

T: 775-527-4252 david.collier@att.com



July 31, 2024

Ms. Breanne Potter Commission Secretary Public Utilities Commission of Nevada 1150 East William Street Carson City, NV 89701-3109

Re: Application of AT&T Nevada for Relief from its Designation as a Provider of Last Resort in Portions of its Service Territory Pursuant to NRS 704.68886

Dear Ms. Potter:

Enclosed for filing is an application of Nevada Bell Telephone Company ("AT&T Nevada") for a Change in its Provider of Last Resort Service Area pursuant to NRS 704.68886.

Also enclosed as Exhibit 9 of the Application is a draft public notice pursuant to NAC 703.162.

Note that Nevada Bell Telephone Company's name changed to Nevada Bell Telephone Company, LLC on May 1, 2024. On July 17, 2024, the Commission approved this name change contingent on a single compliance item involving the filing of Certificates of Business Name Change from seventeen counties within 90 days of the order. We will continue filing on behalf of Nevada Bell Telephone Company in this docket until a new Certificate of Public Convenience and Necessity is issued to Nevada Bell Telephone Company LLC upon satisfying the compliance item.

If you have any questions concerning this matter please call me to discuss. I can be reached at (775) 527-4252.

Sincerely,

Yours truly, AT&T NEVADA

David A. Collier

Lead Regulatory Relations

Attachments

cc: Bureau of Consumer Protection (bcpserv@ag.nv.gov)
PUCN Staff Counsel (pucn.sc@puc.nv.gov)

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

1		
2		
3	Application of Nevada Bell Telephone) Company d/b/a AT&T Nevada and)	Docket No. 24-
4	AT&T Wholesale for a Change in its Provider of Last Resort Service Area)	
5	Pursuant to NRS 704.68886.	
6)	
7		
8	AT&T NEVADA'S APPLICATION FOR A CHANGE IN ITS	
9	PROVIDER OF LAST RESORT SERVICE AREA	
.0		
	Pursuant to NRS 704.68886, Nevada Bell Telephone Company, d/b/a AT&T Nevada	
.1	and AT&T Wholesale ("AT&T Nevada") submits this Application for a Change in its	
.3	Provider of Last Resort ("POLR") Service Area obligation ("Application").	
4	I. AT&T Nevada Contacts	
5	Correspondence or communications regarding this Application should be addressed to:	
6	Anna Kapetanakos	David Collier
.0	AVP - Senior Legal Counsel	Lead, Regulatory Relations
.7	AT&T Nevada 2101 E El Segundo Blvd	AT&T Nevada P.O. Box 11010
	El Segundo, CA 90245-4518	Reno, NV 89520
.8	(415) 694-1530	(775) 527-4252
.9	ak6252@att.com	dc1787@att.com
20		
21		
22	On May 1, 2024, Nevada Bell Telephone Company changed its name to Nevada Bell Telephone Company, LLC On July 17, 2024, the Public Utilities Commission of Nevada ("Commission") granted Nevada Bell Telephone	
	Company's request for a name change contingent on a single compliance item involving the filing of Certificates	
23	of Business Name Change from seventeen counties within 90 days of the order. A new Certificate of Public Convenience and Necessity will be issued to Nevada Bell Telephone Company LLC upon completion of the	
24	compliance item. See Docket No. 24-05006	
	https://ecms.nv.gov/puc/api/Document/AVzLatWdY3Peeo0xeyVM5InnctMR8W6%C3%89iUYFb7Vv0wvQ8JT	
25	n6LpBRpqnyWysAhNYWBhh%C3%81vo90iR9RMw2dl	FEKHI%3D/?OverlayMode=V1ew.

II. Introduction

AT&T Nevada hereby applies for tailored relief from its obligations and status as a POLR in portions of its service territory located in Lander and White Pine counties.² Relief is sought under NRS 704.68886 on the basis that two or more providers that utilize a wireless technology are capable of providing alternative voice services to the entire area that is the subject of this Application.

As described in detail below, this Application meets all the necessary requirements of NRS 704.68886 by demonstrating 1) the presence of multiple Commercial Mobile Radio Service ("CMRS") providers capable of providing alternative voice service in the POLR areas where AT&T Nevada seeks relief pursuant to NRS 704.68886(1)(b), 2) coverage maps that provide accurate and sufficient detail to identify the exact boundaries of the POLR area at issue herein pursuant to NRS 704.68886(2), and 3) timely distribution of required notifications to affected customers and applicable public safety answering points under NRS 704.68886(4). This filing shows ample grounds for approving this Application once all required meetings as set forth in NRS 704.68886(6) and duly noticed consumer sessions required under NRS 704.68886(7) are completed.

This Application does not seek comprehensive POLR relief at this time and excludes certain POLR areas in White Pine, Lander, Nye, Mineral, Pershing, and Washoe counties. Furthermore, this Application does not involve a discontinuance of basic network service for any customer served by AT&T Nevada. Service to AT&T Nevada's existing customers will not be impacted by this POLR relief request.

² The impacted exchanges include Battle Mountain, Austin, McGill, Lund, Preston, Baker, Cherry Creek, and Lages.

III. NRS 704.68886 provides AT&T Nevada a clear Pathway for Eliminating existing POLR Designation and Obligations in those Areas served by at least Two Wireless Providers that offer Alternative Voice Service.

NRS 704.68886(1) states that an application for relief from obligations and status as a POLR is appropriate where alternative voice service is provided by:

(b) On or after June 1, 2015, two or more providers that utilize a wireless technology and that are capable of providing alternative voice service to the entire area for which relief is sought.

Additionally, NRS 704.68886(15) defines "alternative voice service" as:

- (a) "Alternative voice service" means a retail voice service made available through any technology or service arrangement other than satellite service that provides:
 - (1) Voice-grade access to the public switched telephone network; and
 - (2) Access to emergency 911 service.

AT&T Nevada has previously sought and was granted tailored relief from POLR designation under NRS 704.68886(1)(b).³ On August 31, 2016, the Public Utilities Commission of Nevada ("Commission") granted POLR relief in multiple areas of its exchange boundaries by approving a stipulation between AT&T Nevada and Staff that, among other facts, established:

- 1) Multiple wireless carriers were currently registered with the Commission as Commercial Mobile Radio Service ("CMRS") providers and capable of providing alternative voice service to portions of the Amended Area for Relief;
- 2) At least two or more of those CMRS providers utilized a wireless technology, and the Parties believed that those providers were capable of providing alternative voice service to each portion of the Amended Area for Relief; ... ⁴

AT&T met all the necessary requirements of NRS 704.68886(1)(b) with 5 facilities-based providers and 11 resellers. CPCN 616, Sub 23, issued on October 31, 2016, approved

³ See Docket No. 16-03021 at <u>https://ucweb1.state.nv.us/PDF/AxImages/DOCKETS_2015_THRU_PRESENT/2016-3/14857.pdf.</u>

⁴ See https://ucweb1.state.nv.us/PDF/AxImages/DOCKETS 2015 THRU PRESENT/2016-3/13571.pdf.

updated maps and legal descriptions of AT&T Nevada's then-revised POLR service areas.⁵ Since 2016, AT&T has been granted full POLR relief in eleven of the seventeen counties and partial relief in the remaining six counties.

IV. The FCC's National Broadband Map ("FCC Map") Data shows Multiple Wireless Carriers Serving the Areas in which AT&T seeks POLR Relief.

A. The FCC Map is the most accurate tool for identifying Broadband Service Availability.

The FCC Map offers data on its public facing map and available for download⁶ that identifies, among other broadband services, mobile wireless voice and broadband coverage availability at individual location points across Nevada, as reported by Internet Service Providers (ISPs) in the FCC's Broadband Data Collection system ("BDC"). In accordance with BDC's data specifications, facilities-based wireless service providers submit and certify coverage data⁷ in biannual filings. These filings and associated availability data are subject to the FCC's public challenge process, as well as FCC verification inquiries and audits.

The FCC's Mobile Broadband Map ("FCC Mobile Map") shows 3G,⁸ 4G, and 5G coverage of each mobile provider across the United States. Facilities-based mobile wireless providers are required to submit data for each distinct technology, where they make mobile service available, including coverage maps for 3G, 4G LTE, 5G-NR, and voice technologies. Wireless providers report mobile broadband coverage data with propagation maps and

⁵ See https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS 2015 THRU PRESENT/2016-3/16307.pdf.

⁶ See https://broadbandmap.fcc.gov/data-download/nationwide-data?version=dec2023.

⁷ See What Do I need to file? at https://www.fcc.gov/BroadbandData/filers.

⁸ Carriers do not report 3G technology if discontinued.

propagation model details for each network technology as well as signal strength heat maps.⁹ The coverage areas reflect where consumers should be able to connect to the mobile network to access broadband and voice services when outdoors or in a moving vehicle.

The FCC's mapping requirements were overhauled in 2020 to create more granular and reliable maps and include a public challenge process that enables continuous improvement. Prior FCC broadband maps (known as "Form 477") relied on data submitted at the census block level which provided only a "broad brush" picture of service availability. The current FCC Map formulates detailed data from providers' propagation models into geographic coverage maps with carrier and technology-specific facts. ¹⁰ As a result, the FCC Map has become a powerful tool enabling users to identify fixed and wireless broadband service availability across the country down to a specific street address or latitude/longitude coordinate level.

B. Attached to AT&T Nevada's Application are forty nine maps illustrating its POLR areas overlayed with the FCC Mobile Map's coverage data.

The data in the FCC Mobile Map presents information by provider and technology type for each state in the US and displays mobile broadband coverage data using a standardized lattice of hexagonal polygons with a length of about 700' on each side. **Exhibits**1-5 contain AT&T Nevada POLR maps overlayed with 4G LTE, 5G-NR (35/3 Mbps), and 5G-NR (7/1 Mbps) technology data of AT&T, Inc., 11 T-Mobile USA, Inc., and Verizon Communications Inc., downloaded directly from the FCC Mobile Map. In compliance with

2.2.

⁹ For more information on BDC's data specification see https://us-fcc.app.box.com/v/bdc-availability-spec.

¹⁰ See https://www.fcc.gov/BroadbandData.

¹¹ Mobile broadband coverage data is submitted to the BDC on behalf of AT&T, Inc.'s subsidiary New Cingular Wireless PCS LLC d/b/a AT&T Mobility, also known as AT&T Wireless ("AT&T Mobility").

NRS 704.68886(2)(a), the attached maps cover the entire area for which relief is sought and identify separately the existence of wireless providers of alternative voice service as follows: 12

- Exhibit 1. Map of POLR areas at a statewide level;
- Exhibit 2. Maps of POLR areas at the county level;
- **Exhibit 3**. Street level maps of POLR areas at scale of 1:288,000;
- Exhibit 4. Street level maps of POLR areas at scale of 1:72,000; and
- **Exhibit 5**. Coverage maps of alternative voice service providers located in areas relief is requested.

C. Exhibit 5 identifies separately each alternative voice service provider relied on to satisfy the standard under NRS 704.68886(1)(b).

This Application is based on the presence of at least one of the three facilities-based providers combined with one reseller of the facilities-based coverage. Accordingly, **Exhibit 5** identifies one facilities-based provider and at least one reseller for each area POLR relief is sought. **Exhibits 3-4** provide sufficient detail to identify the exact boundary by street. These providers are registered with the Public Utilities Commission as Commercial Mobile Radio Service providers and capable of providing alternative voice service as defined in NRS 704.68886(15)(a):

- 1) AT&T Mobility¹³
- 2) T-Mobile¹⁴
- 3) Verizon¹⁵

¹² The Declaration of Ty Shalley, attached as **Exhibit 6**, describes how the FCC Mobile Map data was used to map available wireless coverage in the subject POLR areas and verifies the accuracy of the mapping data used in this Application.

¹³ Facilities-based provider, CMRS 47 "New Cingular Wireless PCS LLC d/b/a AT&T Mobility."

¹⁴ Facilities-based provider, CMRS 37 "T-Mobile West LLC d/b/a T-Mobile".

¹⁵ Facilities-based provider, CMRS 20, 39, 32, 120, 31, 198 "Airtouch Cellular, AllTel Corporation, Cellco Partnership, Rural Cellular Corporation, Sacramento Valley Limited Partnership, and Bell Atlantic Mobile Systems LLC d/b/a Verizon Wireless".

- 4) Tracfone Wireless¹⁶
- 5) Consumer Cellular¹⁷
- 6) Mint Mobile¹⁸
- 7) Dish Wireless LLC¹⁹
- 8) Cricket Wireless²⁰

V. AT&T Nevada Notifications, Consumer Participation, and Government Agency Meetings in this Docket.

A. Notification Requirements

NRS 704.68886(4) requires the applicant to provide written notice of this docket to all current landline customers located in the area for which relief is sought within 30 days of filing this Application. Attached as **Exhibit 7** contains AT&T Nevada's customer notifications. These notifications are being delivered to residential customers in a bill message beginning July 29, 2024, and will be sent to business customers in August, 2024.²¹

Resale provider, CMRS 95 Sub 1 "Tracfone Wireless, Inc. d/b/a Safelink Wireless, Simple Mobile, NET10, Total Wireless, Page Plus Cellular, TelCel, and Straight Talk"). Tracfone provisions resold wireless service using AT&T Mobility, T-Mobile and Verizon networks.

Tracfone Wireless is designated as an Eligible Telecommunications Carrier in AT&T Nevada's entire service area under the dba "SafeLink Wireless." See https://pucweb1.state.nv.us/PDF/AxImages/DOCKETS 2005 THRU PRESENT/2009-10/34799.pdf.

¹⁷ Resale provider, CMRS 55. See https://www.consumercellular.com/coverage. Consumer Cellular provisions resold service using AT&T Mobility and T-Mobile networks.

¹⁸ Resale provider, CMRS 194. See https://www.mintmobile.com/coverage/. Mint Mobile provisions resold service using T-Mobile's network.

Presale provider, CMRS 202, See https://www.boostmobile.com/coveragemap xp?bs=1&utm campaign=OG FY24 MOBILE BING SEM BR CONV NCORE NA NA POSTPAID&utm source=bing&utm medium=cpc&utm content485132216%7c1143493827572918%7c71468521309031&msclkid=22392c54a0001154b0854af251f82a0a&utm source=bing&utm medium=cpc&utm campaign=OG FY24 MOBILE BING SEM BR CONV NCORE NA NA POSTPAID&utm term=dish%20wireless%20plans&utm_content=Boost%20Infinite_Dish. Dish Wireless LLC provisions resold service using the AT&T Mobility and T-Mobile network.

²⁰ Resale provider, CMRS 144 Sub 1, See https://www.cricketwireless.com/map.html. Cricket Wireless provisions resold service using AT&T Mobility's network.

²¹ Notifications will be made electronically to those customers who receive their bill in electronic form.

NRS 704.68886(4) also requires the applicant to provide a similar written notice of this docket to each public safety answering point ("PSAP") located in the area for which relief is sought within 30 days of filing this Application. Attached as **Exhibit 8** contains AT&T Nevada's notice to the PSAPs located in Lander and White Pine counties. This notice will be mailed on or before August 9, 2024.

NAC 703.162 requires the applicant to file a draft public notice with its application, that includes information about its filing and a description of the relief being requested.

Attached as **Exhibit 9** is AT&T Nevada's draft notice.

B. Consumer Sessions

NRS 704.68886(7) requires the applicant, in collaboration with the Commission, to schedule and conduct at least one consumer session in each county in which applicant seeks relief. AT&T Nevada seeks relief in two counties and will work with the Commission to schedule and conduct public meetings in Battle Mountain and Ely within 120 days of filing this Application.

C. Meetings with Government Representatives and Consumer Advocates

NRS 704.68886(6) specifies the category of government/agency representatives and consumer advocates the applicant must meet with concerning this docket. AT&T Nevada met with Commission Staff on June 27, 2024, and the Bureau of Consumer Protection on June 23, 2024. It is reaching out and preparing to meet with representatives from the following agencies within 30 days of filing this Application:

- 1) PSAPs whose jurisdictions include Lander and White Pine counties.
- 2) Local law enforcement whose jurisdictions include Lander and White Pine counties.

VI. CONCLUSION

This Application meets all the necessary requirements of NRS 704.68886 and AT&T Nevada is entitled to relief from its designation as a POLR in the areas identified in this Application. AT&T Nevada respectfully asks the Commission to approve this Application upon completion of all required meetings as set forth in NRS 704.68886(6) and two duly-noticed consumer sessions required by NRS 704.68886(7) on the basis that it has satisfied the requirements of NRS 704.68886 and has shown that at least two providers that utilize a wireless technology and are capable of providing alternative voice service exist throughout the entire area for which relief is sought. AT&T Nevada's POLR designation should be removed from all areas that are the subject of this Application.

Respectfully submitted this 31st day of July, 2024.

