State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER § 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

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

DATE:

OCTOBER 9, 2000

TO:

DIRECTOR, DIVISION OF RECORDS AND REPORTING

FROM:

DIVISION OF APPEALS (BROWN) MCO

DIVISION OF COMPETITIVE SERVICES (KENNEDY) REK

DIVISION OF ECONOMIC REGULATION (HEWITT)

RE:

DOCKET NO. 990994-TP - PROPOSED AMENDMENTS TO RULES 25-4.003, F.A.C., DEFINITIONS; 25-4.110, F.A.C., CUSTOMER BILLING FOR LOCAL EXCHANGE TELECOMMUNICATIONS COMPANIES; 25-4.113, F.A.C., REFUSAL OR DISCONTINUANCE OF SERVICE BY COMPANY; 25-24.490, F.A.C., CUSTOMER RELATIONS; RULES INCORPORATED; AND 25-24.845, F.A.C., CUSTOMER RELATIONS;

RULES INCORPORATED.

AGENDA:

10/17/00 - REGULAR AGENDA - POST HEARING DECISION

PARTICIPATION IS LIMITED TO COMMISSIONERS AND STAFF

RULE STATUS: ADOPTION SHOULD NOT BE DEFERRED

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\APP\WP\990994.RCM

CASE BACKGROUND

With the development of competition for the provision of telecommunications services, customers have filed numerous complaints with the Commission relating to questionable billing practices by some companies. Several different types of problems relating to customers' bills have caused concern among regulatory bodies in Florida, other states, and at the federal level.

1998, in response to these concerns, the Florida Legislature enacted the "Telecommunications Consumer Protection Act" (Act) (See Chapter 98-277, Laws of Florida.) The Act is contained in Sections 364.601 through 364.604, Florida Statutes. That same year, the Legislature also enacted Section 364.0252,

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Florida Statutes, requiring expanded efforts by the Commission to provide consumer information regarding telecommunications services and to provide assistance to customers in resolving billing and service disputes with telecommunications companies.

Section 364.602, Florida Statutes, provides definitions for the terms "Billing Party;" "Commission;" "Customer;" "Originating party;" and "Information service." Section 364.603, Florida Statutes, provides for the methodology for changing telecommunications providers and is considered to be the "antislamming" section. Section 364.604, Florida Statutes, regulates telecommunications companies' billing practices.

Section 364.0252, Florida Statutes, requires expanded customer and programs assistance to customers telecommunications billing and service disputes. It permits the Commission to require long distance and local telecommunications companies to develop and provide information to customers, and it provides that the Commission may specify by rule the types of information to be developed and the manner by which the information will be provided to customers. In 1999, the section was amended to direct the Commission to undertake a comprehensive and ongoing effort to inform consumers regarding how to protect themselves in competitive telecommunications market. Ιt specifically identified as areas of concern Lifeline and Link-Up Programs for low-income households and alerting consumers to how they can avoid having their service changed or unauthorized charges added to their telephone bills.

The Commission held workshops around the state to gather input from customers about problems customers faced with telecommunications billing. The workshops were held in West Palm Beach, Ft. Lauderdale, Miami, Tampa, Orlando, Jacksonville, and Tallahassee between February 4 and April 7, 1999. A rule development workshop was held in Tallahassee on September 28, 1999, and post workshop comments were filed. Thereafter, the Commission proposed comprehensive changes to its billing rules to implement the Telecommunications Consumer Protection Act. The majority of the proposed rules were adopted without objection and were effective July 5, 2000. In response, however, to concerns raised by ALECs and IXCs, the Commission scheduled a rule hearing on whether two subsections of the proposed rules, 25-4.110(2), concerning bill content, and 25-4.110(19), concerning a billing restriction option, should be applied to ALECs and IXCs.

The rule hearing was held on August 21, 2000. The Commission heard presentations and testimony by four staff witnesses and six

industry representatives. Post-hearing comments were filed on September 13, 2000. This is staff's recommendation that based on the record the Commission should not apply the provisions of Rule 25-4.110(2) and (19) to ALECs and IXCs at this time.

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DISCUSSION OF ISSUES

ISSUE 1: Should the Commission adopt the proposed amendments to Rule 25-24.490, Florida Administrative Code, Customer Relations; Rules Incorporated, and Rule 25-24.845, Florida Administrative Code, Customer Relations; Rules Incorporated, whereby the billing requirements of Rule 25-4.110(2), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, would apply to interexchange telecommunications companies (IXCs) and alternative local exchange companies (ALECs)?

RECOMMENDATION: No. Staff recommends that at this time the Commission should not adopt the proposed amendments to Rule 25-24.490, Florida Administrative Code, Customer Relations; Rules Incorporated, and Rule 25-24.845, Florida Administrative Code, Customer Relations; Rules Incorporated, whereby the billing requirements of Rule 25-4.110(2), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, would apply IXCs and ALECs.

STAFF ANALYSIS: Rule 25-4.110(2), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, provides:

- (2) Six months after the effective date of this rule, each billing party shall set forth on the bill all charges, fees, and taxes which are due and payable.
- (a) There shall be a heading for each originating party which is billing to that customer account for that billing period. The heading shall clearly and conspicuously indicate the originating party's name. If the originating party is a certificated telecommunications company, the certificated name must be shown. If the originating party has more than one certificated name, the name appearing in the heading must be the name used to market the service.
- (b) The toll-free customer service number for the service provider or its customer service agent must be conspicuously displayed in the heading, immediately below the heading, or immediately following the list of charges for the service provider. For purposes of this subparagraph, the service provider is defined as the company which provided the service to the end user. If the service provider has a customer service agent, the toll-free number must be that of the customer service agent and must be displayed with the service provider's heading or with the customer service agent's heading, if

- any. For purposes of this subparagraph, a customer service agent is a person or entity that acts for any originating party pursuant to the terms of a written agreement. The scope of such agency shall be limited to the terms of such written agreement.
- (c) Each charge shall be described under the applicable originating party heading.
- (d) 1. Taxes, fees, and surcharges related to an originating party heading shall be shown immediately below the charges described under that heading. The terminology for Federal Regulated Service Taxes, Fees, and Surcharges must be consistent with all FCC required terminology.
 - 2. The billing party shall either:
- a. Identify Florida taxes and fees applicable to charges on the customer's bill as (including but not limited to) "Florida gross receipts tax," "Franchise fees," "Municipal utility tax," and "Sales tax," and identify the assessment base and rate for each percentage based tax, fee, and surcharge, or
- b.(i) Provide a plain language explanation of any line item and applicable tax, fee, and surcharge to any customer who contacts the billing party or customer service agent with a billing question and expresses difficulty in understanding the bill after discussion with a service representative.
- (ii) If the customer requests or continues to express difficulty in understanding the explanation of the authority, assessment base or rate of any tax, fee or surcharge, the billing party shall provide an explanation of the state, federal, or local authority for each tax, fee, and surcharge; the line items which comprise the assessment base for each percentage based tax, fee, and surcharge; or the rate of each state, federal, or local tax, fee, and surcharge consistent with the customer's concern. The billing party or customer service agent shall provide this information to the customer in writing upon the customer's request.
- (e) If each recurring charge due and payable is not itemized, each bill shall contain the following statement:

"Further written itemization of local billing available upon request."

