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IDAHO PUBLIC
UTILITIES COMMISSION

Mary Ellen Hassell
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Via E-Filing

June 28, 2023

Ms. Jan Noriyuki, Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd, Bldg. 8 Suite 201-A
Boise, ID 83714

Re: Assurance Wireless USA, L.P. Annual Certification Filing for Docket GNR-T-23-01

Dear Ms. Noriyuki,

Assurance Wireless USA, L.P. (“Assurance Wireless”) submits the attached Certification Compliance Letter, Emergency Operations Plan and Signed Affidavit in support of its Annual Lifeline Report for filing in Docket GNR-T-23-01.

Assurance Wireless has filed Form 481 (47 C.F.R. § 54.313) with USAC.

If you have any questions or need additional information regarding this filing, please contact me.

Sincerely,

/s/ Mary Ellen Hassell



12920 SE 38th Street, Bellevue, WA 98006
www.t-mobile.com



June 8, 2022

Mr. Neville Ray
President, Technology
T-Mobile USA
12920 SE 38th Street
Bellevue, WA 98006-1350

Dear Neville:

Congratulations! This letter is to notify you that T-Mobile USA, Metro by T-Mobile (“T-Mobile”) and Assurance Wireless have completed the certification process for the CTIA Consumer Code for Wireless Service (“Voluntary Consumer Code”) for the period of January 1, 2022 through July 1, 2023, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, T-Mobile is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of T-Mobile review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. We are providing two specimens (color and black/white) of the Seal for T-Mobile’s use on its website or collateral materials. If you should have any questions concerning the certification process or use of the Seal, please contact Kathryn Dall’Asta, CTIA’s Deputy General Counsel, at (202) 736-3677 or kdallasta@ctia.org.

CTIA commends T-Mobile for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with T-Mobile on this important industry initiative.

Sincerely,

A handwritten signature in black ink that reads "M. Baker" followed by a horizontal line.

Meredith Attwell Baker
President & Chief Executive Officer

c.c. David Edwards, Managing Corporate Counsel
Molly Malouf, Senior Director, Legal Affairs
Andrea Talaga, Paralegal, Marketing Communications

Attachment



CONSUMER CODE FOR WIRELESS SERVICE

CONSUMER CODE CERTIFICATION SEAL

TERMS OF USE (2022)

Subject to your compliance with the terms contained herein (“**Terms**”), CTIA-The Wireless Association (“**CTIA**”) hereby grants your organization (“**Company**”) a non-exclusive, world-wide, royalty-free license (“**License**”) to use CTIA’s Consumer Code Certification Seal (“**Seal**”) to represent that Company voluntarily adopts and adheres to the CTIA Consumer Code for Wireless Service for the period of January 1, 2022 through July 1, 2023 (“**Voluntary Consumer Code**”) and has certified such to CTIA. The Seal is attached hereto at Exhibit A and fully incorporated herein by reference.

This License shall become effective immediately upon the date of your receipt of CTIA’s written acknowledgement of Company’s certification and shall remain in effect until June 30, 2023. CTIA permits the use of the Seal, solely in connection with the Voluntary Consumer Code program. Company may use the Seal in Company’s advertising, promotional materials, other literature, or on Company’s website(s) to indicate its voluntary compliance with the Voluntary Consumer Code.

Use of the Seal shall not be misleading as to the extent of Company’s voluntary support and participation in the Voluntary Consumer Code program. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon the written request of CTIA. Company shall immediately cease use of the Seal upon receipt of CTIA’s written notice to do so. If at any time, Company’s practices and policies fail to comply, or CTIA has reason to believe that such practices and policies fail to comply with the Voluntary Consumer Code, Company will cease use of the Seal and all rights and permissions will immediately revert to CTIA.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the Voluntary Consumer Code.

Use of the Seal for other purposes than those stated in these Terms is an unauthorized use of the Seal and is strictly prohibited, unless otherwise agreed upon by CTIA in writing.

This License may be renewed annually subject to Company’s successful completion of the certification process.

Use of the Seal constitutes acceptance of these Terms.

EXHIBIT A



EMERGENCY OPERATIONS PLAN

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 situations.”¹ 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-term 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.

¹ 47 C.F.R. § 54.202(a)(2).

T-Mobile USA Business Continuity Program Summary

T-Mobile USA, Inc. (“T-Mobile”) is committed to safeguarding the interests of our customers, employees and stakeholders in the event of an emergency or significant business disruption. As a result T-Mobile has and maintains an enterprise-wide Business Continuity Program designed to provide effective responses to a wide variety of disruptive events. T-Mobile’s Business Continuity Program is centralized in its design and decentralized in its implementation, promoting active involvement in the program by all lines of business in all locations.

Primary components of the T-Mobile Business Continuity Program include:

- Enterprise Business Continuity Project Initiation and Oversight
- Risk Evaluation and Controls
- Business Impact Assessment and Analysis
- Business Continuity and Disaster Recovery Strategic Direction
- Crisis Response, Emergency Response, and Operations
- Business Continuity Plan Development, Maintenance, and Exercising
- Awareness and Training Programs
- Public Relations and Crisis Response and Resumption Coordination
- Coordination with External Agencies

A team of certified Business Continuity professionals is responsible for documenting and developing enterprise standards, processes, and policies for all business continuity and disaster recovery needs throughout T-Mobile. This group supports the line of business continuity planning and defines enterprise tools and methodologies. This level of consistency across the lines of business enhances T-Mobile’s overall planning and resumption efforts.

T-Mobile also maintains backup and alternate power sources at mission critical locations, and has information processing and telecommunications back-up sites that provide redundancy that is important to protecting key business information and services. Business Continuity Plans are housed in a centralized online repository, accessible to employees in office and remotely through a web browser. Additionally, hard copies of plans are available at multiple sites throughout the enterprise.

The T-Mobile USA Business Continuity Program is designed and maintained to proactively mitigate the risk of threats to T-Mobile’s customers, employees, and stakeholders. As such the program is revised and updated as needed to address potential and emerging hazards.

For more information on the T-Mobile Business Continuity Program, please send inquiries to: business.continuity@t-mobile.com

State of Kansas)
) SS
County of Johnson)

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,
AND USE OF FEDERAL HIGH-COST SUPPORT.

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETC) certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Assurance Wireless USA, L.P., an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. N/A
3. Assurance Wireless USA, L.P. is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.202(a)(2).
5. N/A
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.

Larry Weians, Vice President
Name/Title

[Signature]
Date

SUBSCRIBED AND SWORN to before me
this 22nd day of June 2023

Susan D. Brown

Notary Public for T-Mobile, residing
at 1660 Sprint Pkwy, Overland Park, KS
My Commission
expires 5/13/2024