By:

Anna Kapetanakos

AVP - Senior Legal Counsel

AT&T Nevada

2101 E El Segundo Blvd

El Segundo, CA 90245-4518

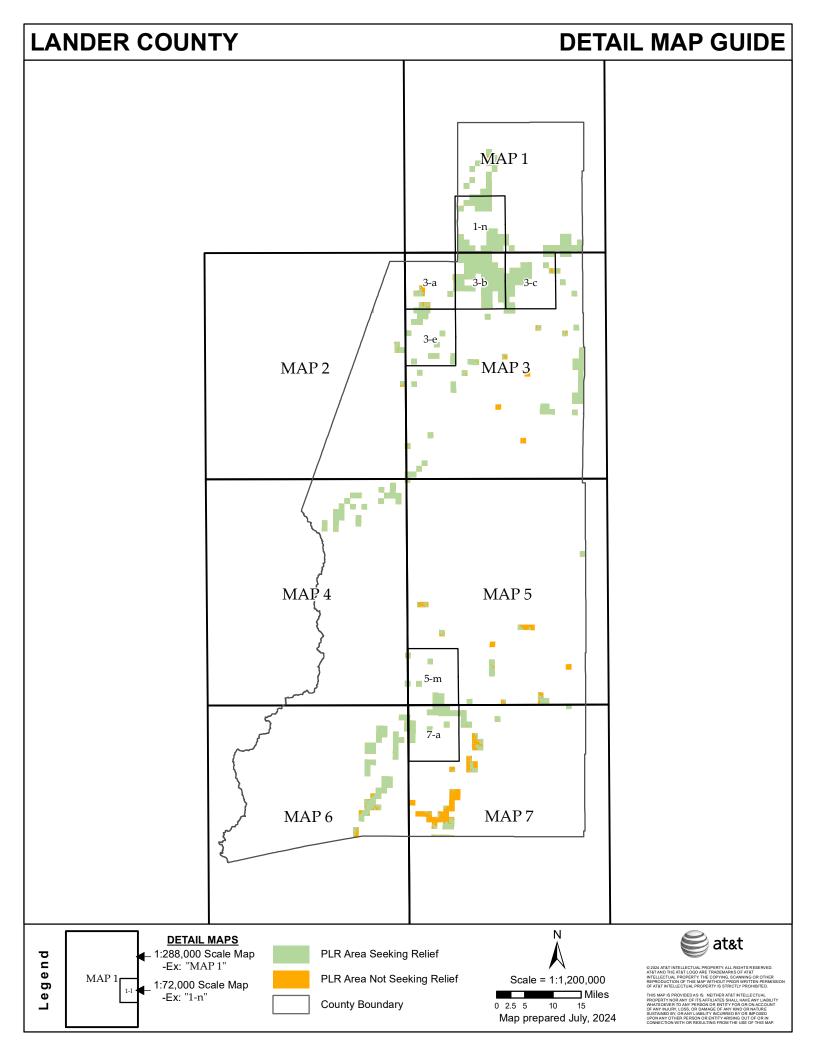
(415) 694-1530

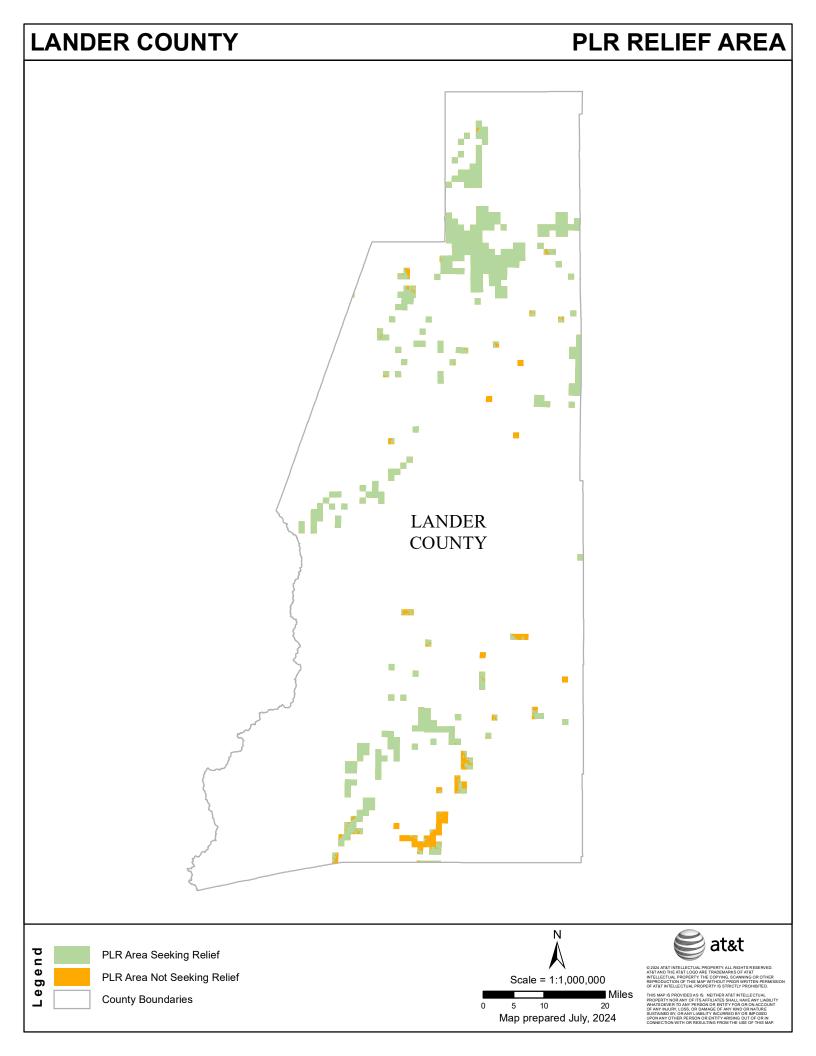
ak6252@att.com

Exhibit 1 Map of POLR areas at a Statewide Level

STATE OF NEVADA PLR RELIEF AREA HUMBOLDT ELKO PERSHING WASHOE LANDER **EUREKA** WHITE PINE CHURCHILL CARSON CITY DOUGLAS MINERAL NYE **ESMERALDA** LINCOLN CLARK egend PLR Area Seeking Relief PLR Area Not Seeking Relief Scale = 1:3,500,000 **County Boundaries** 0 10 20 Map prepared July, 2024

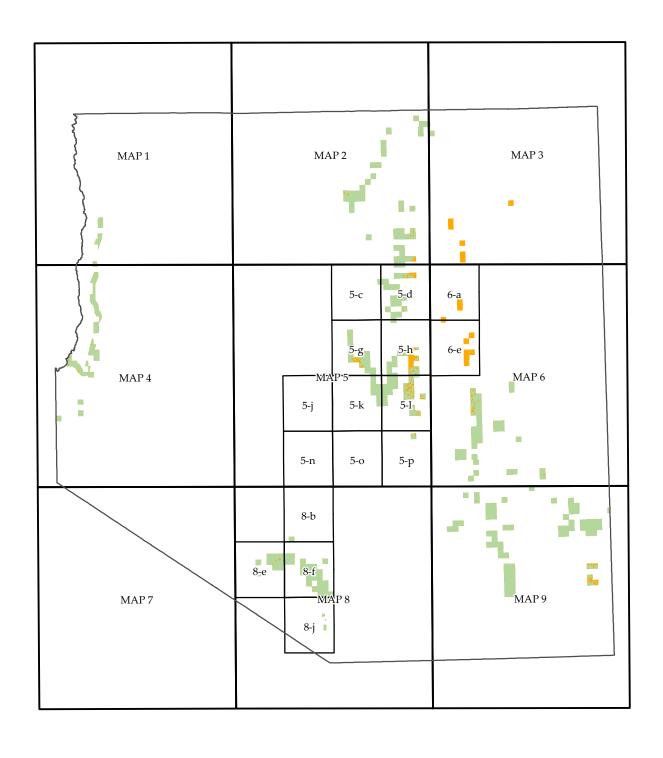
Exhibit 2 Map of POLR areas at the County Level

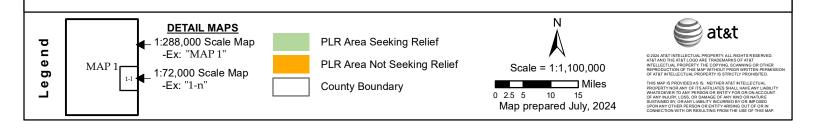




WHITE PINE COUNTY

DETAIL MAP GUIDE





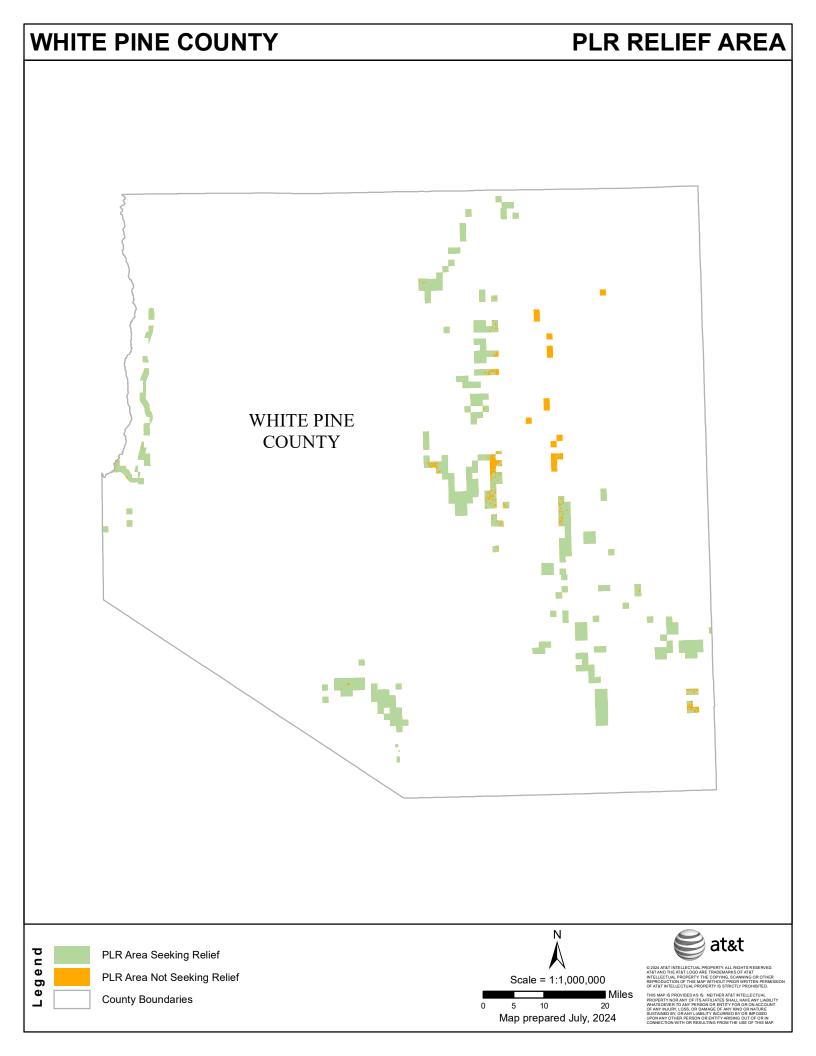
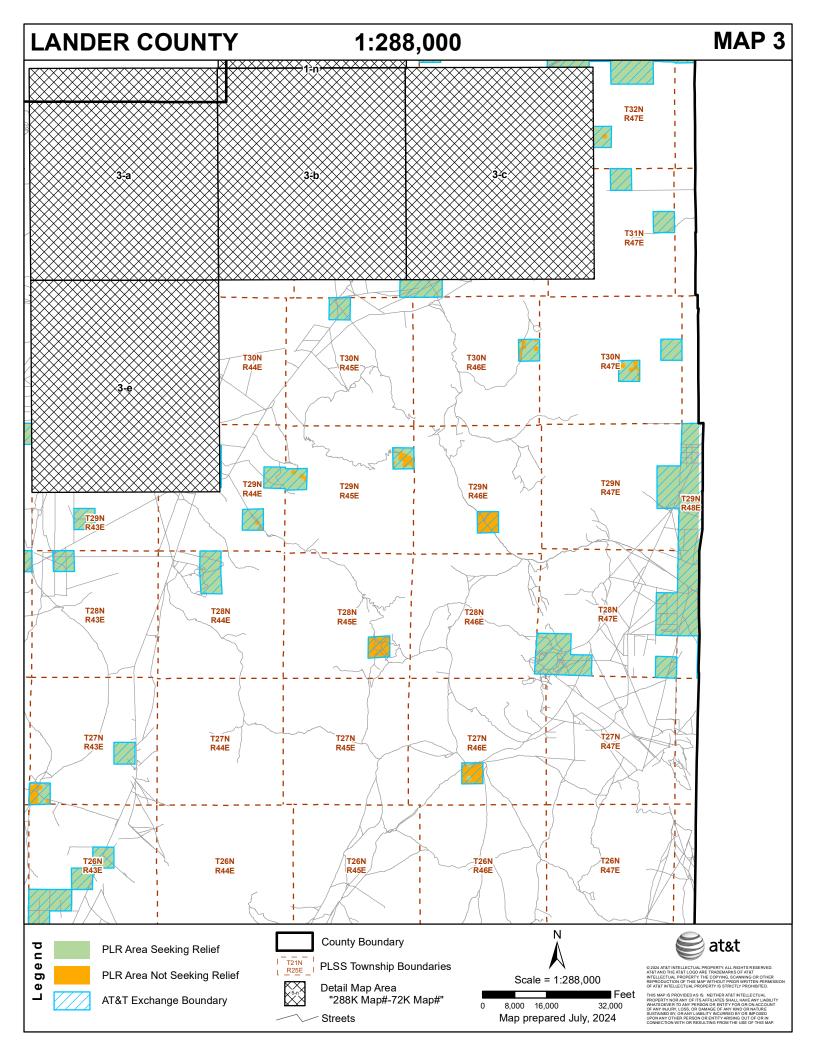
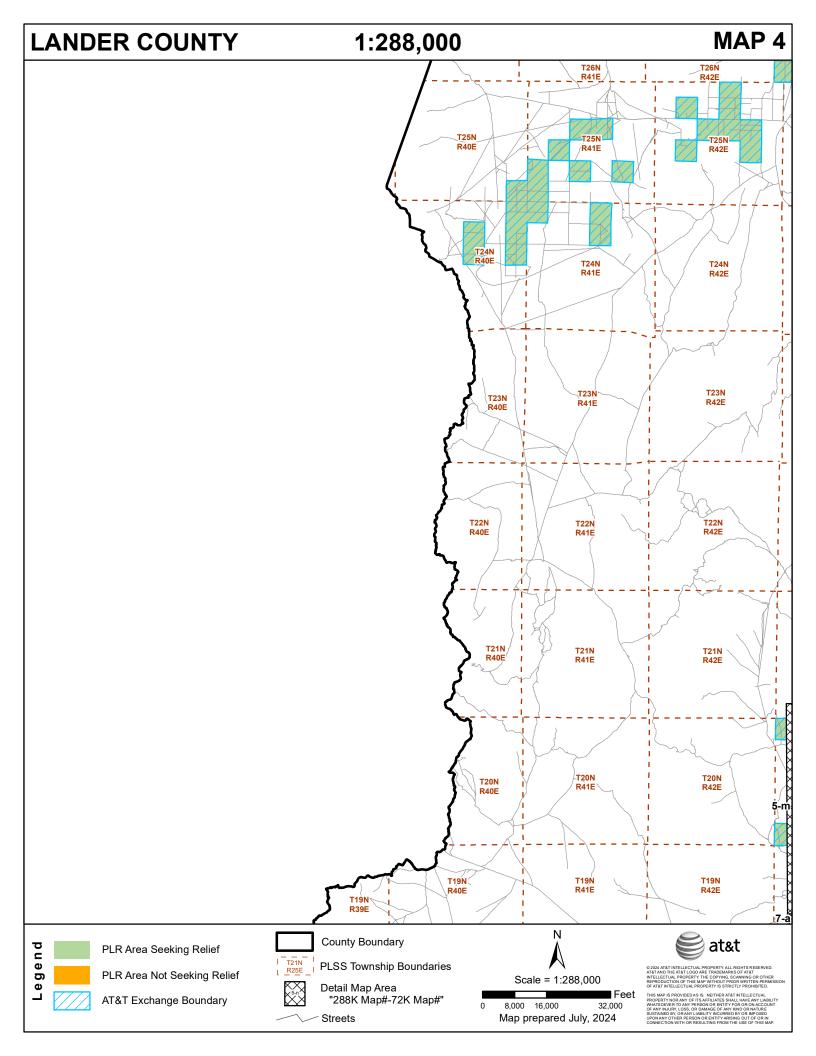
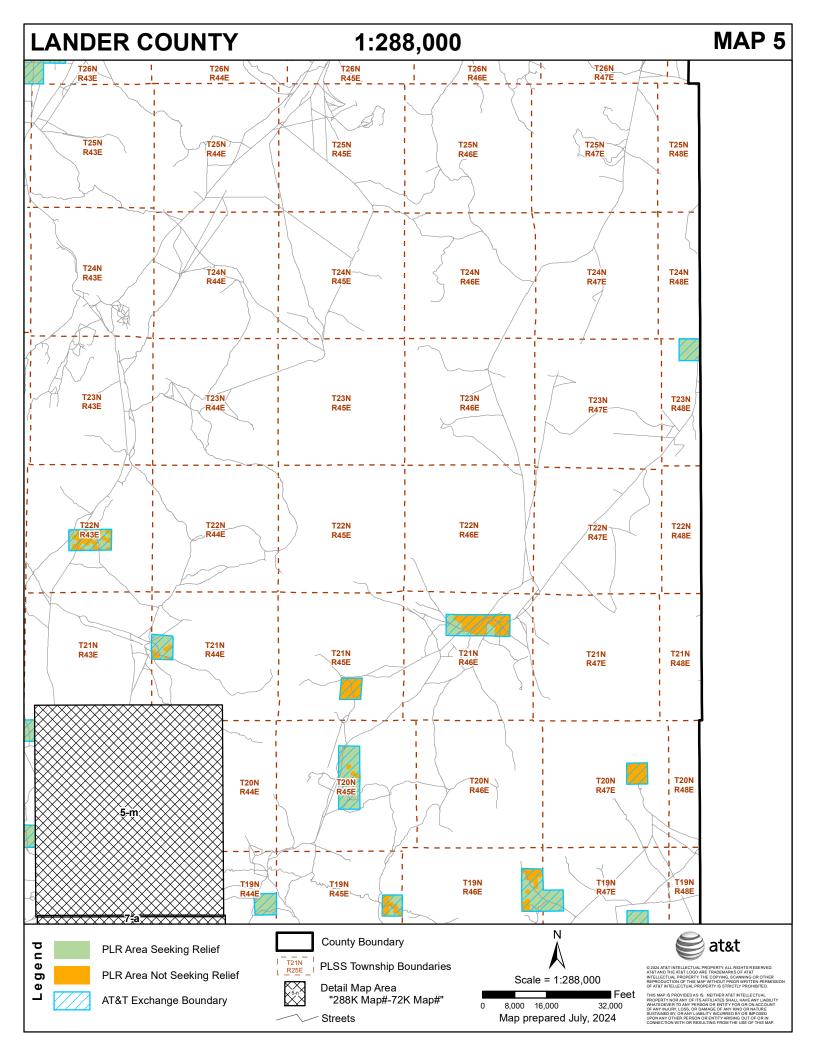