Section 364.604 of the Telecommunications Consumer Protection Act and Section 364.0252, Florida Statutes, provide the Commission

the specific authority to adopt this rule and apply it to ALECs and IXCs. Section 364.604 states:

- (1) Each billing party must clearly identify on its bill the name and toll-free number of the originating party; the telecommunications service or information service billed: and the specific charges, taxes and fees associated with each telecommunications or information The originating party is responsible for service. the billing party with all required providing The toll-free number of the originating information. party or its agent must be answered by a customer service representative or a voice response unit. If the customer reaches a voice response unit, the originating party or its agent must initiate a response to a customer inquiry within 24 hours, excluding weekends and holidays. Each telecommunications carrier shall have until June 30, 1999, to comply with this subsection.
- (2) A customer shall not be liable for any charges for telecommunications or information services that the customer did not order or that were not provided to the customer.
- (3) Every billing party shall provide a free blocking option to a customer to block 900 or 976 telephone calls.
- (4) A billing party shall not disconnect a customer's Lifeline local service if the charges, taxes, and fees applicable to basic local exchange telecommunications service are paid.
- (5) Pursuant to Section 120.536, the Commission may adopt rules to implement this section.

Section 364.0252, Florida Statutes, states:

The Florida Public Service Commission shall expand its current customer information program to inform consumers of their rights as customers of competitive telecommunications services and shall assist customers in resolving any billing and service disputes that customers are unable to resolve directly with the company. The commission may, pursuant to this program, require all telecommunications companies providing local or long distance telecommunications services to develop and provide information to customers. The commission may

specify by rule the types of information to be developed and the manner by which the information will be provided to the customers. The Florida Public Service Commission shall undertake a comprehensive and ongoing effort to inform consumers regarding how to protect themselves in a competitive telecommunications market. Of specific concern are informing consumers concerning the availability of the Lifeline and Link-Up Programs for low-income households and alerting consumers to how they can avoid having their service changed or unauthorized charges added to their telephone bills.¹

In their presentations at the hearing and in their written comments the ALECs and IXCs urged the Commission not to apply Rule 25-4.110(2) to them at this time. The ALECs argued that in order to encourage the development of competition in the provision of

At present, Section 364.0252, Florida Statutes, is not included in Rule 25-4.110, Florida Administrative Code, as a specific law implemented. The question of its applicability was raised at the August 21, 2000, rule hearing, and the participants were asked to address it in their post-hearing comments. At the hearing and in post-hearing comments some participants asserted that the Commission could not rely on that provision as authority to adopt its rules, because it had not been included when the proposed rules were initially noticed, and it was too late in the process to include the statute now. In its post-hearing comments FCTA cited the case of Save the Manatee Club, Inc. V. Southwest Florida Management District, 00 ER FALR 061 (12/9/99) as authority for that position. The case is not applicable to this rulemaking because it involved a rule challenge at DOAH where the issue of additional statutory authority was first raised as a defense in the rule challenge proceeding, not during the course of the rulemaking proceeding itself. Those who objected to inclusion of the statute in this rule asserted that the Commission would have to initiate rulemaking again if it wished to include it. That is incorrect. The addition of a statutory section in the specific authority/law implemented portion of a rule is a technical change or correction that may even be made to a rule after it is adopted by letter to the Department of State requesting the correction. Such a change does not require rulemaking in the first instance, certainly be made at any time while the rulemaking is in progress. Therefore, staff will be sending such a letter to the Department of State to include Section 364.0252, Florida Statutes, as specific authority for, and law implemented by, Rule 25-4.110, Florida Administrative Code.

telecommunications in Florida, Section 364.01, Florida Statutes, directs the Commission to provide to new entrants more flexible regulatory treatment and a lesser level of regulatory oversight than that provided to incumbent providers. They asserted that the bill content rule would not provide them the flexibility to meet their customers' billing requests, and they claimed that it would impose unnecessary costs on a fledgling industry.

The IXCs argued that they were not billing for other entities at present, and when they did bill their own customers they were complying with the FCC's truth-in-billing guidelines. They asserted that the specific formatting and placement requirements of Rule 25-4.110(2) were more restrictive than the FCC's guidelines and would require them to make costly adjustments to their national billing systems.

Both ALECs and IXCs pointed to staff witness Durbin's testimony and exhibits to show that cramming complaints were lessening, and no billing complaints had been filed against ALECs or IXCs. (TR 68) They asserted that this evidence supported their contention that the application of the bill content rule to them at this time would be a "solution in search of a problem." They argued that the specific requirements of Section 364.604, Florida Statutes, would provide the necessary clarity in customers' telephone bills, and no more specificity was needed. They also argued that to the extent that the rule simply "parroted" the statute, it was unnecessary.

BellSouth countered the other participants' arguments by asserting that all telecommunications providers should be subject to the provisions of Rule 25-4.110(2), in order to provide adequate and equal protection to all telecommunications customers in Florida. BellSouth asserted that in a competitive environment all companies should be subject to the same regulation.

It is staff's opinion that Sections 364.04 and 364.0252, Florida Statutes, (as well as Sections 364.19 and 364.337) clearly provide the Commission the specific authority to regulate by rule the clarity and content of the information contained in all telecommunications companies' bills. (See also, comments of AT&T at the hearing, TR 195.) It is also staff's opinion that Rule 25-4.110(2) does not simply "parrot" the statute. It prescribes with specificity the manner by which telecommunications companies must comply with the more general requirement for information in section 364.604(1).

There is, however, little, if any, evidence that customers are experiencing problems with ALECs' or IXCs' bills. The record demonstrates that the problems the rule is designed to address -customer confusion and unauthorized charges -- have occurred primarily with incumbent local exchange companies' bills, because they are the ones who are billing for other entities at this time. Witness Durbin's exhibits (EX 3-5) indicate that their billing problems, too, although far from eradicated, have been declining recently. The evidence does not show that ALECs and IXCs are even billing for other entities at present. (TR 173, late-filed EX 7.) Further, the sample bills provided as late-filed exhibits by the ALEC and IXC participants and their presentations at the hearing indicate that they are presently complying with the statute, and the spirit, if not the letter, of Rule 25-4.110(2), Florida Administrative Code. (EX 8-10, Attachment A to this recommendation.)

In light of these facts, staff recommends that the Commission should not apply Rule 25-4.110(2), Florida Administrative Code, to the ALECs and IXCs at this time. While we acknowledge BellSouth's position that generally all telecommunications providers should be subject to the same regulation, Section 364.01, Florida Statutes, recognizes that that policy may not be appropriate in every instance in a developing competitive market. When competitive telecommunications markets in Florida mature more, and the Commission receives evidence that a problem is developing, the Commission could apply this rule to ALECs and IXCs then. In the meantime, IXCs and ALECs are required to comply with the requirements of Section 364.604, Florida Statutes, and the Commission has the authority to take appropriate action if they fail to do so.

ISSUE 2: Should the Commission adopt the proposed amendments to Rule 25-24.490, Florida Administrative Code, Customer Relations; Rules Incorporated, and Rule 25-24.845, Florida Administrative Code, Customer Relations; Rules Incorporated, whereby the billing restriction requirements of Rule 25-4.110(19), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, would apply to IXCs and ALECs?

