

State of Florida



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# Public Service Commission

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CLERK

-M-E-M-O-R-A-N-D-U-M-

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**DATE:** April 2, 2009  
**TO:** Ann Cole, Commission Clerk - PSC, Office of Commission Clerk  
**FROM:** Nancy E. Pruitt, Regulatory Analyst III, Division of Regulatory Compliance *Y*  
**RE:** Docket No. 090082-TL - Petition by BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast for waiver of Rule 25-4.040(2), Florida Administrative Code.

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Please place in the above referenced docket file this memorandum and the attached eight pages of e-mails between Commission staff and AT&T that request clarifying information concerning the requested rule waiver.

DOCUMENT NUMBER-DATE

02916 APR-28

FPSC-COMMISSION CLERK

**Nancy Pruitt**

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**From:** Beth Salak  
**Sent:** Tuesday, March 31, 2009 1:44 PM  
**To:** Laura King; Nancy Pruitt  
**Subject:** FW: White Page Directories.

fyi, I thought I would pass along the emails I exchanged with ATT on the white page listings BEFORE the waiver was filed.

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**From:** Follensbee, Greg [mailto:gf1389@att.com]  
**Sent:** Tuesday, February 03, 2009 3:14 PM  
**To:** Beth Salak  
**Cc:** Greer, Stan L  
**Subject:** RE: White Page Directories.

As of today we do plan to provide the CD-ROMs for all 4 trials, but we may decide to stop providing for remaining planned trail cities in Florida after the waiver is granted and trail results in other states indicate customers who aren't getting the CD-ROM or paper copies during their trail are accepting the new process with little concern. To date the few trials we have started for designated areas in other states are showing less than 1% who call to request a paper copy irrespective of whether we did or did not send a CD-ROM. We don't have results yet for those just requesting a CD-ROM who didn't get that medium either. These are very preliminary results so having more done both ways will help us decide how best to satisfy our customers on this issue. Thank you again for the support you are providing us on this issue.

Greg Follensbee  
 Executive Director  
 AT&T Services, Inc.  
 850-577-5555 (V)  
 850-443-8665 (C)

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**From:** Beth Salak [mailto:BSalak@PSC.STATE.FL.US]  
**Sent:** Tuesday, February 03, 2009 3:04 PM  
**To:** Follensbee, Greg  
**Subject:** RE: White Page Directories.

So for the 4 trials, every customer will get a cd-rom even if you've filed for the waiver? These are trials because you are starting only in 4 areas and not statewide? In other words, you're planning on doing this no matter what happens in the trials? After the waiver, nothing will be given to the customer for white pages unless the customer elects (asks) to get either a paper copy or a cd-rom?

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DOCUMENT NUMBER-DATE  
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Thanks again, Greg.

Beth

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**From:** Follensbee, Greg [mailto:gf1389@att.com]  
**Sent:** Tuesday, February 03, 2009 2:36 PM  
**To:** Beth Salak; Greer, Stan L  
**Cc:** Dale Mailhot; Sally Simmons  
**Subject:** RE: White Page Directories.

For the 4 areas in the trials we will be providing a CD-ROM in all cases, and will allow a customer to call to receive a paper copy. The petition we will be filing will request relief from providing the CD-ROM as well in every case, and will allow the customer to choose a paper copy, a CD-ROM or nothing. In either scenario the customer can request a paper copy. Our first trial will be in June with the Jacksonville directories scheduled for delivery.

Greg Follensbee  
 Executive Director  
 AT&T Services, Inc.  
 850-577-5555 (V)  
 850-443-8665 (C)

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**From:** Beth Salak [mailto:BSalak@PSC.STATE.FL.US]  
**Sent:** Tuesday, February 03, 2009 2:28 PM  
**To:** Greer, Stan L; Follensbee, Greg  
**Cc:** Dale Mailhot; Sally Simmons  
**Subject:** White Page Directories.

Greg and Stan,

I read your letter and I'm a bit confused on the time line. On page 2 you mention 4 areas you would like to run trials giving out the CD-ROM in 2009 and then expand to Ft. Lauderdale in 2010. In footnote 1, on page 1, you say you're going to file a petition "In the near future" asking for approval to cease providing white pages in the form of hard copies or CD-ROM. How do these 2 statements lie down together? Also, I think the last sentence in footnote 1 states a hard copy will still be available, but I can read that sentence to say, where a CD-ROM is available, that would be your only option. Will a hard copy be available whether the CD-ROM is available or not? When would your 2009 trials begin?

Thanks.