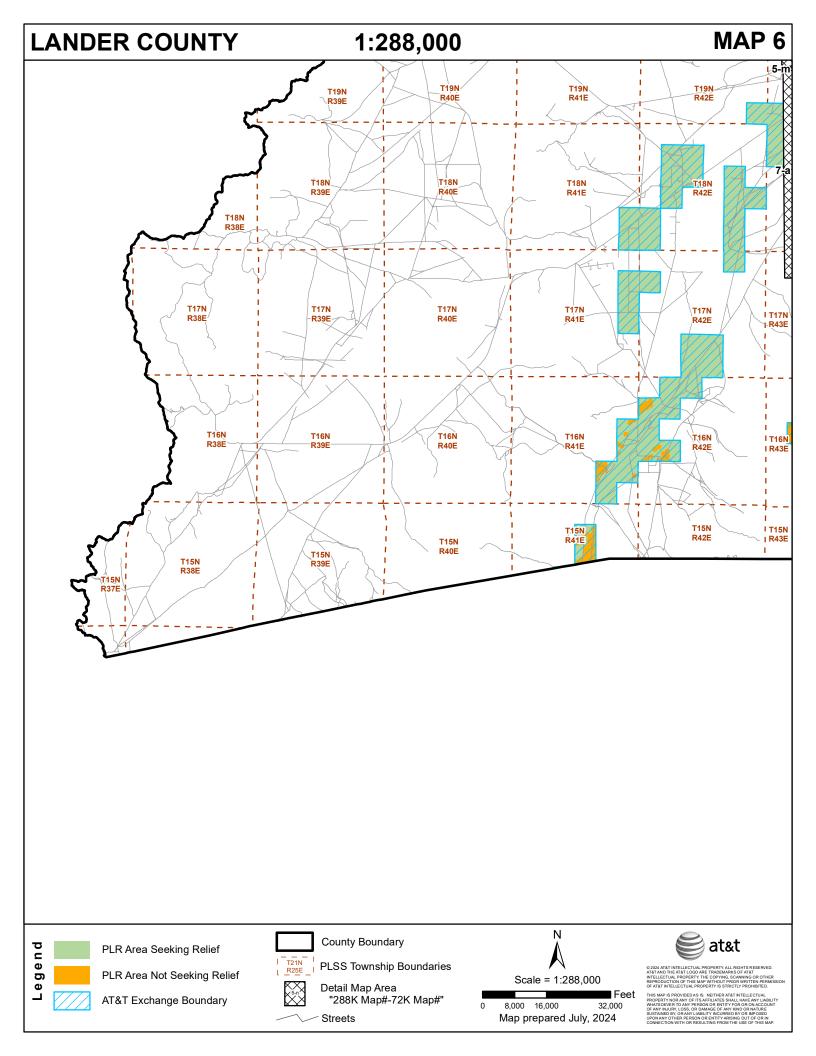
Exhibit 3 Street level maps of POLR Areas Scale of 1:288,000