RECOMMENDATION: No. Staff recommends that the Commission should not adopt the proposed amendments to Rule 25-24.490, Florida Administrative Code, Customer Relations; Rules Incorporated, and Rule 25-24.845, Florida Administrative Code, Customer Relations; Rules Incorporated, whereby the billing restriction requirements of Rule 25-4.110(19), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, would apply to IXCs and ALECs at this time.

STAFF ANALYSIS: Rule 25-4.110(19), Florida Administrative Code, Customer Billing for Local Exchange Telecommunications Companies, provides:

- (19) (a) Within one year of the effective date of this rule and upon request from any customer, a billing party must restrict charges in its bills to only:
- 1. Those charges that originate from the following:
 - a. Billing party or its affiliates;
 - b. A governmental agency;
- c. A customer's presubscribed intraLATA or interLATA interexchange carrier; and
- 2. Those charges associated with the following types of calls:
 - a. Collect calls;
 - b. Third party calls;
 - c. Customer dialed calls; and
 - d. Calls using a 10-10-xxx calling pattern.
- (b) Customers must be notified of this right by billing parties annually and at each time a customer notifies a billing party that the customer's bill contained charges for products or services that the customer did not order or that were not provided to the customer.
- (c) Small local exchange telecommunications companies as defined in Section 364.052(1), F.S., are exempted from this subsection.

In preparing this recommendation, staff reviewed the records from the June 6, 2000, Agenda Conference. During the Agenda Conference, representatives from the small LECs argued that the cost to implement the billing restrictions required by Rule 25-4.110 (19), Florida Administrative Code, was prohibitive. The representatives also argued that Rule 25-4.110(19), Florida Administrative Code, should not be applied to small LECS because the number of consumer complaints filed with the Division of Consumer Affairs regarding unauthorized charges on customer's bills were few in number, if any; therefore a billing restriction option for their customers was unnecessary. In response to the small LEC's concerns, the Commission exempted small LECs from Subsection 19 of Rule 25-4.110, Florida Administrative Code.

Throughout the rule hearing on August 21, 2000, several IXC and ALEC industry representatives echoed the same concerns, cost and necessity, raised by the small LECs during the June 6, 2000, Agenda Conference. Like the small LECs, representatives of the IXCs and ALECs claimed that the cost to implement the billing restriction option would be so great that it would effectively preclude telecommunications companies from competing in the market place, cost consumers more, and impede entrance of newcomers into the market. AT&T noted that Chapter 120, Florida Statutes, provides that the Commission must adopt rules that are less costly as long as they substantially accomplish the regulatory objectives. AT&T argued that Subsection 18 of Rule 25-4-110, Florida Administrative Code, which already applies to IXCs and ALECs, is a less costly alternative to the billing restriction and accomplishes the regulatory objective in Section 364.604(2), Florida Statutes, that customers will not be held liable for charges that they did not incur. (TR 198)

The industry was concerned that the Statement of Estimated Regulatory Cost (SERC) prepared by Commission staff did not adequately address the cost for implementing the billing restriction option of Rule 25-4.110, Florida Administrative Code. The industry suggested that a new SERC be initiated because a sufficient number of ALECs and IXCs had not been queried. In response to questions regarding the number of companies that would be affected by the billing restriction option and the cost to implement this option, witness Hewitt explained that he did not know the number of companies that would be affected and the cost estimates he had received from six respondents varied from thousands to millions of dollars. Based on the record, staff received relatively few responses to the SERC request, and it is not clear how many IXCs and ALECs would be affected by Rule 25-4.110 (19), Florida Administrative Code.

During the hearing, Commission witness Durbin was asked if any of the 2,996 cramming complaints identified on Hearing Exhibit 5 involved complaints by customers of ALECs at the time they lodged the complaints. Witness Durbin responded "[n]ot to my knowledge, no." Witness Durbin was also asked if he were aware of any such complaints by ALEC customers regarding the content of their bills. Witness Durbin responded "[n]o, I'm not." (TR 68) Only a few ALECs and IXCs participated at the hearing, but each claimed that data provided by witness Durbin supports the argument that the billing restriction option is a solution looking for a problem. The record indicates that there are relatively few consumer complaints about unauthorized charges when consumers are billed directly by an ALEC or IXC.

In his testimony regarding applicability of the billing restriction option to IXCs and ALECs, staff witness Moses explained that when a company bills for an entity other than itself, it is just as susceptible to fraud as any other billing system, such as the ILECs. (TR 84-85) In response to a question that asked if we are not clear on the costs to implement a billing restriction, technologically unsure how to implement it, and ALEC customers have not complained, how can we be sure that a billing restriction should apply to ALECS, Witness Moses stated his belief that the Commission needs to take a proactive approach instead of a reactive approach and prevent cramming before it happens, should the IXCs and ALECs open their billing systems (bill for other entities). (TR 85, 117-118)

In light of the fact that ALECs and IXCs are not billing for other entities, the fact that the industry claims the costs to implement a billing restriction are great, and consumers have not filed many, if any, complaints regarding cramming when directly billed by ALECs and IXCs, staff recommends that the Commission should not apply Rule 25-4.110(19), Florida Statutes, to ALECs and When competitive local telecommunications IXCs at this time. markets in Florida mature more, and the Commission receives evidence that a problem is developing, the Commission could apply this rule to ALECs and IXCs then. In the meantime, IXCs and ALECs are required to comply with the requirements of subsection 18 of Rule 25-4.110, Florida Administrative Code, which requires the billing party to remove certain charges from bills upon customer notification that the service billed was not provided, or the item charged was not ordered.

ISSUE 3: Should the rules be filed for adoption and this docket closed?

RECOMMENDATION: No. The rules should not be filed for adoption, but this docket may be closed.

STAFF ANALYSIS: If the Commission approves staff's recommendation on Issues 1 and 2, the rules should not be filed for adoption and this docket may be closed.

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TALLAHASSEE, FL 32308-2857



Page: 1
Billing Period Ending: 7/05/00
Invoice Date: 7/06/00

Customer Number:

Balance Forward	Account Adjustments	SPRINT Charges	SPRINT Discounts	Taxes and Regulatory Rel. Charges	Current Total	Amount Due By 7/29/00
\$.00	\$.00	\$43.65	-\$30.00	\$3,26	\$16:91	\$16.91

Important Information from Sprint:



Beginning with customer payments received after August 1, 2000, the Return Check Fee (Non-Sufficient Funds charge) will increase from \$10 to \$15.



This is your new long-distance bill Sprint employees will now receive their long-distance charges in a separate invoice. Simplify your payments with MySAM online or your credit card! Go to www.sprint.com or call 1-800-877-EMPL.



Join us online at www.sprint.com to browse our catalog of products and services or to access Sprint's outstanding Customer Service. You can order additional services, check account balances and manage your account online.

If you have any questions about your invoice, please call Customer Service at 1-800-877-3675, or visit us at http://www.sprint.com.



Sprint continually supports the preservation of global natural resources-by providing you invoices printed on sides of recycled paper. This process saves approximately 30 million printed pages and 2,000 trees per y Paper used for this invoice is made from recycle material containing 50 percent recycled paper.



KEY RATING INFORMATION

TERMS AND CONDITIONS

Thank you for using Sprint.