Beth

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**Nancy Pruitt**

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**From:** Greer, Stan L [sg7766@att.com]  
**Sent:** Tuesday, March 10, 2009 5:18 PM  
**To:** Nancy Pruitt  
**Subject:** Docket No. 090082-TL - White Page Listings  
**Attachments:** Florida Response OPC Questions.doc

Hey Nancy,

I wanted to send you a copy of the information I provided to OPC. I am still checking on the News To Use section information and I have gotten a question back. How long would you want the News To Use piece to run. As you know that section is limited and I don't believe we have a problem placing something in there but I think putting it in there every month maybe a problem. What about if we put it in the News To Use section either the month before the New directories come out or the month after the new directories come out. We didn't talk about this detail. Can you check and see exactly what you are thinking on that?  
Thanks

<<Florida Response OPC Questions.doc>>

Stan L. Greer  
AT&T Florida  
Area Manager - Regulatory Relations  
Phone - (850) 577-5552

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**AT&T Florida Responses to OPC Questions in Docket No. 090082-TL**

1. Did AT&T do a statistical study to evaluate the white page directory approach?

**Answer:** Yes, AT&T conducted confidential statistical studies for the Southeast and West markets in 2007 and 2008, respectively, where it proposed to eliminate the residential portion of The Real White Page Listings (TRWP), including Florida. In the initial Southeast study, the research did not distinguish between residential and business white page listings. This study indicated that the average customer was using this combined product approximately 1.69 times per month. In a subsequent study of additional markets outside of the southeast region, questions were directed specifically at usage of just the residential section of the white pages. This study indicated that customers only used the directory 0.84 times within the past 30 days. In addition, the study shows that in the Southeast, 73% of the customers believed it acceptable to make the TRWP available only by request.

2. Has any other state Commission approved the elimination of the TRWP?

**Answer:** Yes. The process has been raised in several other states. Oklahoma changed its rules to allow what is being proposed. Indiana's regulatory treatment changed and therefore AT&T proposal was not an issue. Ohio approved a waiver similar to this one. AT&T has sent a letter to the Wisconsin Commission concerning the proposed changes to the automatic delivery of printed residential white pages listings.

3. Has AT&T received any complaints with the proposed elimination of the TRWP?

**Answer:** As far as the Austin and Atlanta trials, the 4 or so complaints raised in Austin were associated with concerns about reaching an automated system after hours for ordering a white page directory. AT&T knows of only one complaint about the change in process.

4. Does AT&T have any plans to eliminate additional white pages besides the 4 trial areas?

**Answer:** At this time, AT&T does not intend to eliminate the provision of, on an up-front basis, the white page residential listings for any areas other than the 4 listed in its petition and the Ft. Lauderdale area. However, AT&T may expand this program in 2010 and in future years to encompass more markets in Florida.

5. Will AT&T consider placing something on the cover that indicates white page listings can be requested?

**Answer:** Yes. AT&T is planning on placing verbiage on the cover that refers the customer to the customer guides for ordering a printed directory of residential listings. We are currently marking up an example so you can see the final product.

6. Will AT&T change the red Business listing to another visible color?

**Answer:** Yes. AT&T will change the Business logo on the cover of the directory from red to white.

7. If the Commission approves the petition as filed, what would be the impact on the various directories in the given markets?

**Answer:** If the Commission approves the petition, AT&T will provide a directory without the residential white page listings for the given directory. The customer will be made aware of the fact that the directory doesn't include the residential white page listing consistent with our petition and the added items discussed above. If the white page listings are EAS listings included in other directories, the EAS listings will also be removed from the corresponding directory. Each customer covered by a main directory will be able to get a copy of the residential white page directory for that area. If the customer's EAS listings are being removed, the customers will be given all of the notices and options as customers in the given area.

## Nancy Pruitt

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**From:** Greer, Stan L [sg7766@att.com]  
**Sent:** Friday, March 27, 2009 3:38 PM  
**To:** Nancy Pruitt  
**Attachments:** 42988 jax cover wp info\_3B.pdf

<<42988 jax cover wp info\_3B.pdf>>

Stan L. Greer  
AT&T Florida  
Area Manager - Regulatory Relations  
Phone - (850) 577-5552

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For more information on how to obtain a free copy of your residential white pages, please look in the Customer Guide.



**Nancy Pruitt**

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**From:** Greer, Stan L [sg7766@att.com]  
**Sent:** Monday, March 30, 2009 10:40 AM  
**To:** Nancy Pruitt  
**Subject:** Re: Directories

That is my understanding. We will put together a white page directory for those folks that request it.

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Sent from my BlackBerry Wireless Handheld (www.BlackBerry.net)

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**From:** Nancy Pruitt  
**To:** Greer, Stan L  
**Sent:** Mon Mar 30 10:23:35 2009  
**Subject:** Directories

Stan, please confirm if I am understanding the content of the directories correctly. In the 4 test areas where a CD will replace the white pages directory, the directory that will be delivered as usual will be The Real Yellow Pages that will contain both the business listings and the advertisements. So there will be no residential white page directory and no business white page directory. Thank you.

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