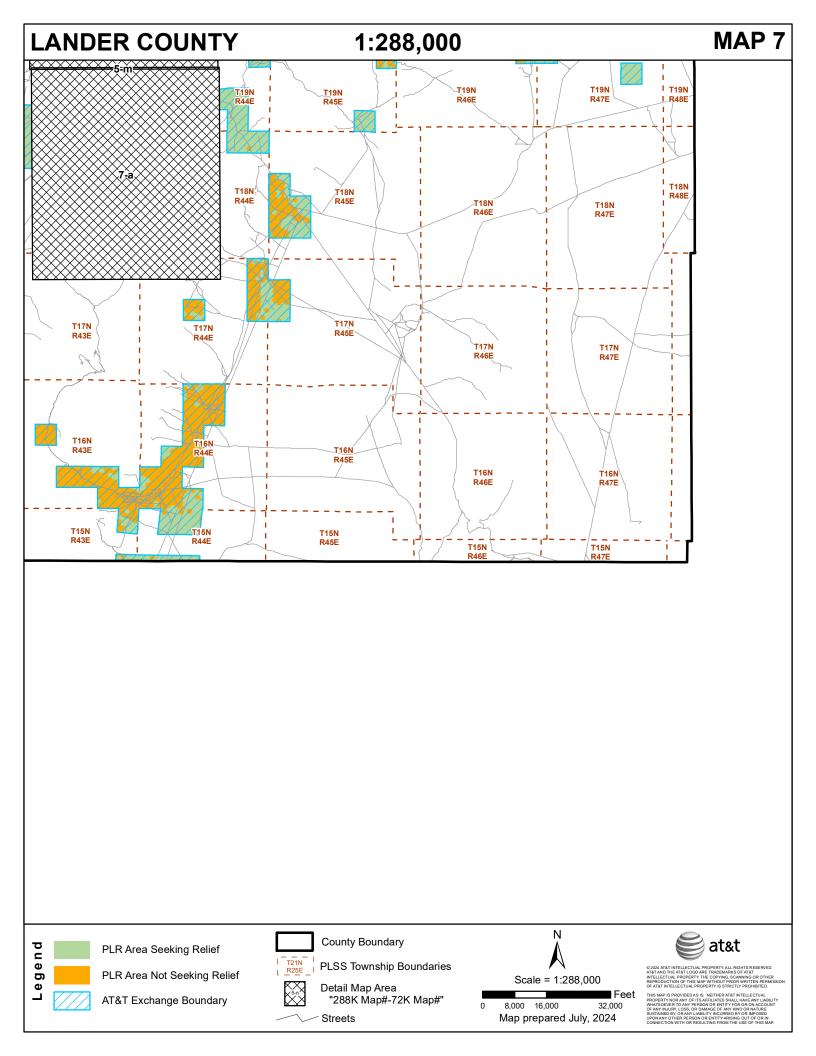


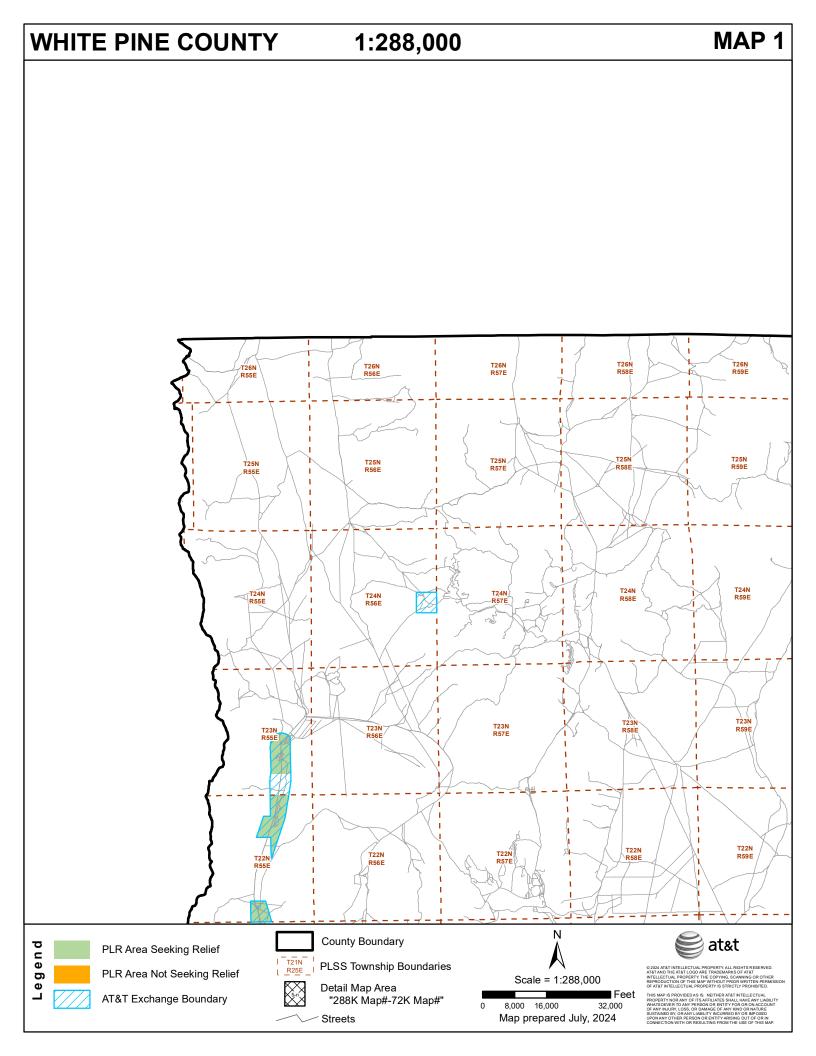


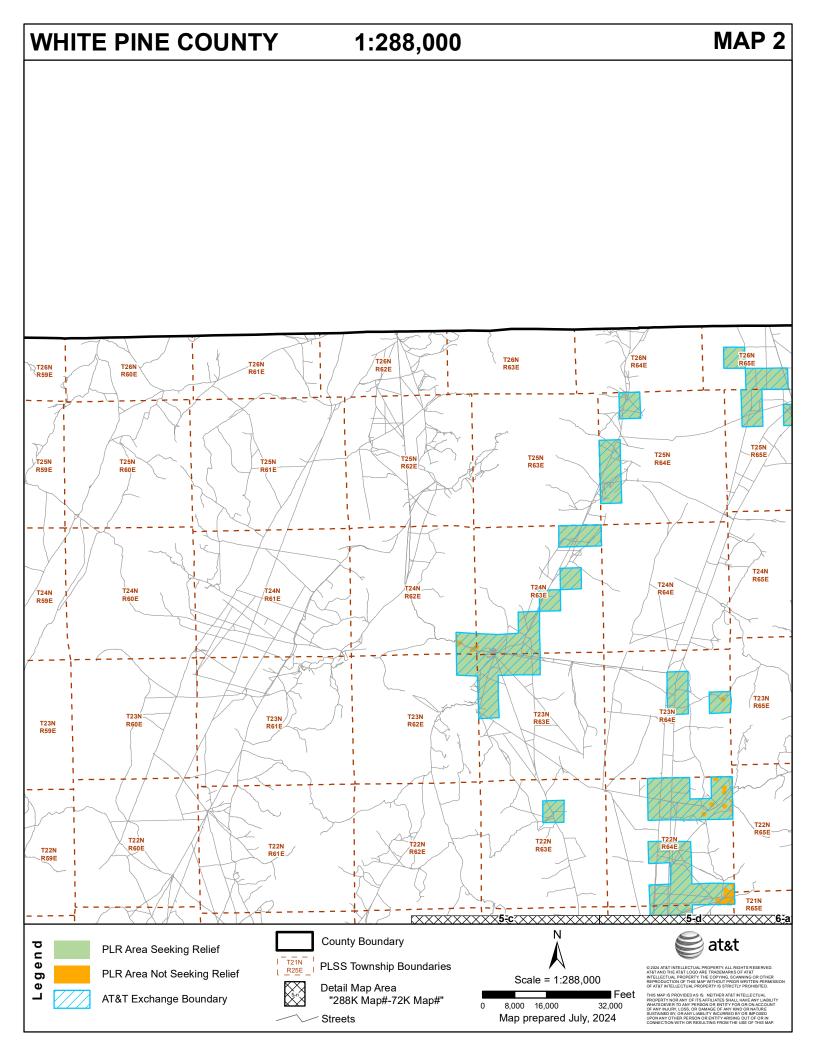


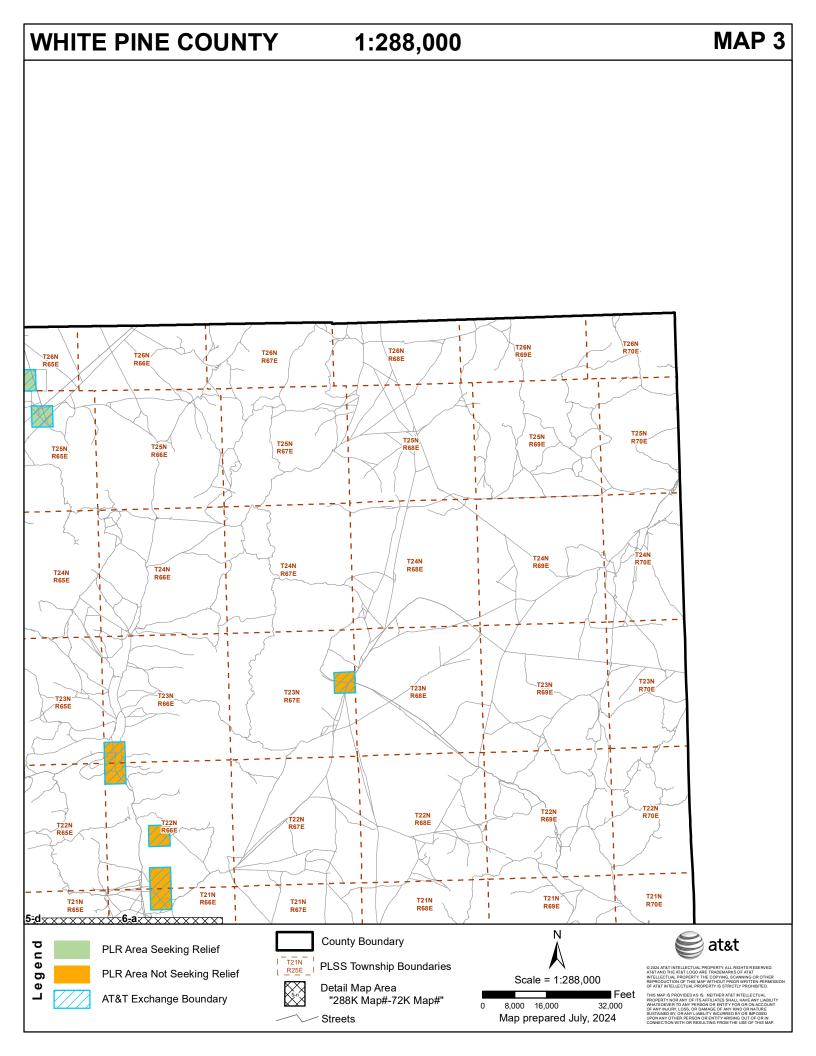


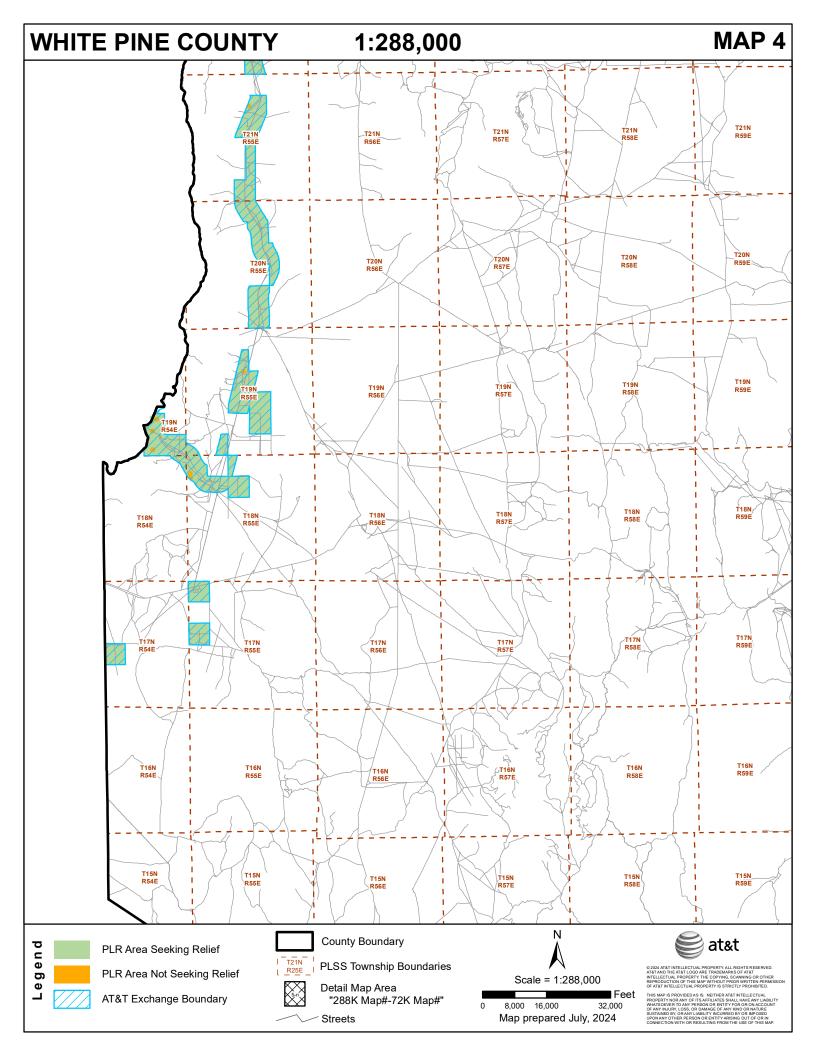


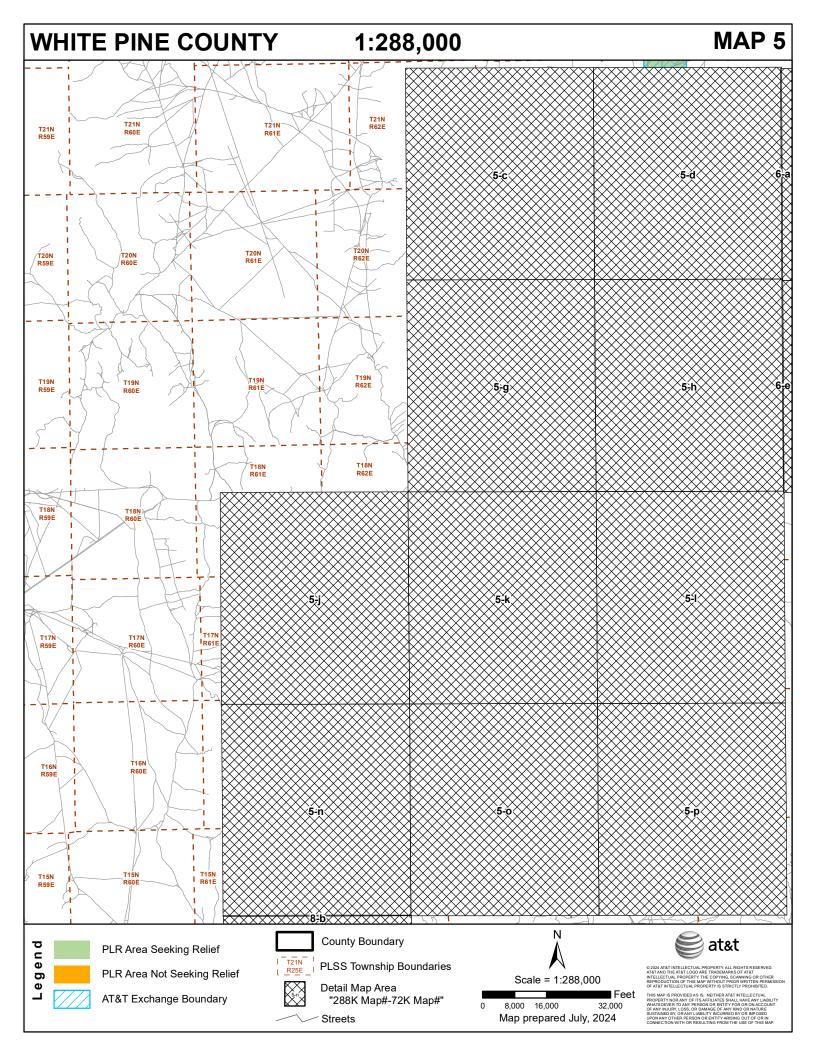


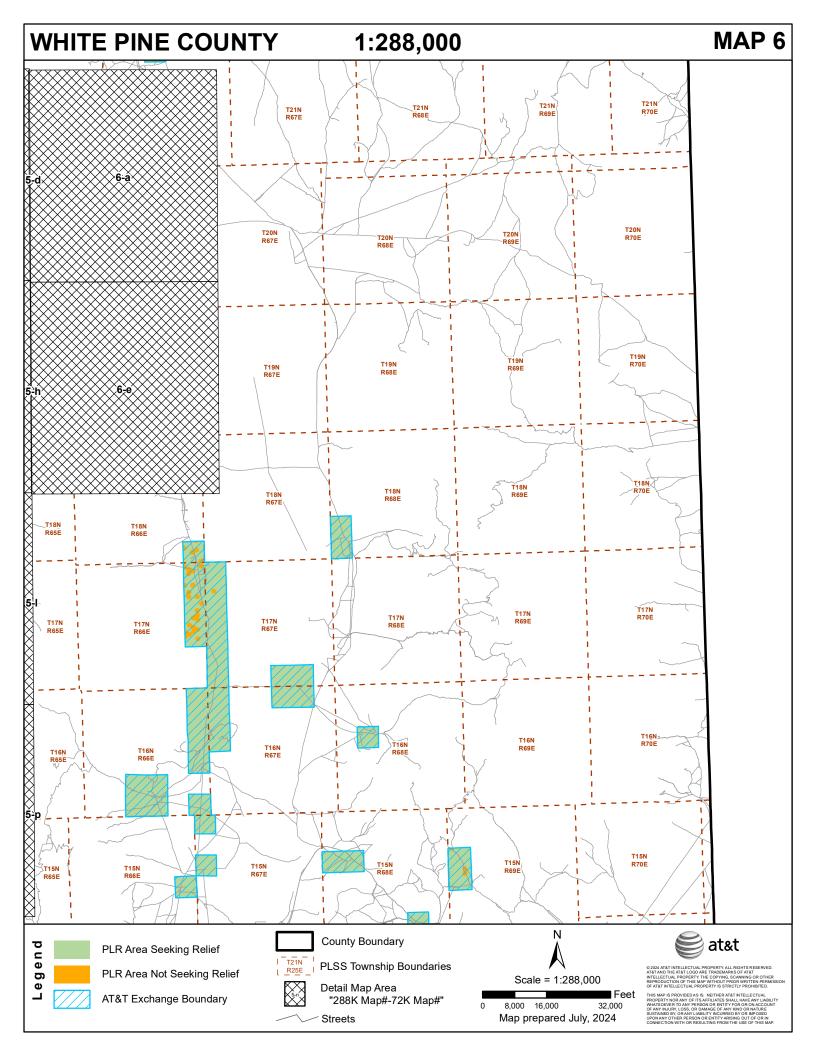


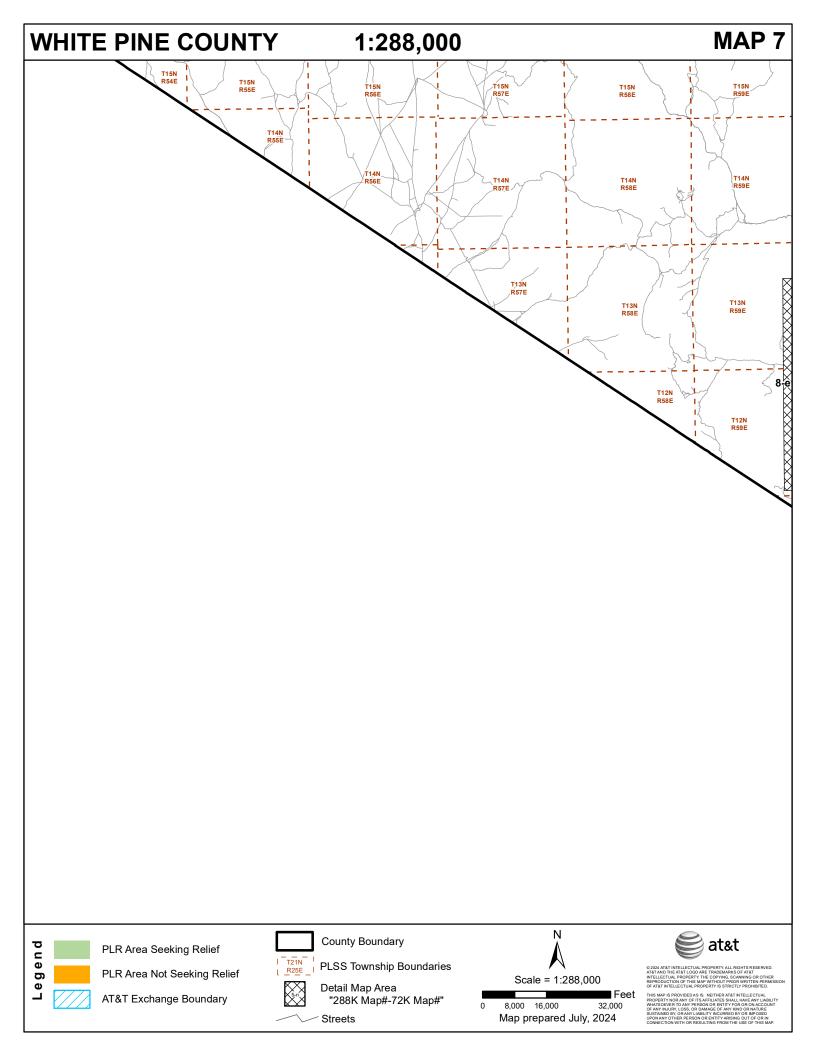


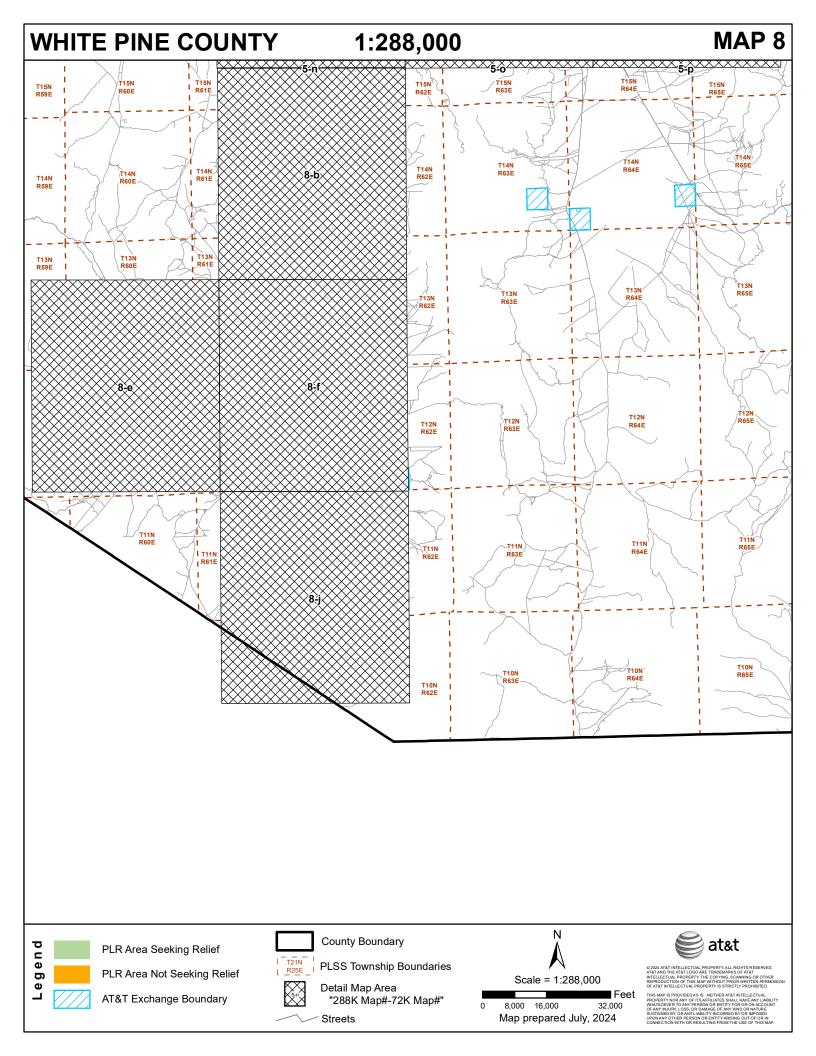












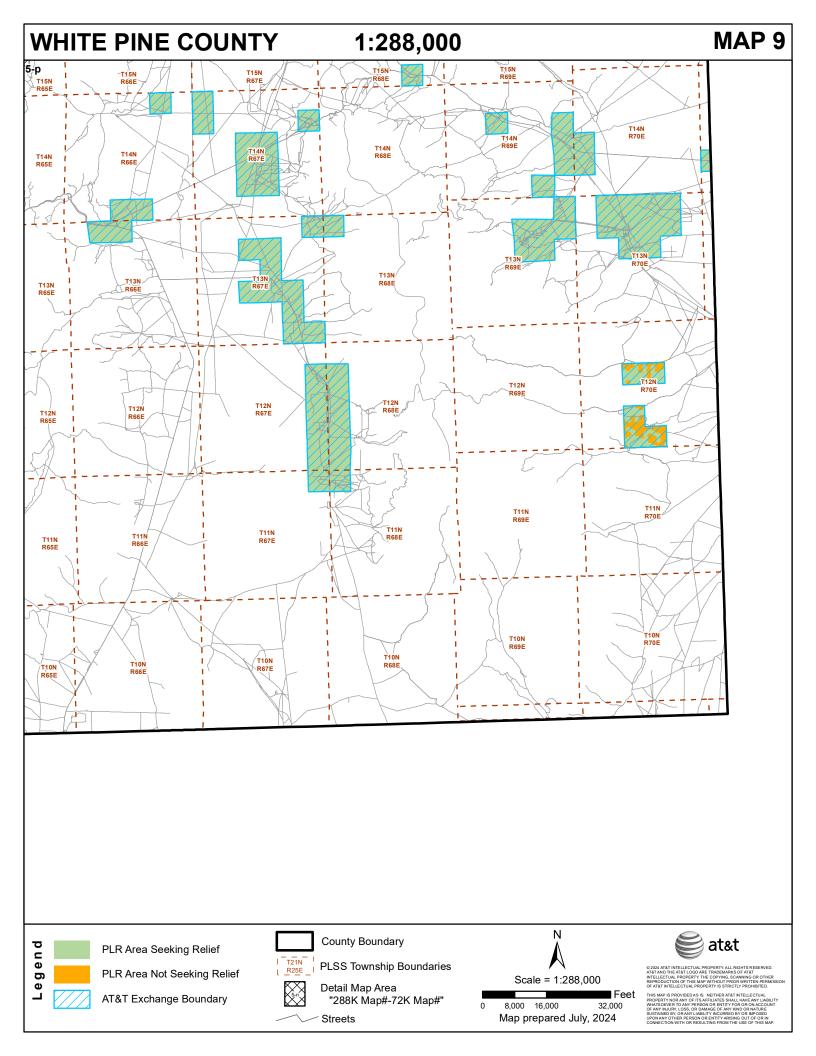
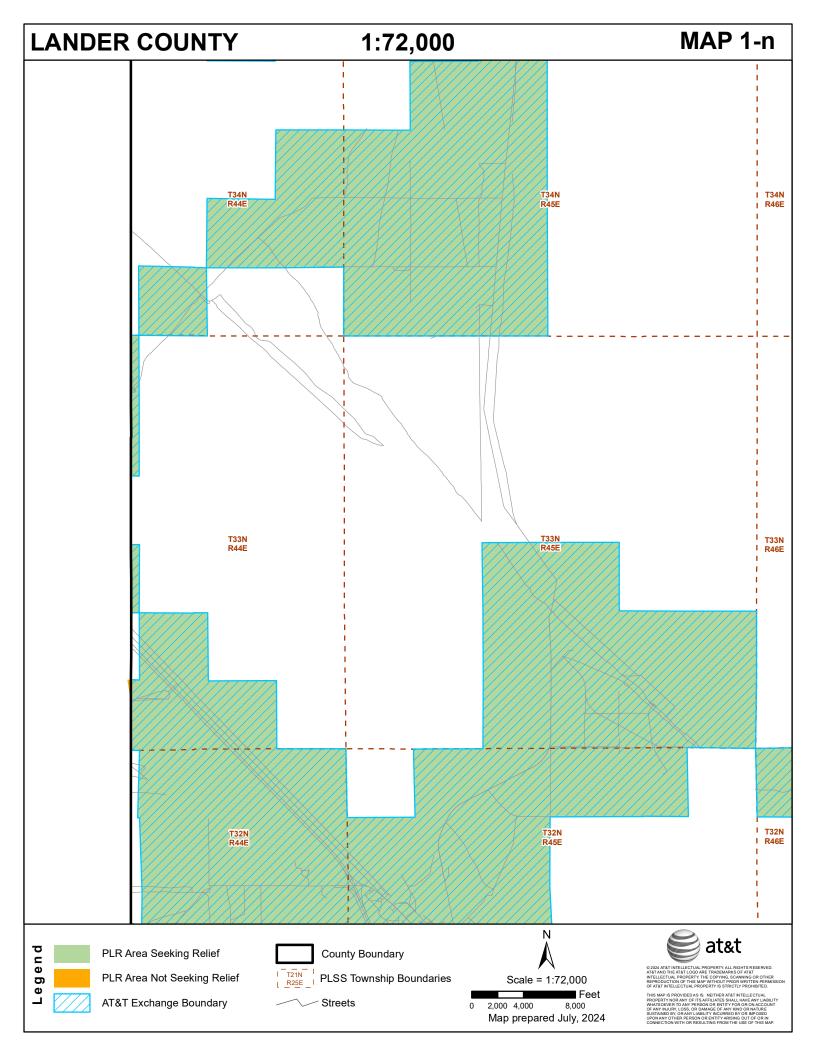
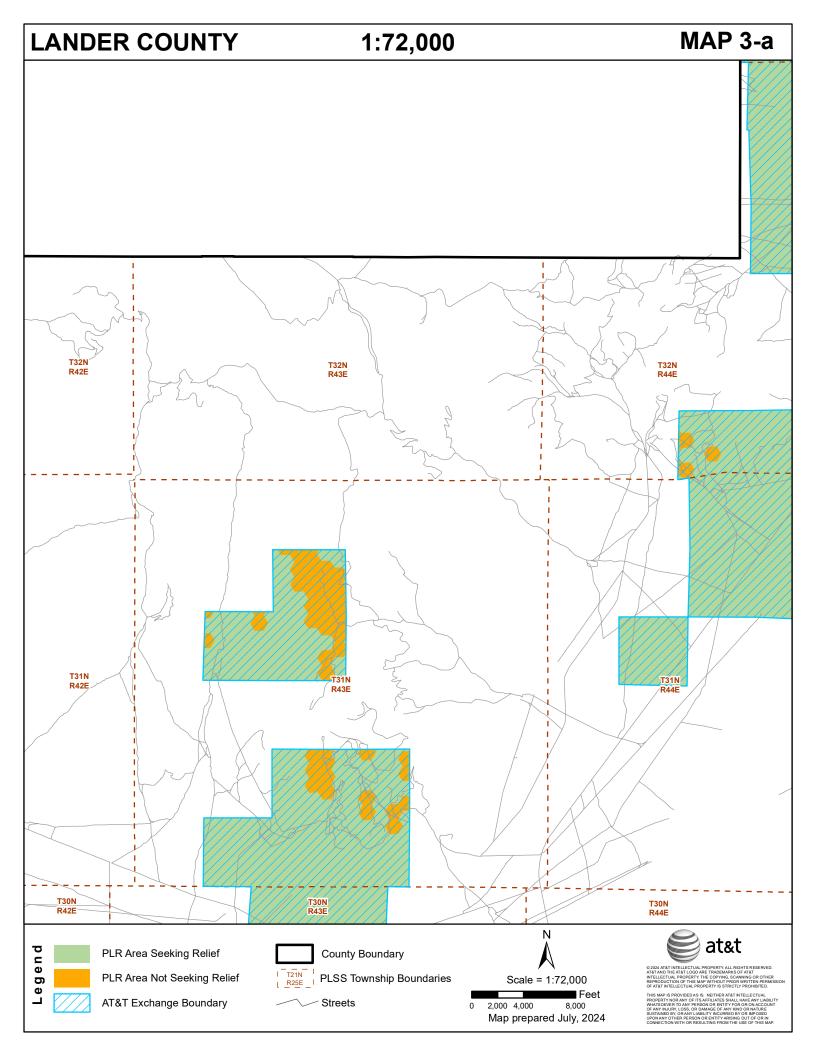
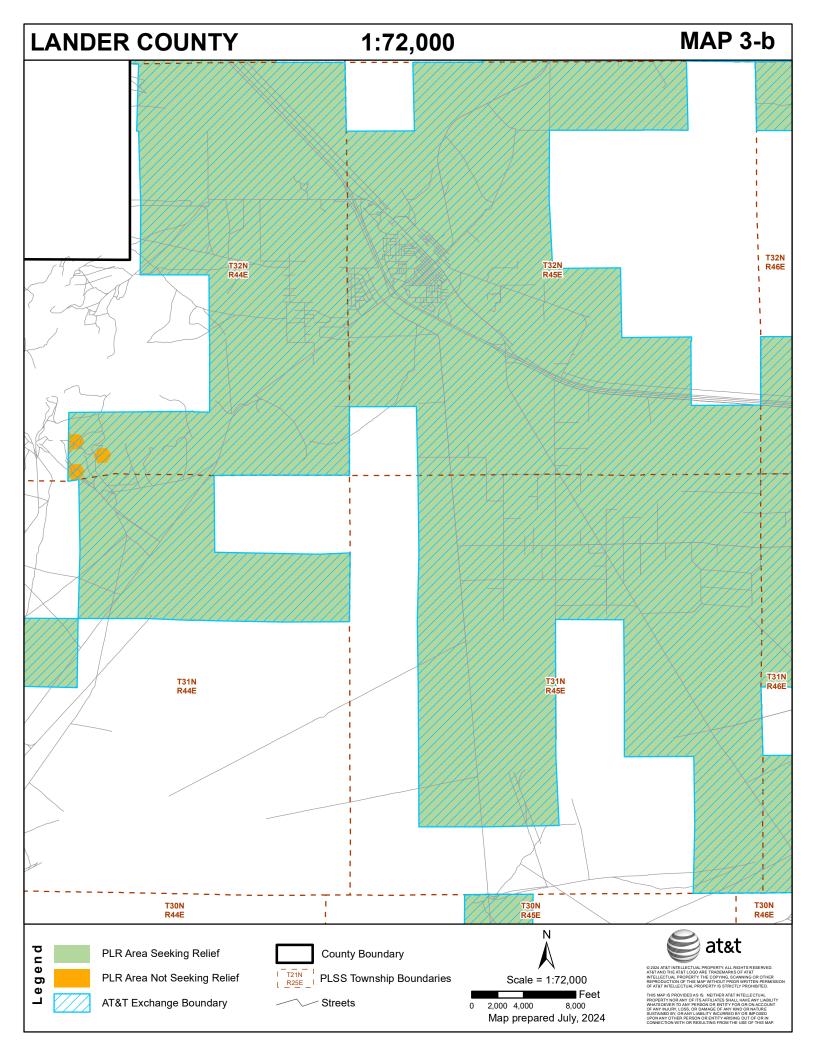
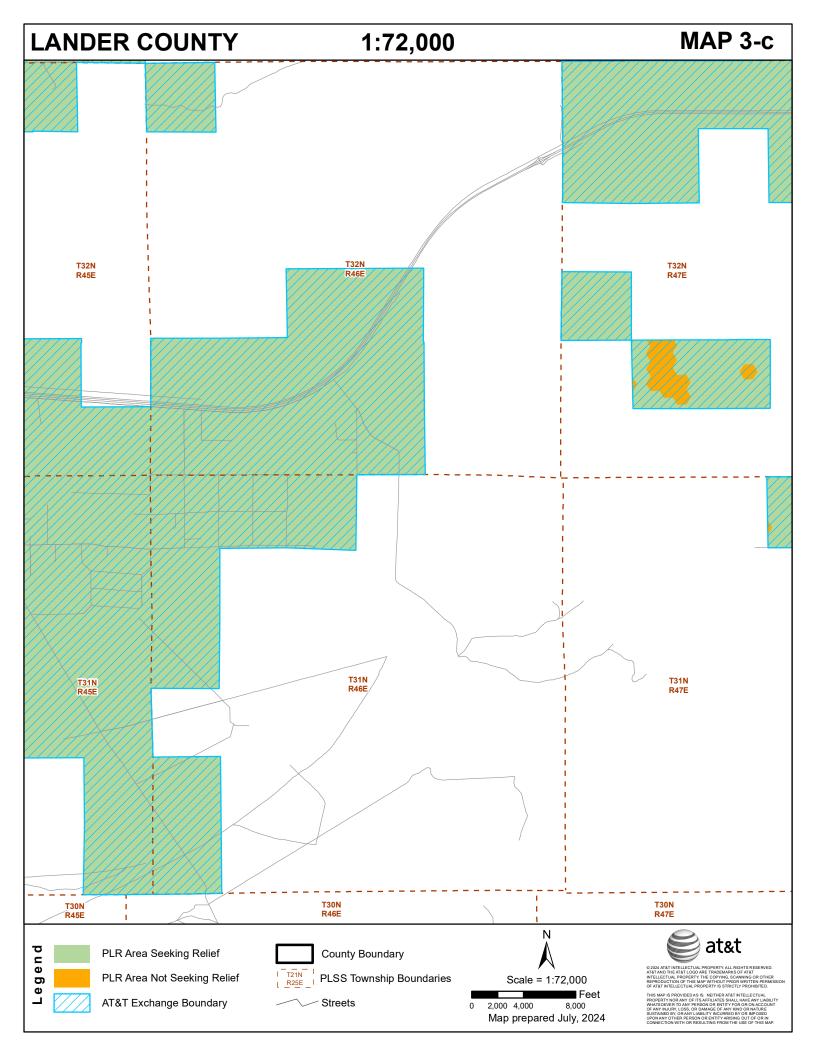