The following terms and conditions are applicable only to Sprint long distance services billed on this invoice. If you subscribe to Spr PCS services whose charges may be included on this invoice, separate terms and conditions are applicable.

This bill is due and payable upon presentation, and is past due if unpaid after the date shown on page one of this invoice. Residen customers will be assessed a late fee on balances that remain unpaid for more than 30 days from the invoice date. The late fee will applied to the entire unpaid baffance, including taxes. The late fee will be an amount not greater than the maximum amount allowable law in the staterin which the customer resides. Please make check or money order payable to Sprint in U.S. Dollars. Do not send cash your payment is not received within 30 days of the invoice date, or within the time allowed by your state's Public Utility Commissi Sprint may begin procedures to cancel all service to you. You will be informed of such an action if required by law.

If any check sent to Sprint in payment for services is returned unpaid by your bank, you will be charged \$10,00, or the highest amorallowed by applicable law, for each returned check, whichever is less:

If you have any questions about your bill, please call us: the number is shown on page one of this bill. Most of your questions can quickly and conveniently handled to your satisfaction over the phone.

If you would like to question an item on your bill or comment on our service in writing, please address your letter to:

SPRINT Customer Service P.O. Box 152046 Irving, TX 75015-2048

Please include your name, account number, the specific question or comment about the bill, and the dollar amount of the item(s) question. We assure you we will respond to your letter as soon as possible.

While the item(s) in question are being investigated, you do not have to pay them; however, the amount not in question is still due a payable upon receipt of your bill:

It is Sprint's policy to bill all'calls'to a customer within the next billing cycle after the calls are made. In some instances, however, y may receive a bill with calls that were made three or more months prior to the invoice date of the bill. In the event the total amount such calls on one bill equals or exceeds \$50; you may request a deferred payment plan.

NOTICE OF JURISDICTION

Pursuant to K.S.A. 60-308 (b) (11), as a business customer, you may be subject to jurisdiction in Kansas for any dispute relating to yo telephone service with Sprint. This is because you have arranged for or continued to receive phone service managed, operated monitored in the State of Kansas.

DEPOSITS

Sprint will refund any required deposit in accordance with the applicable rules of your Public Utility Commission.

CUSTOMER REQUEST FOR DISCONNECT

Sprint will disconnect your service within 30 days after receiving your request for disconnect, or such shorter term and under suc conditions as may be required by your Public Utility Commission.

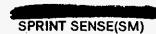
CHANGE OF ADDRESS OR ACCOUNT HOLDER NAME

Address changes may be noted on the form found on the back of page one or by calling Customer Service. If account name changes ar necessary, please call the customer service number shown on page one of this invoice.

12.1

ATTACHMENT A PAGE 3 OF 28





Page: 2
Billing Period Ending: 7/05/00
Customer Number:

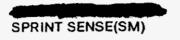
Account Detail

-	SPRINT SENSE(SM)	Calls	Minutes	Amount
united the second	State-to-State	21	212.0	\$27.65
	Operator Service	3	8.0	14.50
	SUBTOTAL ITEMIZED CALLS	24	220.0	\$42.15
procession of	LONG DISTANCE MONTHLY CHARGES PRESUBSCRIBED LINE CHG			Amount
an fire	TOTAL SPRINT CHARGES			\$1.50
SPRINT	DISCOUNTS			
	EMPLOYEE DISCOUNT			-\$30.00
	TOTAL SPRINT DISCOUNTS			-\$30.00
	CURRENT MONTH SUBTOTAL			\$13.65
TAXES	REG. RELATED CHGS.			
	PAYPHONE SURCHARGE @ .26/CALL	3		\$.78
	CITY UTILITY TAX			.03
	CARRIER UNIVERSAL SVC CHG			1.60
	STATE GROSS RCPTS TAX			.37
	FEDERAL EXCISE TAX			.48
	TOTAL TAXES/REG. RELATED CHGS.			\$ 3.26
	CURRENT TOTAL			\$16.91

Itemization of Calls

Nbr	Date	Time	•	Called Local	ion	Called Nbr	Minutes	Charges
1	6/07/00	2:42 PM	Ð	THOMASVL	GA	912	1.0	\$.25
2	6/07/00	9:10 PM	Ň	THOMASVL	GA	912	13.0	1.30
3	6/14/00	9:33 PM	N	CHARLOTTE	NC	704	9.0	.90
4	6/15/00	11:40 AM	D	THOMASVL	GA	912	8.0	2.00
5	6/15/00	11:53 AM	D	THOMASVL	GA	912	4.0	1.00
6	6/17/00	4:09 PM	N	THOMASVL	GA	912	7.0	.70
7	6/17/00	4:18 PM	N	MONTEREY	CA	831	35.0	3.50
8	6/18/00	5:03 PM	N	PASCAGOULA	MS	228	1.0	.10
9	6/18/00	5:04 PM	N	PASCAGOULA	MŞ	228	1.0	.10
10	6/18/00	5:11 PM	N	CHARLOTTE	NC	704	4.0	.40
11	6/19/00	7:00 PM	N	PASCAGOULA	MS	228	1.0	.10
12	6/20/00	9:41 PM	N	THOMASVL	GA	912	10.0	1.00
13	6/21/00	9:53 AM	0	THOMASVL	GA	912	4.0	1,00
14	6/21/00	9:58 AM	D	THOMASVL	GA	912	2.0	.50
15	6/21/00	6:19 PM	D	THOMASVL	GA	912	7.0	1.75
16	6/21/00	6:35 PM	Ð	THOMASVL	GA	912	17.0	4.25
17	6/22/00	9:58 PM	N	MOSS POINT	MS	228	2.0	.20
18	6/25/00	9:55 PM	N	MONTEREY	CA	831	62.0	6.20
19	6/25/00	11:34 PM	N	NEWORLEANS	LA	504	22.0	2.20
20	6/28/00	9:51 PM	N	CHARLOTTE	NÇ	704	1.0	.10
21	6/29/00	8:02 PM	N	CHARLOTTE	NC	704 2 5025	1.0	.10
TOTA	L FOR 85		_				(212.0	\$27.65

If you have any questions, please call Customer Service at 1-800-877-3875, or visit us at http://www.sprint.com.



Page: 3 Biffing Period Ending: 7/05/00 Customer Number:

Itemization of Calls

Nbr	Date	Time	•	Called Location Ca	illed Nbr	Minutes	Charges
1	6/21/00	6:29 PM COLL	D ECT	TALLAHASSE FL 850 STN/STN From THOMASVL, GA		3.0	\$4.50
TOTA	AL FOR 912		•		- 	3.0	\$4.50
INATING	NUMBER:	912					
					· .		
2	· 6/24/00	9:26 AM	N ECT	TALLAHASSE FL 850 PERIPER From THOMASVL. GA		3.0	\$6.00
3	· 6/24/00 7/05/00	COLL 6:28 PM	ECT D	TALLAHASSE FL 850 PERIPER From THOMASVL, GA TALLAHASSE FL 850 STN/STN From THOMASVL, GA	912	3.0 2.0	\$6.00 4.00
3		COLL 6:28 PM COLL	ECT D	PERIPER From THOMASVL, GA TALLAHASSE FL 850	912		

 $^{\circ}D$ = 7am to 7pm Mon-FrI or International peak rate period. $^{\circ}N$ = 7pm to 7am Mon-FrI & wkends or International off-peak rate period.

