$89.99	\$69.99
Unlimited Talk, Text & Web	Unlimited Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99

**Even More Rate Plans**  
(Even More Even More Plus)

**\*Even More**

Handset discount available  
2 year contract required  
Finance handset (up to 4 months)  
No overage alerts  
No fee to migrate

**\*\*Even More Plus**

No subsidized handset pricing  
No contract  
Finance handset (up to 20 months)  
Overage alerts  
May be a fee to migrate

Rate Plan	Highlights	Total Monthly Charge - Even More*	Total Monthly Charge - Even More Plus**
<b>TALK (Family - 2 lines)</b>			
750 Talk	750 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$59.99	\$49.99
1500 Talk	1500 Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$59.99
Unlimited Talk	Unlimited Whenever Minutes Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99
<b>TALK &amp; TEXT (Family - 2 lines)</b>			
750 Talk & Text	750 Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$79.99	\$69.99
1500 Talk & Text	1500 Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$99.99	\$79.99
Unlimited Talk & Text	Unlimited Whenever Minutes Unlimited messaging Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$119.99	\$99.99
<b>TALK, TEXT, &amp; WEB (Family - 2 lines)</b>			
750 Talk, Text, & Web	750 Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$139.99	\$109.99
1500 Talk, Text, & Web	1500 Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$159.99	\$119.99
Unlimited Talk, Text & Web	Unlimited Whenever Minutes Unlimited messaging Unlimited Web Unlimited nights and weekends Unlimited T-Mobile to T-Mobile	\$179.99	\$139.99

\*Same plan details apply as listed on "individual" tab

<b>Additional Lines (maximum of 5 lines allowed on a family plan)</b>	
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Add a line and share minutes and messages	\$5.00
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Additional line with Unlimited Web	\$30.00
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