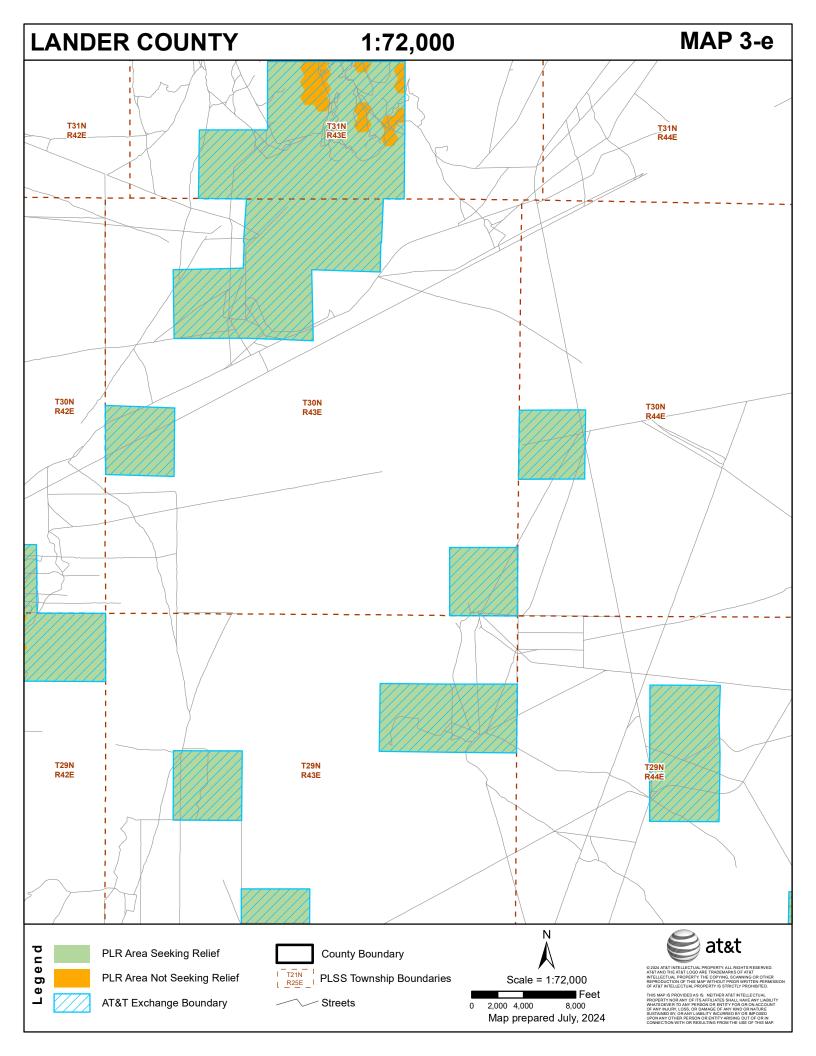
Exhibit 4 Street level maps of POLR Areas Scale of 1:72,000