Call Legend: P = PAYPHONE ORIGINATED CALL

SEP-01-99 WED 03:16 PM

FAX NO.

P. 02/06

RETURN TOP HALF WITH PAYMENT

SPRINT METROPOLITAN METWORKS, INC P.O. BOX 165000/MC 4360 ALTAMONTC SPRINGS, FL 32716-5600 AUGUS: 28, 1998

_....

TOTAL AMOUNT DUE BY SEP. 16, 1999
PAY BEFORE SEP 28 TO AVOID A LATE CHARGE OF 7.07

AMOUNT PAID _____

MAKE CHECKS PAYABLE TO:

adhiddhiladdhidhidhidhidhidhidhidhi

SPRENT
P. O. ROX SETE4
TAMPA, FL
SS639-3764
Hinthillimilallimillimillimilatifi

51654

0917 R

SPRINT METROPOLITAN NETWORKS, IN

PAGE 1 (911) AUGUST 28, 1999

BUSINESS OFFICE NO. 1-800-255-8333 PREVIOUS BALANCE IF ANY IS PAST DUE PLEASE PAY IMMEDIATELY.

PREVIOUS CHARGES	PAYMENT ON 08-17-99	ADJUSTMENTS	PAST DUE BALANCE	CURRENT CHARGES	PAYMENT DUE BY
429.24	487.249	.00	.14	471.43	SEP. 16, 1199

101/45 (1010) 101/45 (1010)

CARRIER SUMMARY

CARRIER SPRINT HETRO NETWORKS, INC ADJUSTHENTS 00.

CURRENT CHARGES

2JATOT

.00

471.63

CONTINUED ON BACK OF THIS PAGE

SEP-01-99 WED 03:17 PM

FAX NO.

P. 03/06

SPRIN	T METROPOLITAN NETV		PAGE 2 (911) UGUST 26, 1999
FOR BILLING INQUIRIES OR TO PLACE AN ORDER CALL, 1-800-255-8333.	·		
SUMMARY OF CURRENT	CHARGES		
LOCAL SERVICE NON-REGULATED SERVICE CHARGES AND CREDITS LONG DISTANCE CALLS TAXES	SEE DET SEE DET SEE DET SEE DET SEE DET	AIL AIL AIL	298.66 22.45 62.45 14.96 53.11
TOTAL CURRENT CHARGES			4:1:471-63-70
LOCAL SERVICE SERVICE - AUG 28 TO SEP 27			
DESCRIPTION TELEPHONE NUMBER HEARING/SPEECH SURCHARGE	QUANTITY 1	UNIT RATE	AMOUNT -09

SEP-01-99 WED 03:17 PM

FAX NO.

P. 04/96

SPRIN	T HETROPOLITAN NET		PAGE (911) UGUST 28, 1999
DESCRIPTION TERM 2-24 MONTHS TELEPHONE NUMBER 407	QUANTITY 1	UNIT RATE	AHOUNT 28.40
HEARING/SPEECH SURCHARGE TERM 2-24 HONTHS TELEPHONE HUMBER 407	1	.09 28.40	.09 28.40
HEARING/SPEECH SURCHARGE TERH Z-24 HONTHS	1	, 09 36.85	.09 36.85
HEARING/SPEECH SURCHARGE TERH 2-24 HONTHS	1	, 09 36,85	. 09 36.85
TELEPHONE HUNBER 407 HEARING/SPEECH SURCHARGE TERH 2-24 HONTHS	1 1	.09 36.85	.09 36,85
TELEPHONE NUMBER 407 HEARING/SPEECH SURCHARGE TERM 2-24 NONTHS	1	.09	.09 36.85
TELEPHONE NUMBER 407 HEARING/SPEECH SURCHARGE TERM 2-24 HONTHS	1 1	.09	.09 36.85
TELEPHONE NUMBER 407 HEARING/SPEECH SURCHARGE TERM 2-24 HONTHS	1 1	.09 26.40	.09 28.40
TELEPHONE NUMBER 407 HEARING/SPEECH SURCHARGE TERM 2-24 HONTHS	1 1	.09 28,40	.09
TOTAL LOCAL SERVICE		26,49	<u> </u>
NON-REGULATED SERVICE SERVICE - AUG 28 TO SEP 27			
DESCRIPTION TELEPHONE NUMBER 407	YTITHAUD	UNIT RATE	THUOHA
MSGLN SHADOW HAILBOX STUTTER TONE MESSAGE WAIT TELEPHONE NUMBER 407	1	3,00 .50	3.00
HSGLN SHADOW MAILBOX STUTTER TONE MESSACE WAIT TELEPHONE NUMBER 407	1	3.00 .50	3.00 .50
MSGLN VOICE MAIL-ELITE STUTTER TONE MESSAGE MAIT TELEPHONE NUMBER 407	1	7.95 .50	7.95 .50
HSGLN SHADOW MAILBOX STUTTER TONE HESSAGE WAIT TELEPHONE NUMBER 407	1	3.00 .50	3.00 .50
HSGLN SHADON HAILBOX STUTTER YONE HESSAGE WAIT	1	3.00 .50	3.00
TOTAL NON-REGULATED SERVICE			22.45

CONTINUED ON BACK OF THIS PAGE

SEP-01-99 WED 03:17 PM

FAX NO.

P. 05/06

SPR	INT HETROPOLIT	AN NETWORKS	i, in 4	07 - E	VST 2	4 □ (911) 26, 1999
CHARGES AND CREDITS						· · · · · · · · · · · · · · · · · · ·
PARTIAL HONTH CHARGE FOR HONRE PARTIAL HONTH CREDIT FOR LOCAL PARTIAL HONTH CHARGE FOR LOCAL SYC. COMM. CHG. 2ND OF 3 INS	L SERVICE DISCO	NTINUED	HED R70408 R70409 R70409	2	_	22.45 28.40 28.40 60.00
TOTAL CHARGES AND CREDITS						82.45
LONG DISTANCE CHARGES						
REF DATE TIME FLACE CALLED 1 JUL 26 64:53:37; SAMFORD FL 2 JUL 27 11:81:36; SAMFORD FL 3 JUL 27 11:14:47; SAMFORD FL 4 JUL 27 11:14:47; SAMFORD FL 5 JUL 29 11:18:16; SAMFORD FL 6 JUL 29 11:58:157; SAMFORD FL 7 AUG 82 83:26:62; SAMFORD FL 8 AUG 82 12:37:14; SAMFORD FL 9 AUG 82 83:84:42; SAMFORD FL 10 AUG 84 87:47:52; SAMFORD FL 11 AUG 85 81:48:19; SAMFORD FL 12 AUG 85 81:68:24; SAMFORD FL 13 AUG 85 82:13:41; SAMFORD FL 14 AUG 85 82:13:41; SAMFORD FL 15 AUG 87 82:64:12; SAMFORD FL 16 AUG 88 83:53:24; SAMFORD FL 16 AUG 89 83:53:28; SAMFORD FL 16 AUG 89 83:53:28; SAMFORD FL 17 AUG 11 12:57:28; SAMFORD FL	407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407- 407-	FROM PLACE	FROM NUMBER	CODE AD AD AD AD AD AD AD AD AD AD AD AD	M1.0 2.0 4.0 7.0 4.0 1.0 4.0 7.0 4.0 7.0 4.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 6.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7	AMOUNT .48 .32 .40 .48 .40 .96 .14 .44 .40 .42 .48 .48 .48
SUBTOTAL FOR 407-100- BILL FROM 407-100- REF DATE TIME PLACE CALLED 1 AUG 19 85:54:00pm SAMFORD FL SUBTOTAL FOR 407-100	HUHFER CALLED 487-323-6267	FROM FLACE '	frak Humber	COBE AE	MIH 1.6	AHOUHT
BILL FROM 407-200- REF DATE TIME PLACE CALLED 1 AUG 46 11:57:15ag SAMFORD FL 2 AUG 26 82:47:84pg SAMFORD FL	HUNGER CALLED	FROM PLACE	FROM NUMBER	CODE AD AD	MIH 3.0 2.0	THUONA 84. 32.
SUBTOTAL FOR 407-400 BELL FROM 407-400 BET DATE TIME PLACE CALLED I JUL 29 11:25:31mm SAMFORD FL 2 AUG 63 64:23:62pm SAMFORD FL 3 AUG 64 61:16:80pm SAMFORD FL 4 AUG 64 62:67:240m SAMFORD FL 5 AUG 65 61:81:35pm SAMFORD FL	NUMBER CALLED 607- 407- 407- 407- 407-	FROM PLACE	FROM HUMBER	CODE AD AD AD AD	MIN 1.0 3.0 1.0 4.6	.84 AMOUNT .16 .40 .16 .64