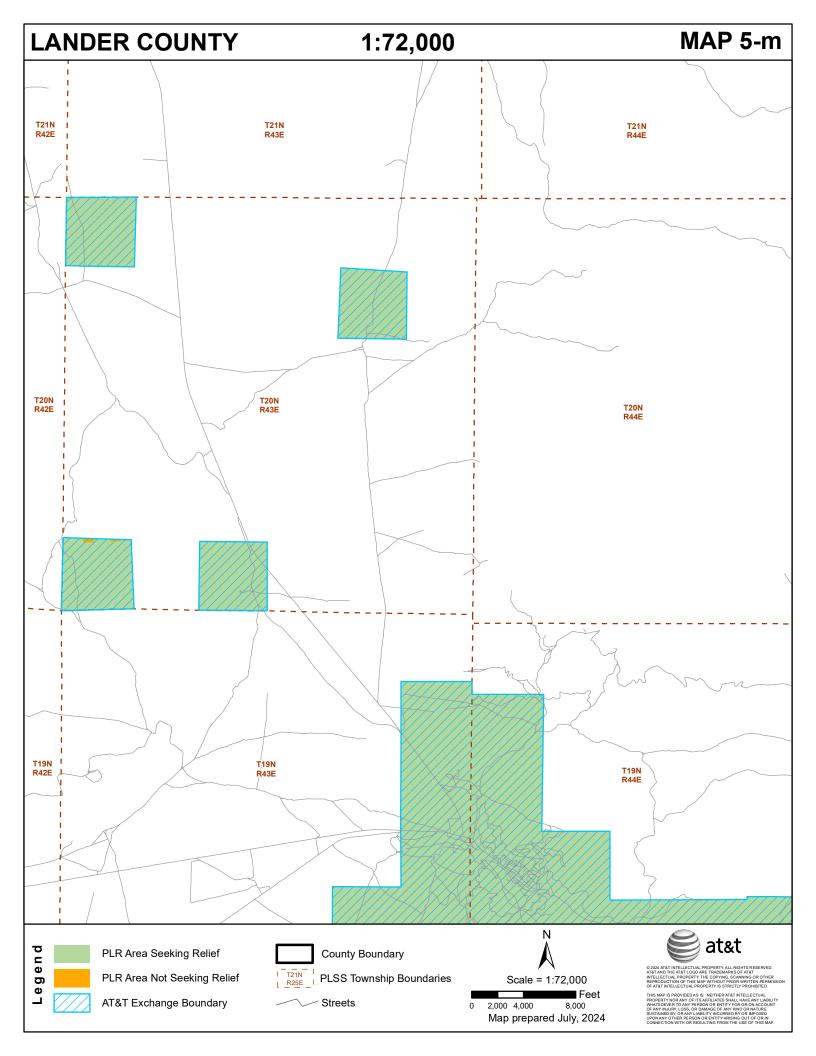


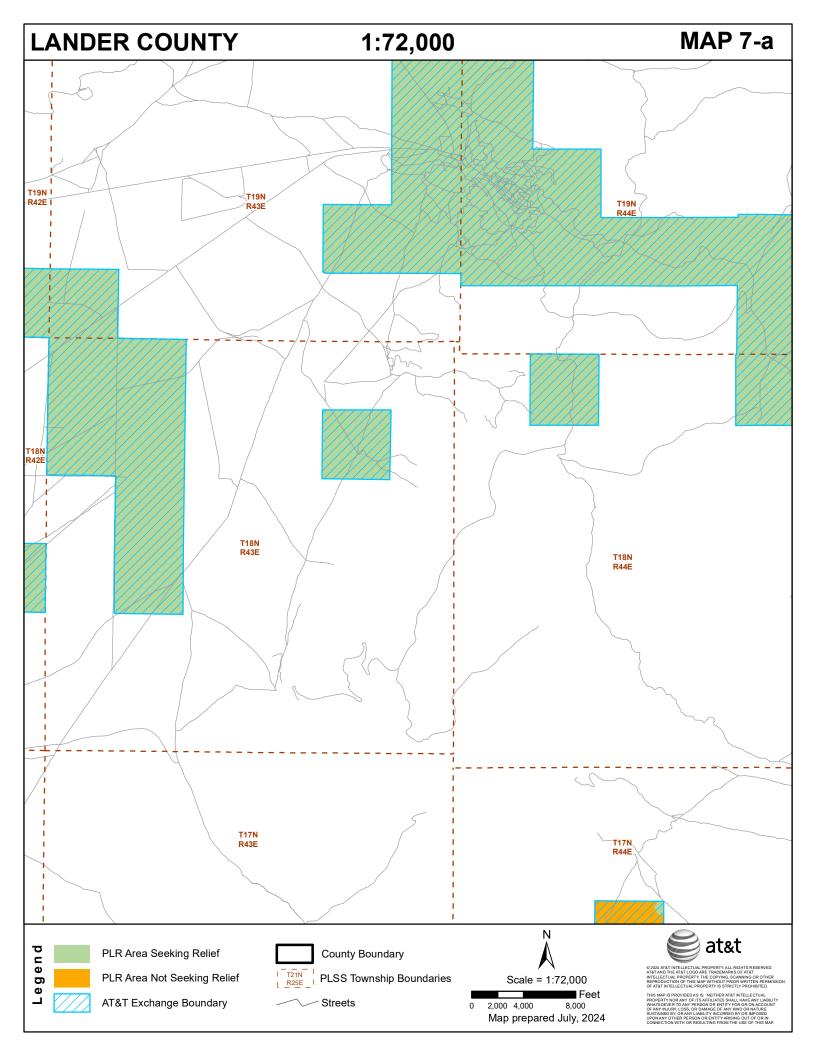


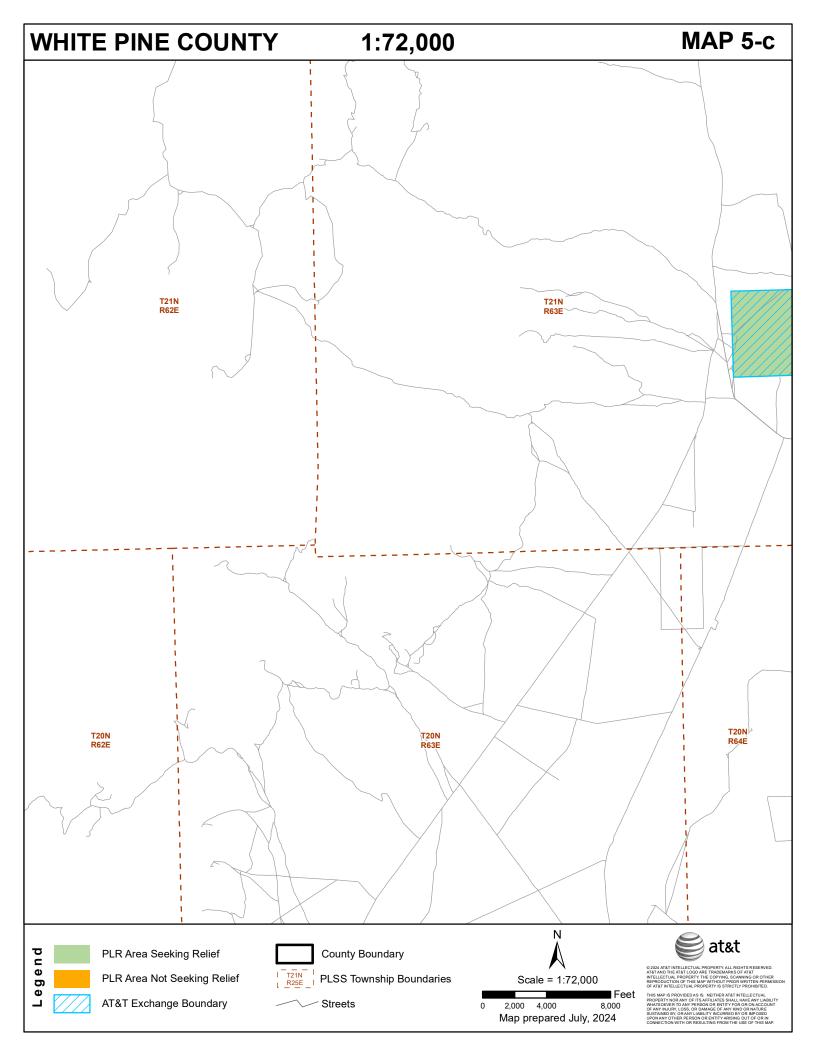


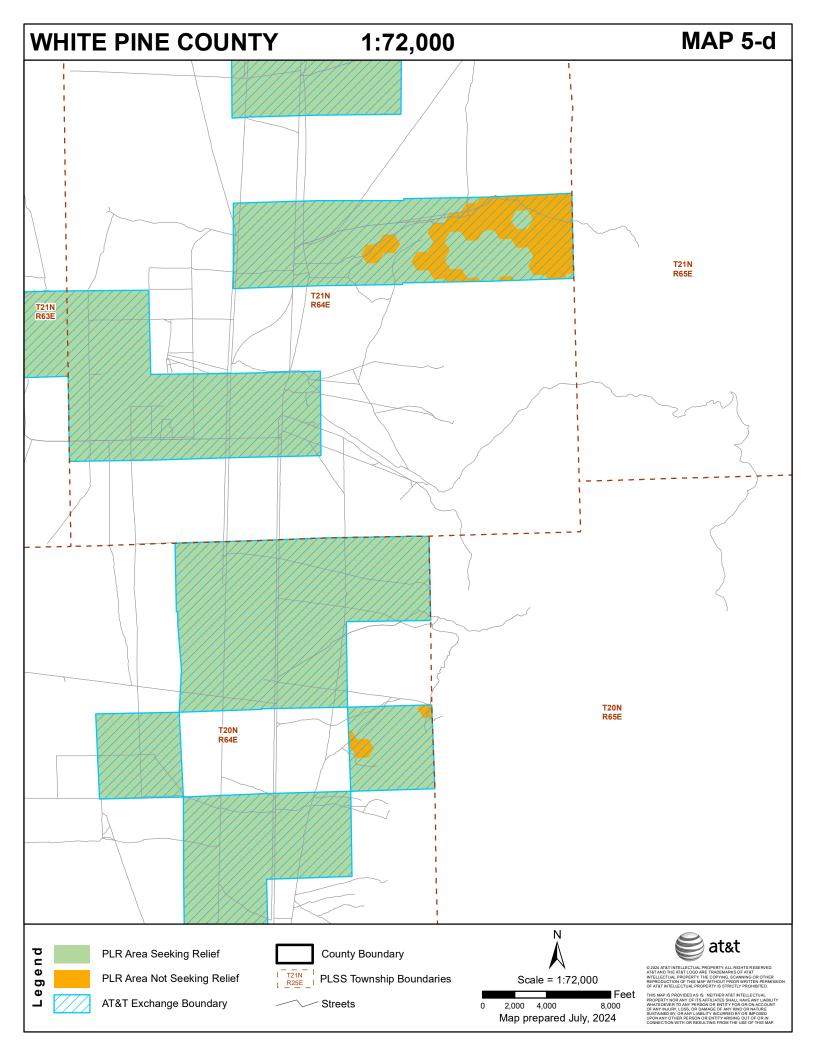


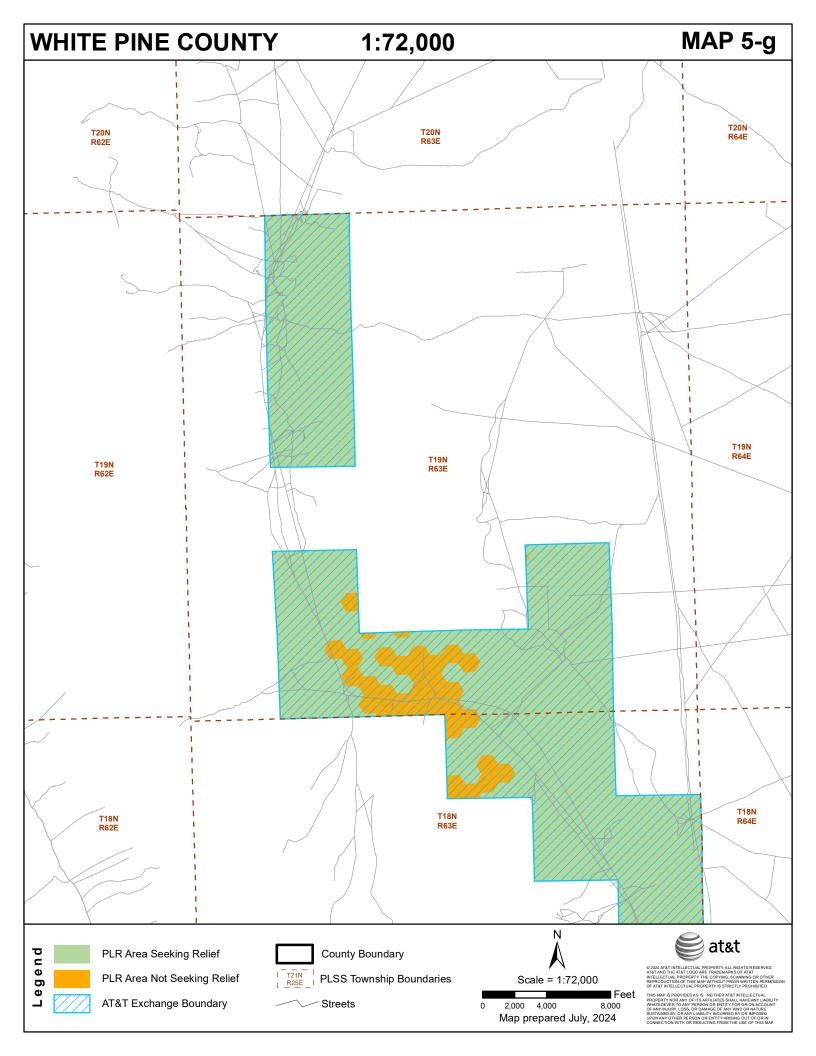


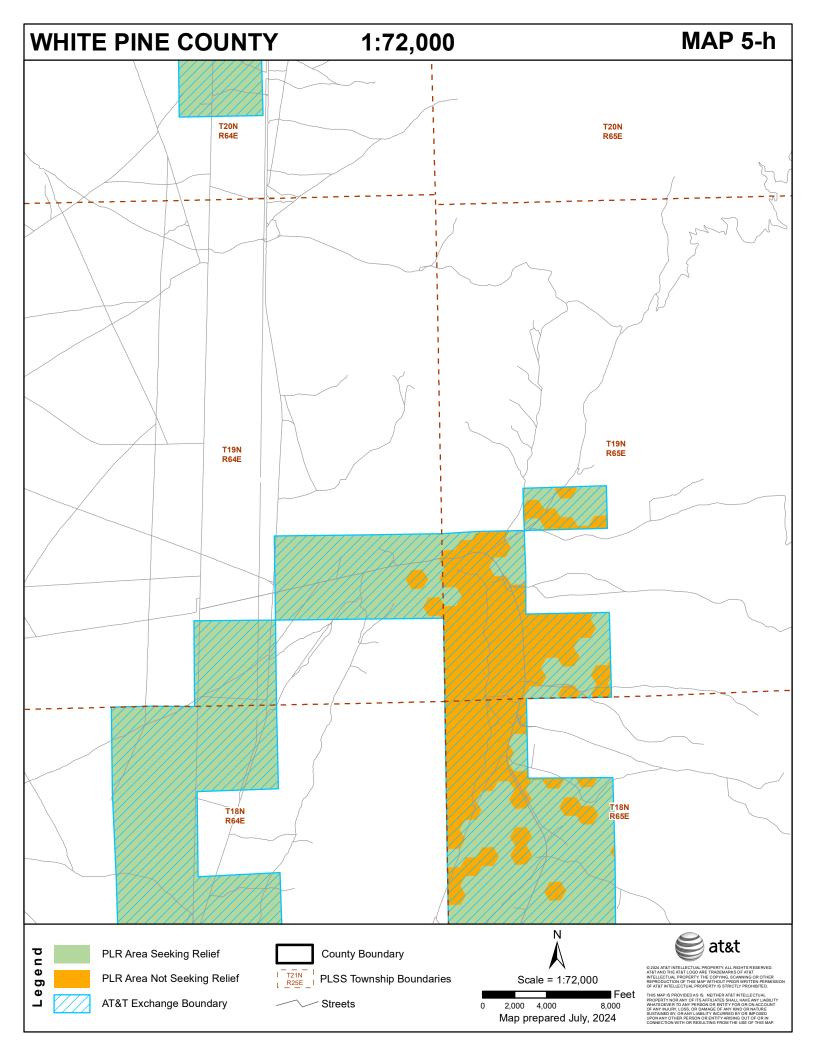


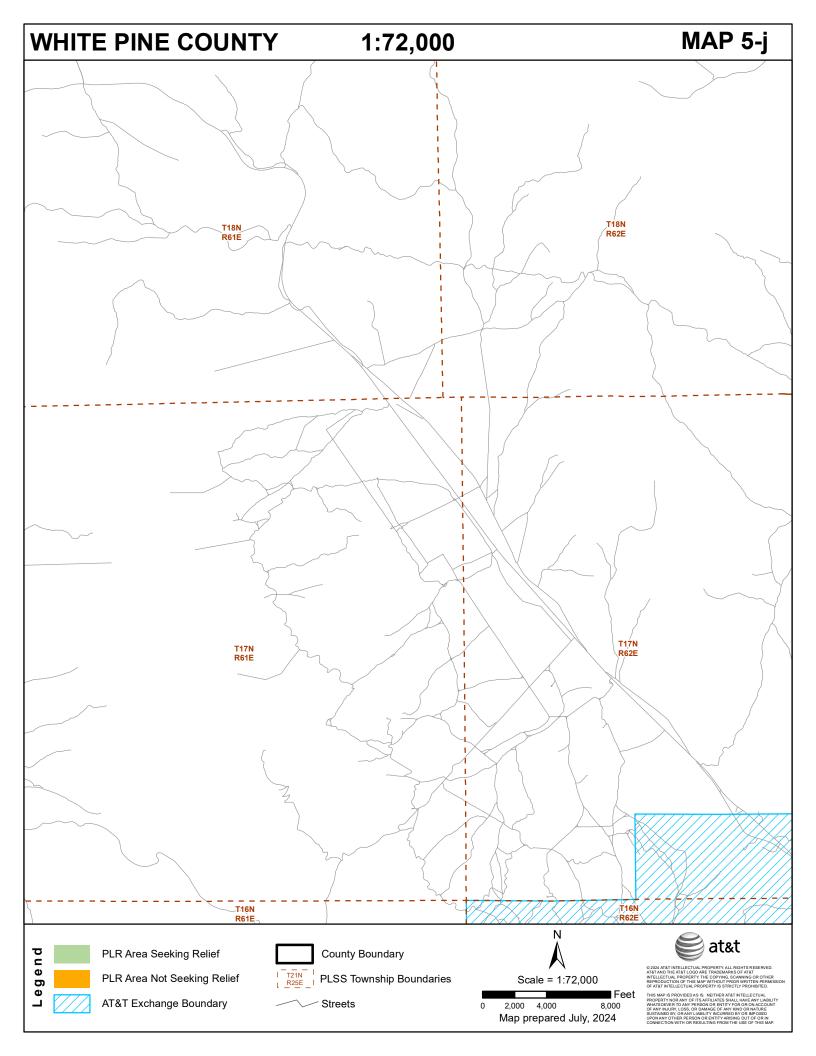


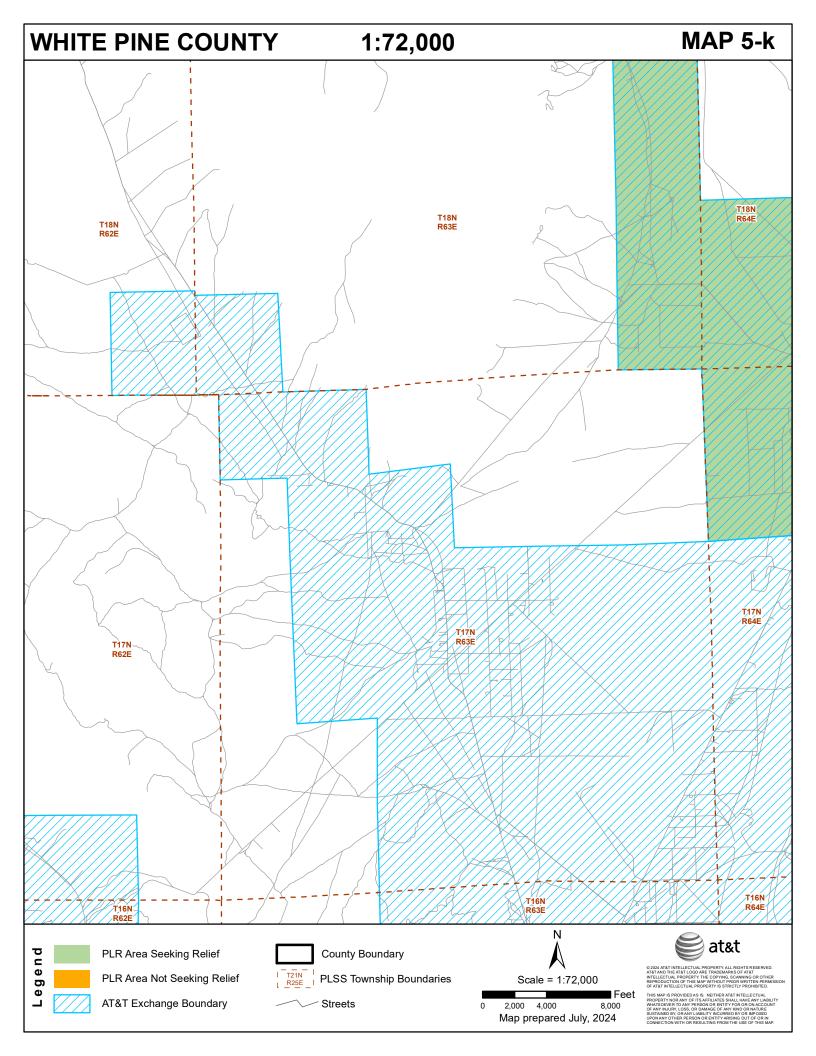


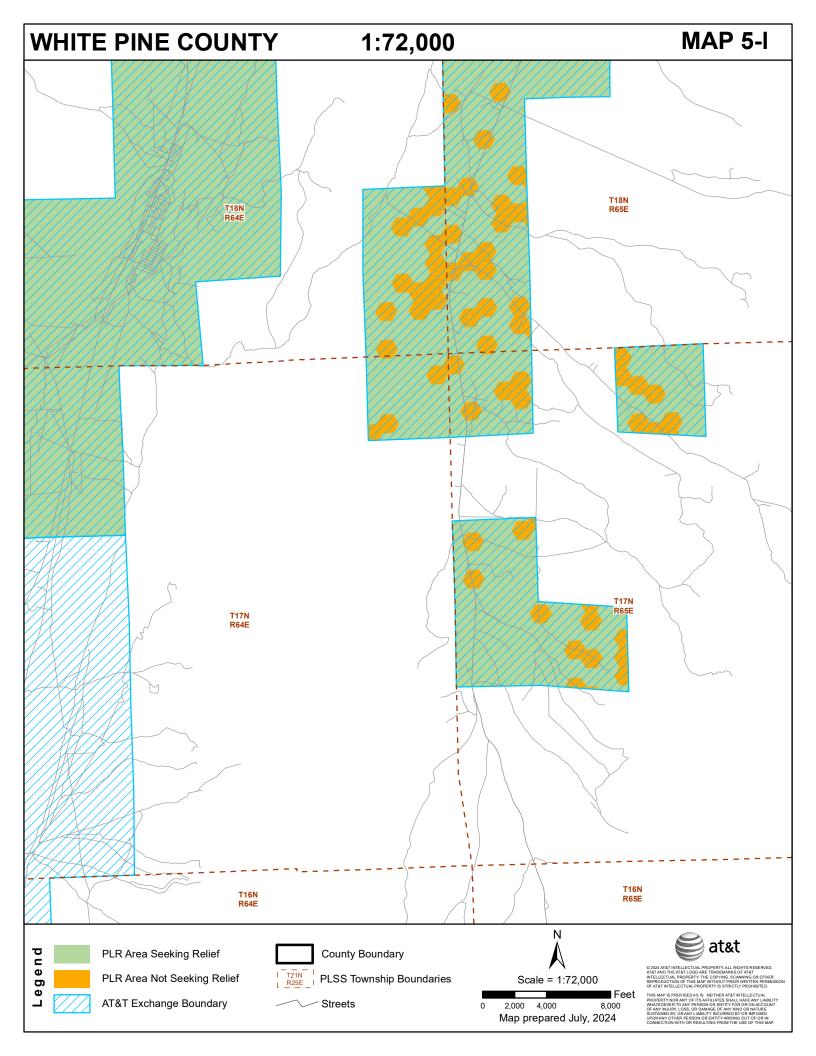