SEF-01-99 WED 03:17 PM

FAX NO.

P. 06/06

				SPRINT	METROP	OLITAH H	ETWORK	S, IH	•	407-26		5 % (911) 8, 1999
	DATE	TIME	PLACE CA	LED	HUNDER CA	LLED FROM	PLACE	FROR	NUMBER	CODE	HIK	VHORM
4 A		94:55:30am		FL	407-200					ΑĐ	3.6	.48
7 A		12:27:14#4		FL	407	· 61				AD	2.8	. 32
		43:13:3200		FL	447-					AD	5.0	. 6 9
		14:50:26pm		FL	407-1					AP	1.0	.10
14 4	UC 23.	. 44:18:03pa	SAMPORD	₽L.	407-33					AD	2.0	
SUBTO	DTAL	FOR 407-2	07-									3.74
OTAL	LON	G DISTANC	E CHARC	SES							;	14.96
	**	"Rate Codes (or Interstate	and Intra	state Long (Distance Call	\$					
	- 1	A = Automatic Identifica M = Multiple F	tion(ANI)	Customos D = Oay E = Eveni N = Night		Overseas F R = Standa T = Discour Y = Econom	rd C=	ervico C2 Calling C Person Station	ard [stom Fea F = Call F K = Confo	orward	
	č	r Whon this s	ymbol appo	ars In the l	olt margin, i	it Indicatos cr	odit has t	oon appl	iod and I	the toll ca	711	,
	A	- Whon this s		ars in the i	olt margin, l	t indicatos a	toll call ha	as beon t	pilled to ;	your acco	unt	

CONTINUED ON BACK OF THIS PAGE

DOCKET NO. 990994-TP WORLDCOM, INC.'S LATE-FILED EXHIBIT NO. 9

Late-filed Exhibit No. 9 consists of two sample bills, which are attached:

The first bill is a sample bill from New York, where WorldCom is providing local service to residential customers. The New York sample bill depicts charges for local, local toll, long distance, and calling card calls. WorldCom plans to slightly modify the New York sample bill to conform to Florida-specific rules when it provides local service to residential customers in Florida. Specifically, one difference is that New York is a full-toll denial state while Florida is a full-service denial state, and WorldCom plans to modify the bill to take that difference into consideration.

The second bill is a sample bill from Florida that depicts charges for local toll, and long distance service for a residential customer.

MCI WorldCom Account: 2F123456 Telephone Number: 305 555-1234 Customer Service: 🗳 www.mci.com/service	Statement Date: 16 Page 1 of 4 2 1 800 999-0280	0/03/00 MCIWORLDCOM.	All customer information and a 24hr 7 day a week toll free customer service number and web address is located on every page of the bill.
Summary of Charges Previous Charges	\$27.34 \$00.00 \$27.34 \$25.27	Online Account Manager Visit www.mci.com/service for immediate access to your MCI WorldCom account and customer service anytime!	Service Provider's logo clearly marked within the header on every page. The new corporate name changed November 1998.
Payment Due Date		<u>. </u>	Clear summary of total charges incurred, payment required, and date by which payment is due.
Statement Date: October 3, 2000 Payment Due Date: UPON RECEIPT Moving? Update E-mail? Check here and see reverse side.	MC The state of th	l WorldCom Account: 2f123456 ance Due: \$52.61	
	PAYABLE TO N Return MAIL TO:	DCOM RES SERVICE	Payment and mailing instructions.

 $402095\ 04260400020209043\ 990591369\ 00012957\ 00012957$

	100 W	
	MCI WorldCom Account: 2F123456 Statement Date: 10/03	
	Telephone Number: 305 555-1234 Page 2 of 4	MCI WORLDCOM
	Customer Service: www.mci.com/service 1 800 999-0280	
,	When to pay year hill Your payment must be received by the "PAYMENT DUE DATE" in order to be reflected on your next invoice. If we don't receive payment for the charges on this statement by the "PAYMENT DUE DATE", your account will become past due and subject to a late payment charge as applicable in your state.	
	How to pay year hill Mail your check and remittance stub in the return envelope or a standard envelope and return to: MCI WORLDCOM RES SERVICE P.O. Box 52252 Pheenix, AZ 85072-2252	
Information on how to correspond	Correspondence and Internet Access	
by mail and by the Internet.	Written Inquiries: MCI WorldCom, P.O. Box 4600, Iowa City, IA 52244-4600	
	Online Account Manager from MCI WorldCom: www.mci.com/service	
If a customer is past due they receive this message instead of a consumer education message.	Our records indicate a balance of \$27.34 remains from your previous invoice(s). If you have made full payment recently, please disregard this reminder. You are a valued MCIWorldCom customer, and we appreciate the opportunity to serve you.	
	E-MAIL? To receive information from MCI WorldCom about products and seaddress: MOVING? Simply provide your new address and telephone number below a MCI WorldCom account moves with you. If you currently don't have information, please provide the date you plan on moving.	ind we'll be sure your
	Check here if change of address only and complete information below) .
	YOUR NEW ADDRESS) -
	NameCurrent Pho	ne Number
	Address	
	CityState Zip New Phone MOVE DA	
٠.	W-12-1	
0	ENSURE YOUR MCI WORLDCOM SERVICES MOVE WITH YOU. CHECK THE Long distance and local toll (where available)	Long distance only
to on	I authorize MCI WorldCom to notify my local telephone company that I vindicated above from my old telephone number to the New Phone Numb I can only have one primary carrier for each of these services per telephone company may charge a small fee for this or any other change	vant to transfer my services as er(s) listed. I understand that none number, and my local
	SIGNATURE (Required) X DATE	

S-REGREQ34

DATE: OCTOBER 990994-TP)BER 9, 2000

ATTACHMENT PAGE 13 OF 28 28

MCI WorldCom Account: 2F123456

Statement Date: 10/03/00

Telephone Number:

O

305 555-1234

Page 3 of 4

Customer Service: 🖳 www.mci.com/service

2 1 800 999-0280

MCI WORLDCOM.