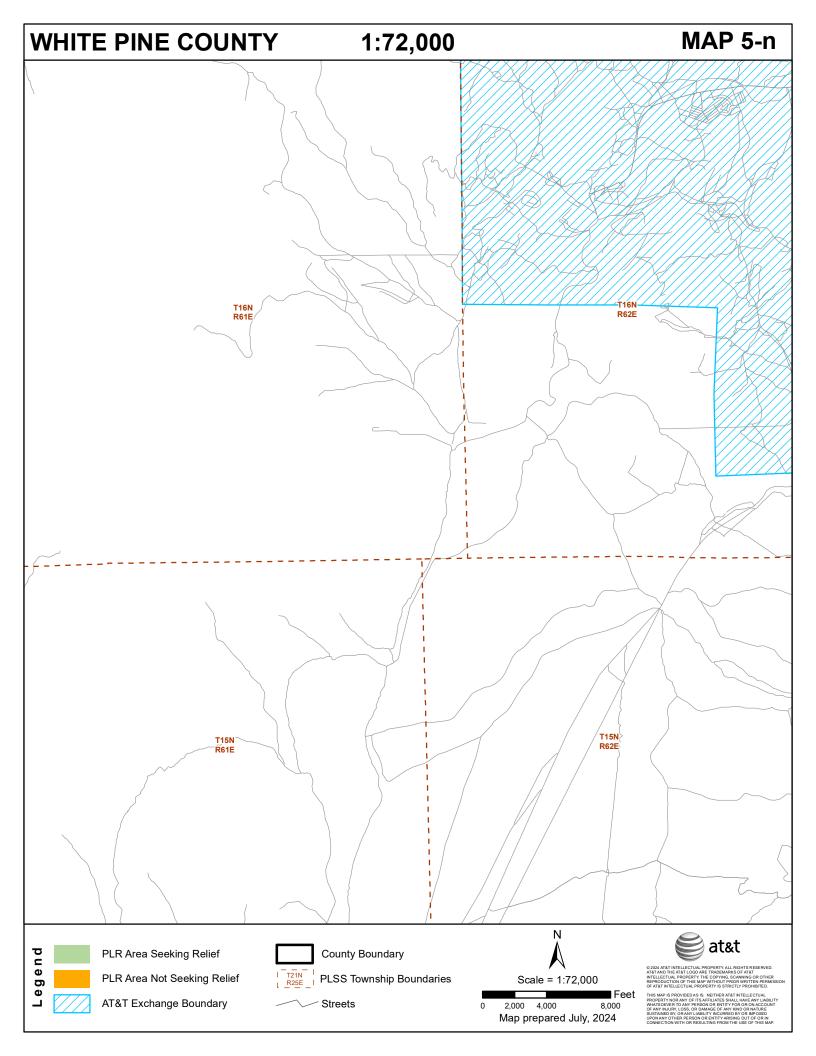


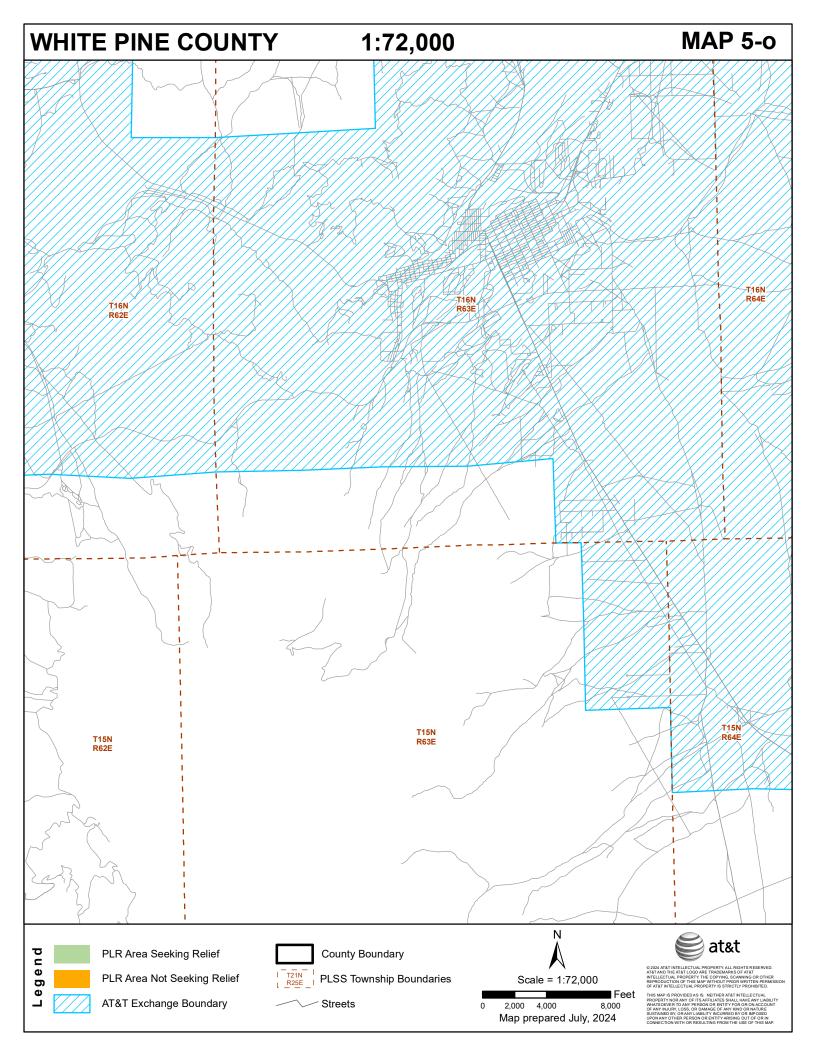


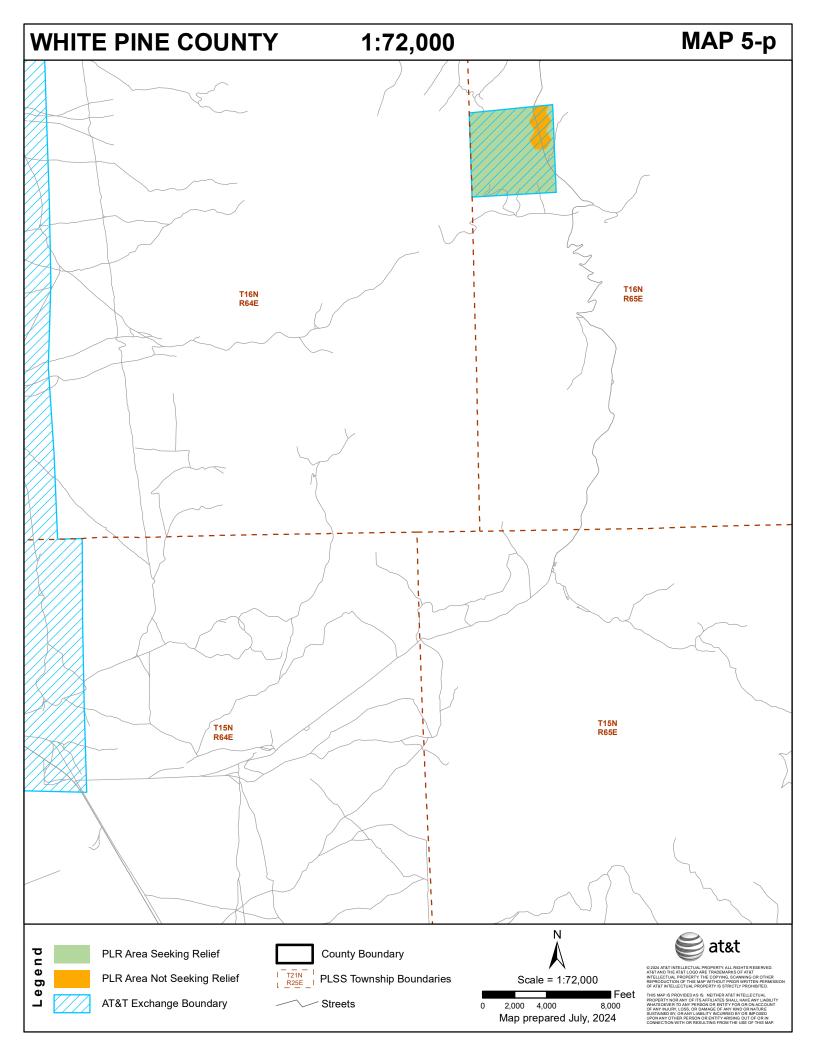




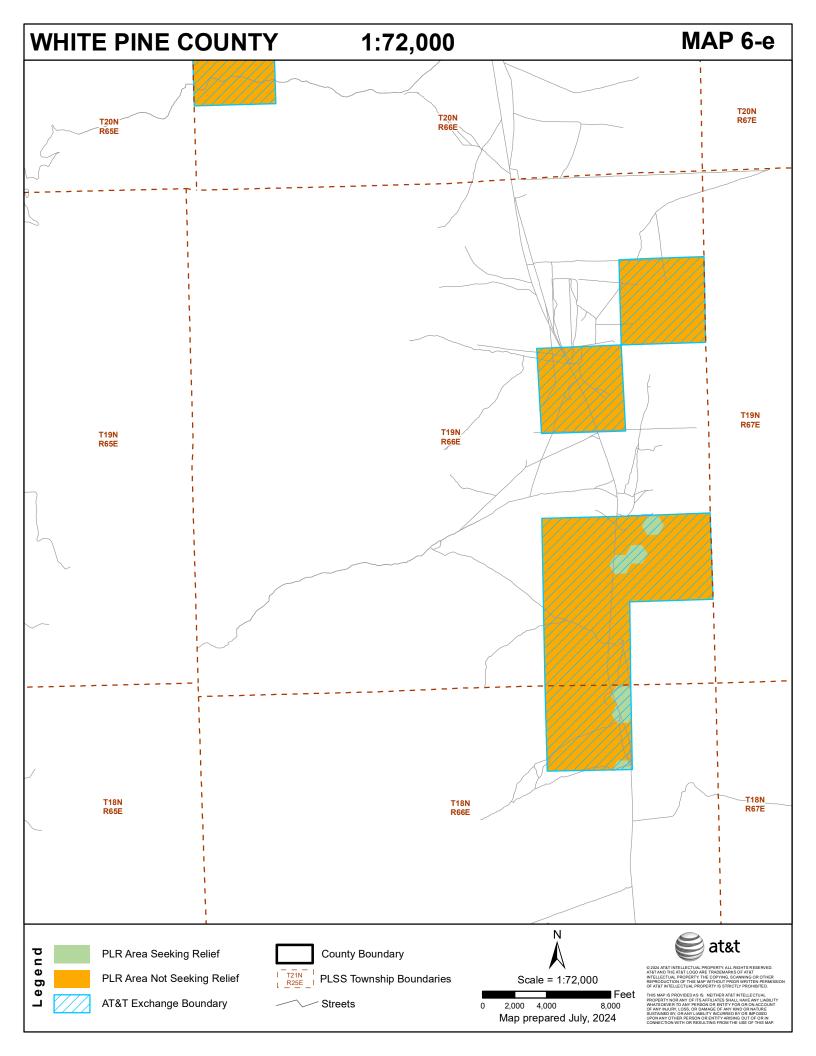


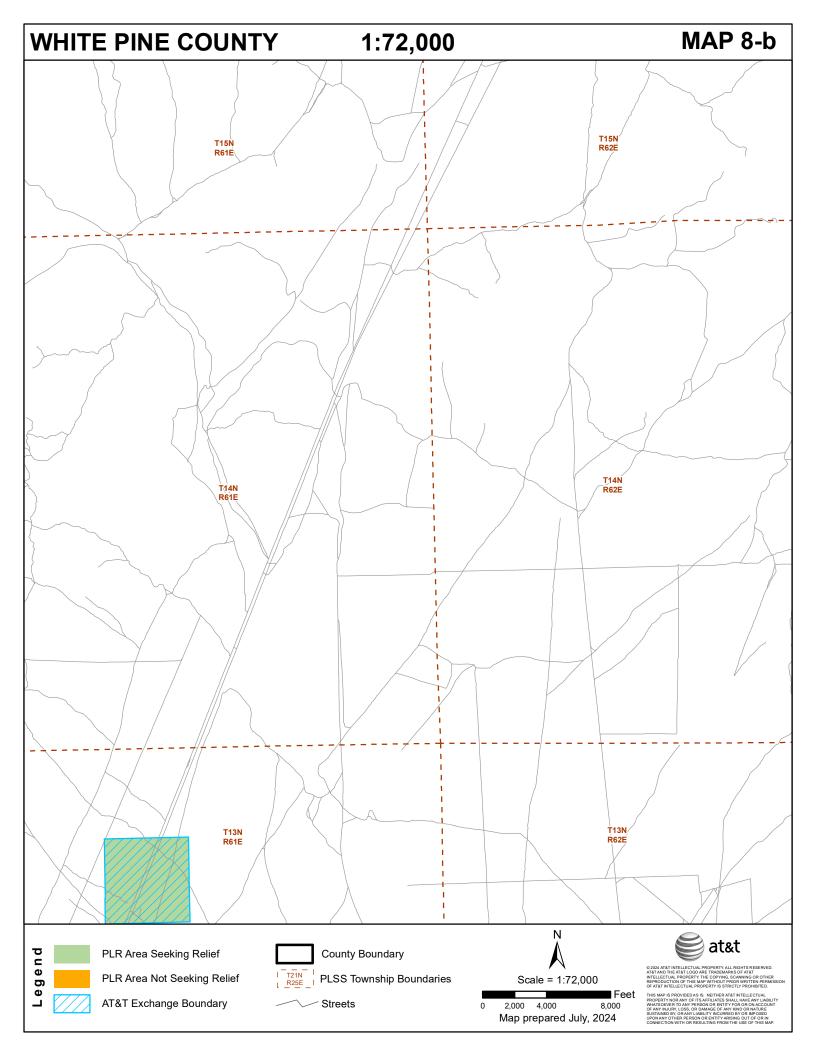


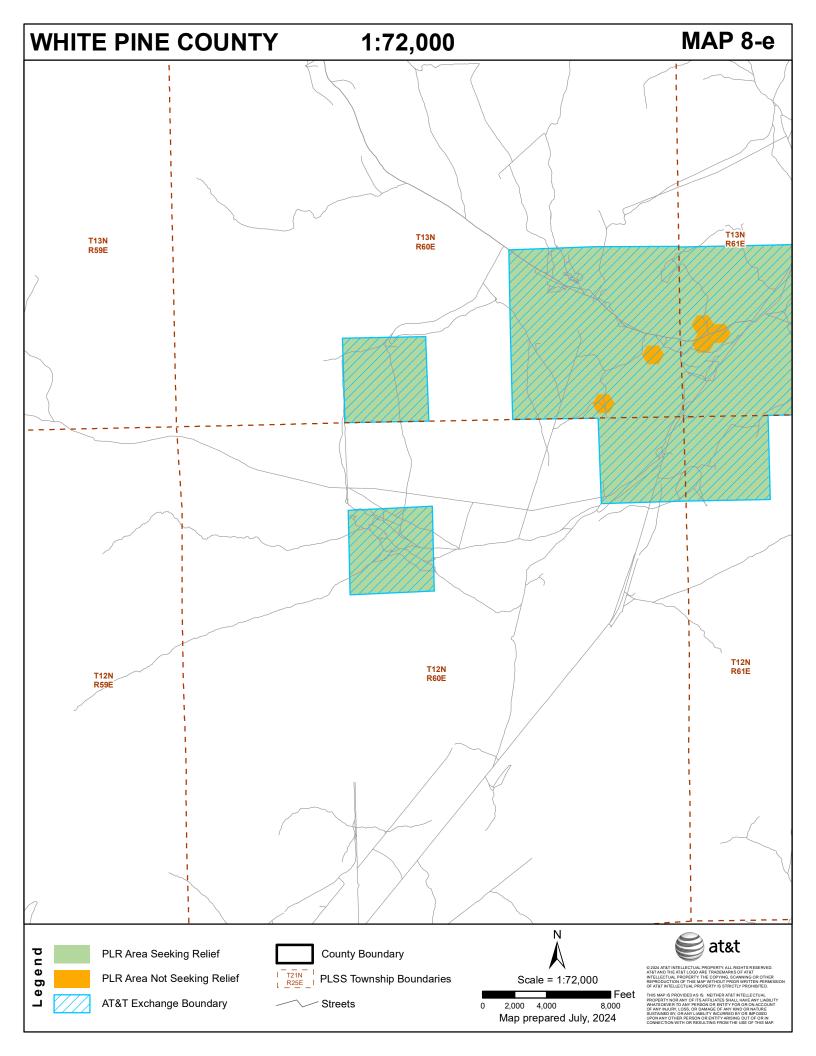


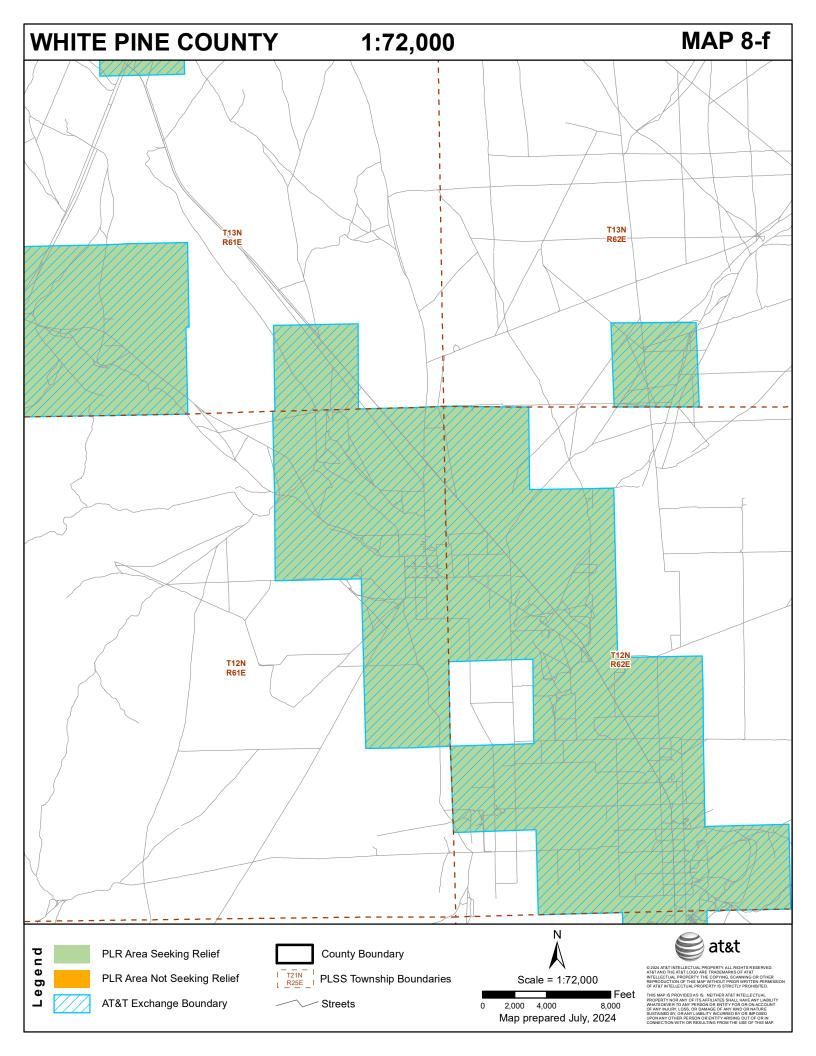












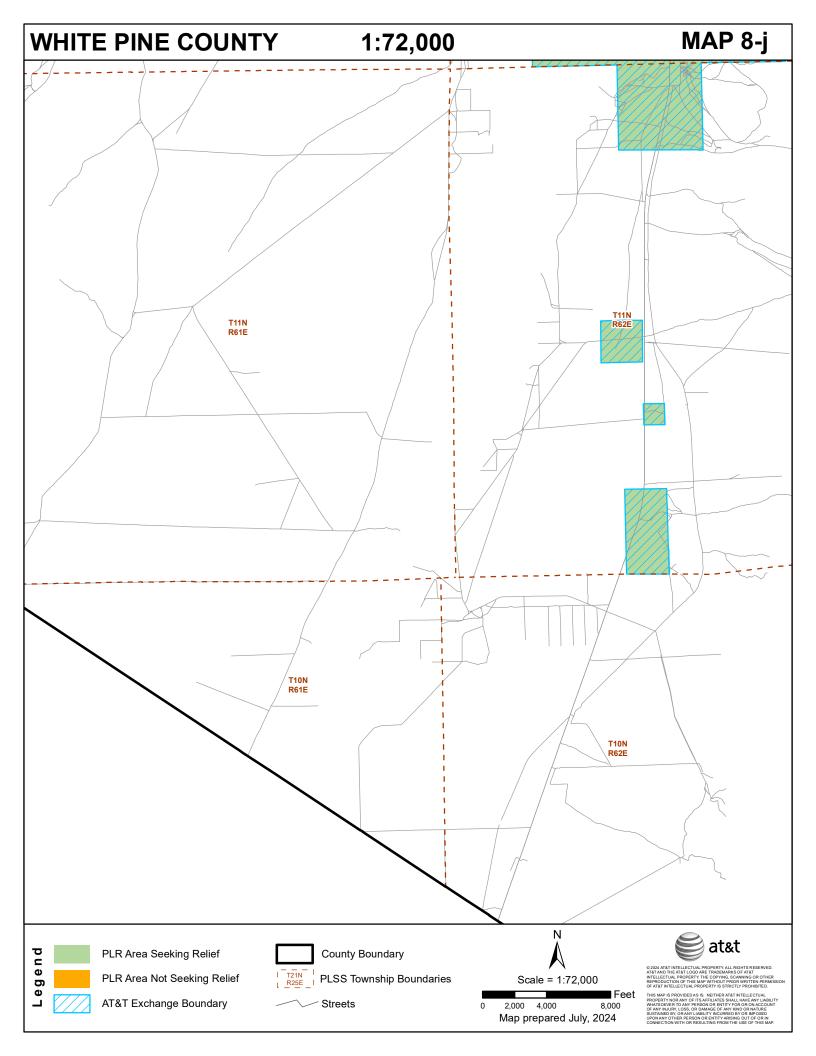
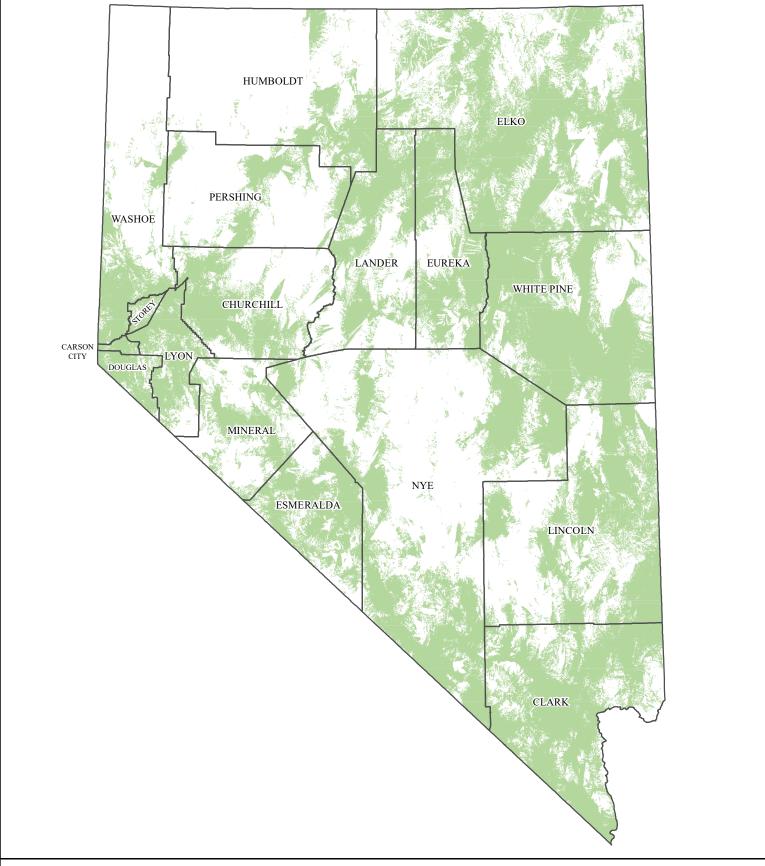