OZSTONICI OTTOTO			
			Charges broken down by service type.
Service Summary			<u> </u>
Local Toll Service Long Distance MCI 5c Everyday Plus Fee (09/03/00 - 10/02/00)	6.00 Earn an AmericaWest Flight 6.80 Faster! As a member of the 5.95 MCI/Flight Fund program you earn 5 miles for each dollar your spend on MCI WorldCom services (excluding taxes, credits and surcharges). For		
•	details call 1-877-MCI-FUND!	1	
Taxes and Surcharges	\$6.52	\	
Current Charges	\$25.27	$ \setminus $	
Local Toll Service		$\perp \downarrow$	Each section lists where calls originated
FOCEL TON GOLLICO		1 \	and are sorted by that number.
Calls from 305 555-1234:		1 \	
Date Time Place Number Rate Min /	mount With MCI WorldCom, you		\ <u></u>
Sep 10 11:27P Red Wing, FL 305 111-2222 Ofpk 20	2.00 are also getting great		Product messages describing services the
Sep 16 3:20P Red Wing, FL 305 444-4444 Peak 35	3.00 rates on all of your local	1 /	customer is receiving.
Sep 21 3.30P Red Wing, FL 305 111-2222 Peak 15	1.00 toll calls.	1 /	
Total Calls from 305 555-1234	\$0.00 <u> </u>	/	
Total Local Toll Service	\$6.00	/	
Total Local 104 Service	4000	/	
		1/	
Long Distance		1/	
2019		//	
Calls from 305 555-1234:		1	
Date Time Place Number Rate Min		/	•
Sep 3 10:00A Washington, DC 202 222-2222 Peak 30		'	
Sep 5 8:58P Grnts Pass, OR 503 444-3333 5cent 22	1,10 Now you can save with		
Sep 10 11:15P Seattle, WA 206 333-3333 5cent 42	2,10 MCI WorldCom's new low .90 5 cents per minute rate on		
Sep 20 9:45P Washington, DC 202 666-6666 5cent 18			
Total Calls from 305 555-1234	from home every evening		
Total I film Dietance	\$6.80 and all weekend long!		
Total Long Distance	Antha mu menting total.		
10			

Invoice Continues

on Reverse ...

MCI WorldCom Account: 2F123456 Statement Date: 10/03/00

Telephone Number:

Customer Service: www.mci.com/service

305 555-1234

Page 4 of 4

1 800 999-0280

Taxes and Surcharges

Long Distance Service

Federal Excise Tax	.86
State and Local Taxes	1.43
Federal, State, and Local Surcharges	3.17
Federal Universal Service Fee	1.06

Total Taxes and Surcharges

\$6.52

Key to Rate Codes:

Ofok = Call Priced at Off-Peak Rate Peak = Call Priced at Peak Rate

5cent = 5 cent Rate

For Your Information ...

ENSURE YOU KEEP YOUR MCI WorldComSM BENEFITS! Simply call your local phone company today and request that your local toll and long distance service not be switched to another company without your verbal or written authorization.

MCI WorldCom local toll service has been added to one or more of the following telephone numbers. Please see below for all current services on your account.

For (305) 555-1234, MCI WorldCom is your carrier for: Local Toll and Long Distance.

Important messages about MCI WorldCom services, telecom industry information, and product offerings began running here in late 1998.

Federal Universal Service Fee appeared in July 1998 for Residential customers.

Legend Reference explaining

rate keys and special call marks.

Truth in Billing New Service Provider message began 8/2/00. This long distance customer just added MCI WorldCom for local toll service.

The Anti-Slamming PIC'd list of services message runs every month and began appearing in June 1999.

> End of Invoice. Thank You for Choosing MCI WorldCom.

NiCl WorldCom Account: 2F123456 Statement Date: 10/03/00 All customer information and a 24hr. - 7 Telephone Number: 718 555-1234 Page 1 of 5 MCI WORLDCOM day a week toll free customer service Customer Service: www.mci.com/service 1 800 999-0280 number and web address is located on every page of the bill. Service Provider's logo clearly marked within the header on every page. The new **Summary of Charges** corporate name changed November 1998. Previous Charges..... \$57.34 Online Account Manager Payments through 10/02/00..... \$57.34 Cr Balance Forward..... \$0.00 Visit www.mci.com/service for immediate access to your Current Charges..... \$58,87 MCI WorldCom account and customer service anytime! Total Amount Due..... \$58.87 Payment Due Date..... 10/24/00 Clear summary of total charges incurred, payment required, and date by which payment is due. PLEASE FOLD BELOW AND DETACH. RETURN ONLY THE LOWER PORTION. Statement Date: October 3, 2000 MCI WorldCom Account: 2F123456 Payment Due Date: October 24, 2000 Balance Due: \$58.87 Indicate amount paid

Mandahalladhallall #BWNBMMR *****153-005-151 1 #88888888UR000002# 349 *CT20*75*01** SAMPLE CUSTOMER RT BOX 634 **€LUSHING, NY** 11375-2728 C1

œ

Please make check or money order PAYABLE TO MCI WORLDCOM. DO NOT SEND CASH. Return this form with your payment. MAIL TO:

Marchaellandalahibladasahidak

MCI WORLDCOM RES SERVICE PO BOX 52251 PHOENIX, AZ 85072-2251

402095 04260400020209043 990591369 00012957 00012957

LOCREGIZ

Payment and mailing instructions.

MCI WorldCom Account: 2F123456 Statement Date: 10/03/00 Telephone Number: 718 555-1234 Page 2 of 5 **1** 800 999-0280 Customer Service: www.mci.com/service Identify local provider for customers When to pay your bill Questions about your bill with local service. Your payment must be received by the "PAYMENT DUE DATE" in order to be Your local service provider is MCImetro Access Transmission reflected on your next invoice. If we don't receive payment for the charges on Services, LLC. If you have any questions about your bill, please call your Service Representative at the number shown above. this statement by the "PAYMENT DUE DATE", your account will become past due and subject to a late payment charge as applicable in your state. How to pay your bill Mail your check and remittance stub in the return envelope or a standard envelope and return to: MCI WORLDOOM RES SERVICE P.O. Box 52251 Phoenix, AZ 86072-2251 Correspondence and Internet Access information on how to correspond Written Inquiries: MCI WorldCom, P.O. Box 4600, Iowa City, IA 52244-4600 by mail and by the internet Online Account Manager from MCI WorldCom: www.mci.com/service Changes to your account - Moving? If you're moving or need to make changes to your account, please call the Customer Service number shown above. A Customer Service Professional will be happy to assist you. "Countdown to Smart Dialing" contains ten of the most important dialing tips that consumers must know when they pick up the phone. It includes Consumer education message. cost cutting hints, tools to fight phone scams and a handy cut-out Smart Dialing Guide. "Countdown" was just released by Call for Action, a Washington, DC-based consumer advocacy group and MCI WorldCom. You can get your free copy by sending a self addressed stamped envelope to Call for Action, 5272 River Rd., Bethesda, MD 20816 or visit MCI WorldCom's website at http://www.mciworld.com and search for Countdown.