Exhibit 5

Coverage Maps of alternative voice service providers located in areas relief is requested

STATE OF NEVADA

AT&T MOBILITY COVERAGE
Resellers of AT&T Mobility's Network: Cricket Wireless LLC,
Tracfone, Consumer Cellular and Dish Wireless





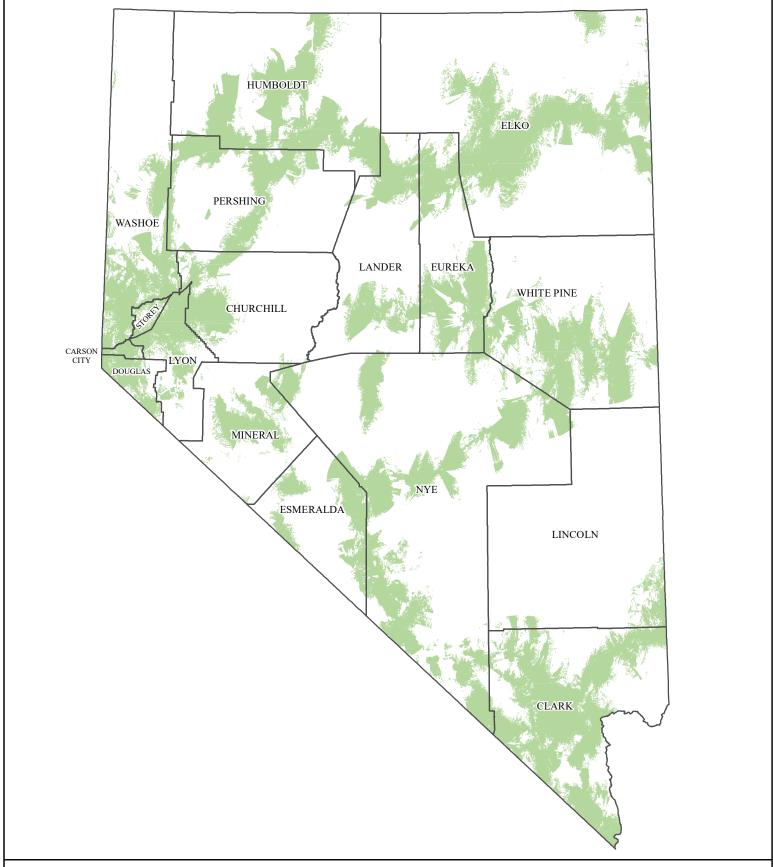
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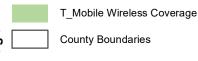


STATE OF NEVADA

T-MOBILE WIRELESS COVERAGE Resellers of T-Mobile's Network:

Tracfone, Dish Wireless and Mint Mobile







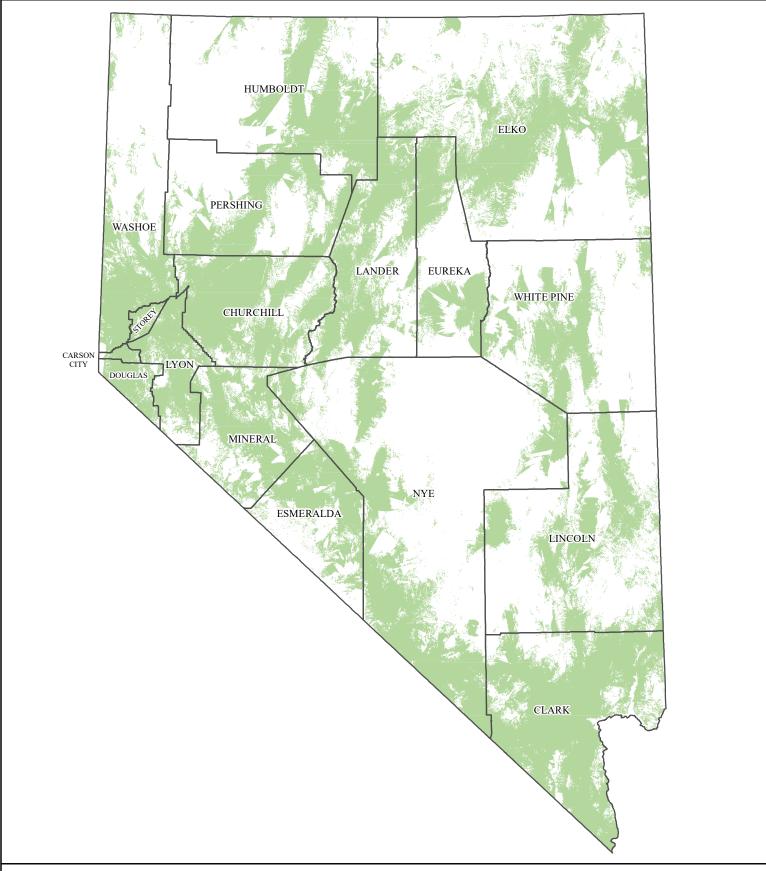
Scale = 1:3,500,000 0 10 20 Map prepared July, 2024



STATE OF NEVADA

VERIZON WIRELESS COVERAGE

Reseller of Verizon's Network: Tracfone







Scale = 1:3,500,000

Miles

10 10 20 40

Map prepared July, 2024

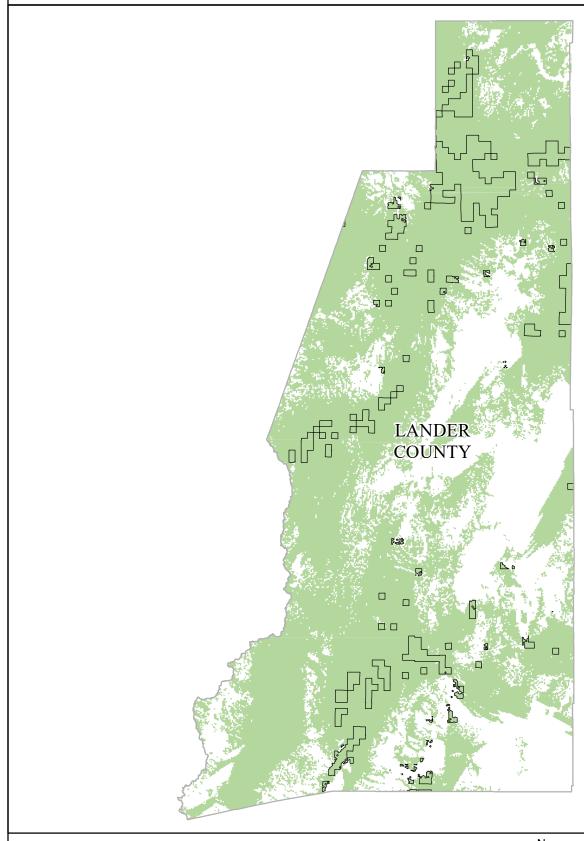
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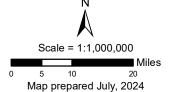
LANDER COUNTY

AT&T MOBILITY, T-MOBILE AND VERIZON COMBINED COVERAGE





PLR Area Seeking Relief
Areas Covered By At Least One Facilities Based Wireless Provider
And One Reseller
County Boundaries



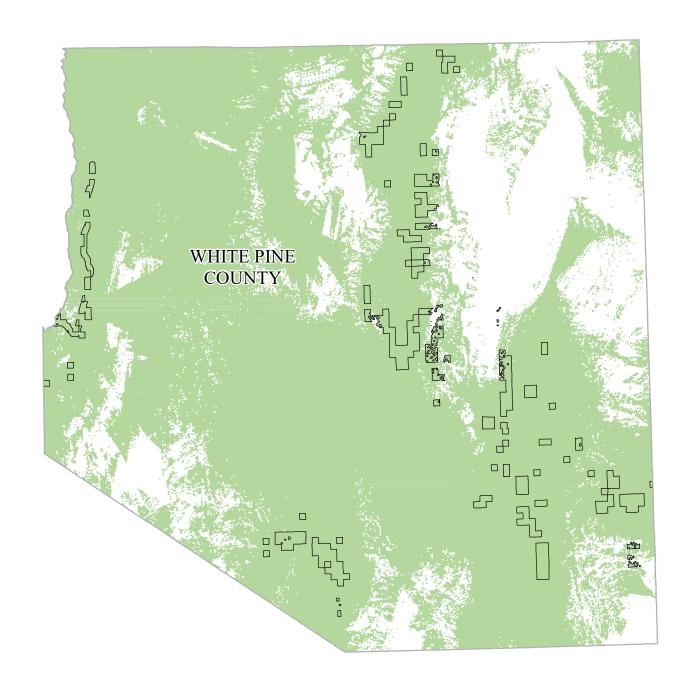


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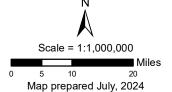
WHITE PINE COUNTY

AT&T MOBILITY, T-MOBILE AND VERIZON COMBINED COVERAGE





PLR Area Seeking Relief
Areas Covered By At Least One Facilities Based Wireless Provider
And One Reseller
County Boundaries





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Exhibit 6 Declaration of Ty Shalley

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of Nevada Bell Telephone Company LLC d/b/a AT&T Nevada and)	Docket No. 24-
AT&T Wholesale for a Change in its)	(Filed July 31, 2024)
Provider of Last Resort Service Area)	• • • •
Pursuant to NRS 704.68886.)	
)	

DECLARATION OF TY SHALLEY ON BEHALF OF AT&T

Ty Shalley, being duly sworn, deposes and states:

- 1. My name is Ty Shalley. I am employed by Michael Baker International LLC ("Michael Baker") as a Geographic Information System ("GIT") Specialist. My work address is 1375 Capital Blvd, Room 115, Reno, NV 89502. I am fully competent to make this affidavit and I have personal knowledge of the facts stated in this affidavit.
- 2. My work responsibilities include acquisition and maintenance of spatial data, data analysis, and cartographic representation.
- 3. AT&T Services, Inc. ("AT&T") has retained Michael Baker to provide various GIS services for a number of AT&T entities including Nevada Bell Telephone Company, LLC d/b/a AT&T Nevada and AT&T Wholesale ("AT&T Nevada").
- 4. Specifically, AT&T requested a mapping of wireless service coverage in Lander and White Pine counties for use in AT&T Nevada's Application for a Change in its Provider of Last Resort Service Area ("Application").
- 5. In preparing Exhibits 1- 5 attached to the Application, I relied on mobile broadband coverage data available on the Federal Communications Commission's ("FCC") National Broadband Map, which is broken down by provider and technology type for each state in the US. For this analysis, I downloaded the shapefile data of AT&T, Inc., T-Mobile USA, Inc., and Verizon Communications Inc. focused on 4G LTE, 5G-NR

(35/3 Mbps), and 5G-NR (7/1 Mbps) technology types, which enable wireless voice service.

- 6. The mobile broadband coverage data is displayed using a standardized lattice of hexagonal polygons about 700' with a length of about 700' on each side. The latest release of this data was used, which had been updated as of December 31, 2023.
- 7. I prepared **Exhibits 1 5** by overlaying the shapefile data onto a map of AT&T Nevada's POLR areas to determine wireless coverage availability. The resulting coverage maps identify only those POLR areas that are serviced by at least two wireless providers and form the basis of the Application for POLR relief. This Application is based on the presence of one facilities-based provider and at least one reseller of facilities-based coverage.
- 8. I hereby verify that the maps attached as **Exhibits 1-5** to the Application accurately reflect the shapefile data downloaded from the FCC's National Broadband Map site and AT&T Nevada's exchange areas with POLR obligations.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is

true and correct.

Tv Shalley

20 SUL 24 Date

SUBSCRIBED AND SWORN BEFORE ME this 30 day of July, 2024.

KRIS A WELLS
Notary Public, State of Nevada
Appointment No. 08-7497-2
My Appt. Expires Jul 29, 2028

Notary Public in and for the State of Nevada My commission expires:

7-29-28

Exhibit 7Samples of Customer Notifications

Consumer Bill Page message:

IMPORTANT NOTICE

AT&T Nevada filed an application with the Public Utilities Commission of Nevada

(PUCN) requesting modification to its regulatory designation as a provider of last

resort (POLR) in portions of its service territory. This filing will update POLR areas

based on updated coverage information for the state of Nevada.

It's important to note that this filing does not change your current phone service.

AT&T has been providing service in Nevada for over 100 years, and we remain

committed to delivering high-quality voice and internet services for many years to

come.

The PUCN will hold consumer sessions in Lander and White Pine counties, where

you can ask questions or share your comments about the application. The PUCN

will issue a public notice with the details of the consumer sessions, including the

time, date and location. You're welcome to attend either of the sessions.

For more information, go to: att.com/nevadapolr.

<COMPANY NAME>

ATTN: TELECOMMUNICATIONS MANAGER

<STREET ADDRESS>

<CITY>,<STATE> <ZIP>-<PLUS4>

Dear Telecommunications Manager,

Learn about AT&T's recent application to the Public Utilities Commission of Nevada.

What's happening

AT&T has filed an application with the Public Utilities Commission of Nevada (PUCN) requesting to modify its designation as a POLR in portions of its service territory. No changes are being made to existing phone service as a result of this filing.

Why we're doing it

AT&T is committed to bringing Nevadans the latest modern communications. Thanks to recent investment and additional investment from other providers, most consumers now have access to multiple choices for how they connect. As a result of this investment, AT&T is seeking to update its POLR service areas based on the availability of mobile voice alternatives.

FREQUENTLY ASKED QUESTIONS ABOUT THIS APPLICATION

How will I know if my AT&T home phone service will be impacted?

No changes are being made to your phone service because of this filing.

Will AT&T Nevada customers lose service?

No AT&T customer in Nevada will be left without service. To fulfill existing regulatory requirements, we are seeking to change POLR service areas in light of the availability of mobile voice alternatives. AT&T has provided service in Nevada for over 100 years and looks forward to continuing our high-quality voice and Internet for many years to come.

Will Nevada consumers have access to 911 services?

Yes. Nevada consumers will continue to have access to voice services including 911 and emergency services.

For the latest information, go to: att.com/nevadapolr.

Exhibit 8Sample of Letter being sent to PSAPs



DATE

PSAP CONTACT
PSAP ADDRESS
PSAP CITY STATE ZIP

Re: AT&T Nevada Provider of Last Resort Designation

Dear PSAP CONTACT:

AT&T Nevada has filed an application with the Public Utilities Commission of Nevada ("PUCN") requesting relief from its designation as a provider of last resort ("PLR") in portions of its service territory in Lander and White Pine Counties.

AT&T Nevada is required by law to conduct a meeting regarding the application with each Public Service Answering Point ("PSAP")/law enforcement agency located within the area where relief is sought. We will be contacting you soon to schedule a meeting.

AT&T Nevada looks forward to continuing to serve Nevada, including the areas where it seeks PLR relief, with high quality voice and internet services. The application filed with the PUCN simply seeks to remove a regulatory designation that was placed on AT&T Nevada and not its competitors.

The PUCN will be conducting consumer sessions in both counties regarding the application. Customers may attend the consumer sessions to make inquiries or comments concerning the application. The PUCN will issue a public notice identifying the time, date, and location of the consumer sessions.

Maps showing detail where relief is being requested, an explanation of PLR, and a copy of the complete filing, can be found at https://www.att.com/nevadapolr.

If you have any questions concerning this matter please call me to discuss. I can be reached at (702) 290-5358.

Sincerely,

Omar Saucedo

Director – External Affairs

AT&T Nevada

Exhibit 9 Draft Public Notice

PUBLIC UTILITIES COMMISSION OF NEVADA DRAFT NOTICE

(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

Application for Relief from Designation as a Provider of Last Resort in certain areas in Lander and White Pine Counties pursuant to NRS 704.68886.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Nevada Bell Telephone Company, d/b/a AT&T Nevada and AT&T Wholesale

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled <u>AND</u> the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

Pursuant to Nevada law, AT&T Nevada filed an application with the PUCN requesting relief from its regulatory designation as a provider of last resort in portions of its service territory in Lander and White Pine Counties. AT&T Nevada will continue to provide customers with high quality voice and internet services.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1)¹:

The PUCN will be conducting a consumer session regarding the application in Lander County and White Pine County pursuant to NRS 704.68886.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

N/A.

¹ NRS 704.069 states in pertinent part:

^{1.} The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:

⁽a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and

⁽b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

CERTIFICATE OF SERVICE

1 2 I hereby certify that I have this day served the foregoing document upon the Public 3 Utilities Commission of Nevada by electronic filing and also to the following parties at the 4 recipient's current electronic mail address, properly addressed to: 5 Ernest Figueroa, Esq. Don Lomoljo, Esq. 6 Consumer Advocate Staff Counsel Bureau of Consumer Protection Public Utilities Commission of Nevada 7 100 N. Carson Street 1150 E. William Street Carson City, NV 89701 Carson City, NV 89701 8 BCPServ@ag.nv.gov pucn.sc@puc.nv.gov 9 Manny Lopez Manager, Resource and Market Analysis 10 Public Utilities Commission of Nevada 11 1150 E. William Street Carson City, NV 89701 12 lopez@puc.nv.gov 13 14 15 16 17 18 Dated this 31st day of July, 2024 19 20 21 David Collier Lead, Regulatory Relations 22 23

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