@LOCREGIA

MCI WorldCom Account: 2F123456 Statement Date: 10/03/00 MCIWORLDCOM. Page 3 of 5 Telephone Number: 718 555-1234 Customer Service: www.mci.com/service **2** 1 800 999-0280 Charges broken down by service type. **Local Service Summary** Service for 718 555-1234 MCI WorldCom Local Savings 100 (10/03/00 - 11/02/00)....... 14.99 Earn an AmericaWest Flight Call Waiting (10/03/00 - 11/02/00)..... 4.93 Faster! As a member of the \$19.92 MCI/Flight Fund program you Long Distance Summary earn 5 miles for each dollar you spend on MCI WorldCom 6.00 Local Toll Service..... services (excluding taxes. Long Distance..... 6.80 credits and surcharges). For MCI WorldCom Card..... 6.96 details call 1-877-MCI FUND! MCI 5c Everyday Plus Fee (09/03/00 - 10/02/00)..... 5.95 \$25.71 Taxes and Surcharges..... \$13.24 **Current Charges** \$58.87 **Local Calls** (09/03/00 - 10/02/00) Calls from 718 555-1234: Calls _Minutes Rate Amount Summary of Local Calls made. **Local Calls Made** Calls Included with Plan Total Calls from 718 555-1234 \$0.00 **Local Toll Service** Each toll section lists where calls originated and are sorted by that number. Calls from 718 555-1234: Date Time Place Number Rate Min Amount With MCI WorldCom, you Sep 10 11:27P Red Wing, NY 516 111-2222 20 2.00 Ofbk are also getting great Product messages describing service Sep 16 3:20P Red Wing, NY 516 444-4444 Peak 35 3.00 rates on all of your local customer is receiving. 516 111-2222 Sep 21 3.30P Red Wing, NY Peak 15 1.00 toll calls. Total Calls from 718 555-1234 \$6.00 **Total Local Toll Service** \$6.00

Invoice Continues

on Reverse ...

MCI WorldCom Account: 2F123456 Statement Date: 10/03/00

Telephone Number: 718 555-1234 Page 4 of 5

Customer Service: 💂 www.mci.com/service 🖀 1 800 999-0280



Long Distance

Calls To	om / 18 5:	55-12 <i>3</i> 4:				
Date	Time	Place	Number	Rate	Min_	Amount
Sep 3	10:00A	Washington, DC	202 222-2222	Peak	30	2.70
		Grnts Pass, OR		5cent	22	1.10
		Seattle, WA		5cent		2.10
		Washington, DC		5cent	18	.90
		718 555-1234	:			\$6.80

Total Long Distance

\$6.80

MCI 5c Everyday Plus

Now you can save with MCI WorldCom's new low 5 cents per minute rate on all your state-to-state calls from home every evening and all weekend long!

MCI WorldCom Card

MCI WorldCom Card Calls for 7185551234:

00P Weston, CT					
OUT TRESION, CI	203 454-8888	24 Hr	3	3.02	P
rom Newark, NJ	973 986-4789				
07P Lexington, KY	606 255-1234	24 Hr	5	3.94	•
orldCom Card Calls	for 7185551234			\$6.96	
1	trom Cincinnati, O	07P Lexington, KY 606 255-1234	07P Lexington, KY 606 255-1234 24 Hr tom Cincinnati, OH 513 777-4300	07P Lexington, KY 606 255-1234 24 Hr 5	07P Lexington, KY 606 255-1234 24 Hr 5 3.94 from Cincinnati, OH 513 777-4300

Total MCI WorldCom Card

\$6.96

Taxes and Surcharges

Separate Taxes and Surcharge breakout for Local and non-Local service.

Federal Universal Service Fee appeared in July 1998 for Residential customers.

t i

- Local Service	
Local Number Portability	.23
Network Access Surcharge- Primary line	4.35
Federal Excise Tax	.91
State & Local Taxes	1.07
Long Distance Service	
Federal Excise Tax	.86
State and Local Taxes	1.43
Federal, State, and Local Surcharges	3.17
Federal Universal Service Fee	1.22

Total Taxes and Surcharges

\$13.24

MCI WorldCom Account: 2F123456 Statement Date: 10/03/00

Telephone Number: 718 555-1234 Page 5 of 5

Customer Service: Www.mci.com/service 1800 999-0280

MCIWORLDCOM

Key to Rate Codes:

Ofpk = Call Priced at Off-Peak Rate

Peak = Call Priced at Peak Rate

5cent = 5 cent Rate

= Call Made from Payphone

24 Hr = Call Priced at 24-Hour Rate

For Your Information ...

ENSURE YOU KEEP YOUR MCI WorldComSM BENEFITS!

Simply call your local phone company today and request that your local toll and long distance service not be switched to another company without your verbal or written authorization.

For (718) 555-1234, MCI WorldCom is your new carrier for: Local Toll Service

MCI WorldCom offers a variety of payment options to help pay your bill on time every month. To learn more about these options, call 1-800-410-8708. Failure to pay your MCI WorldCom charges could result in a loss of access to MCI WorldCom's great products. It could also lead to the involvement of a collections agency. Your dial tone will not be affected by failure to pay any non-local telecommunications charges.

End of Invoice.
Thank You for Choosing MCI WorldCom.

Legend Reference explaining rate keys and special call marks.

Important messages about MCI WorldCom services, telecom industry information, and product offerings began running here in late 1998.

Truth in Billing New Service Provider message began 8/2/00. This long distance customer just added MC! WorldCom for local toll service.

This message for deniable and non-deniable clarification began running on our integrated invoices in non-FSD states in June 2000.

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Your AT&T Statement-(2a July 1, 2000

#BWNCJFM #33050000051011# C 584AT10.254B5A21138***3DGT JOHN M SMITH 125 MAIN STREET ROCKPORT TX 78382



Customer # 1234 5678 9012 3456 Page 1 of 5



Customer Service: 1 800 662-3036 Text Phone (TTY): 1 800 833-3232

Summary of charges	
Previous balance	
Payment received - Thank you	
AT&T Local Services	
AT&T Long Distance Services	
Total amount due	\$^^^^
Date due	July 26, 2000



Extra! Extra!

Welcome to your AT&T Local and Long Distance bill. It's filled with information you can use to get the most out of your service. Continued -

Detach and return with payment

Please write your account number on your check or money order made payable to AT&T. Do not send cash. Do not staple this portion to your payment. Thank you.

lotal amount que						
Date due	The second section is	THE RELEASE VALUE OF	July	26,	2000	
		-				
Amount enclosed	: s					

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AT&T			
PO BOX 4007			
WHITTIER CA 90607-4007			

Continues on back \$



JOHN M SMITH Jul 1, 2000

Customer # 1234 5678 9012 3456 C

Moving? Check the box and print new address on back.

> Customer Service: 1 800 662-3036 Text Phone (TTY): 1 800 833-3232

Jul 1, 2000 Customer # 1234 5678 9012 3456 Page 2 of 5



Extra! Extra!

Welcome to your AT&T Local and Long Distance bill. Your AT&T bill gives you the latest updates on AT&T products and services, so you can make the most informed choices for all your communication needs. It presents your calling information simply and concisely, and offers several easy payment options. If you wish, you can have your bill paid automatically via credit card or checking account. Or, you can request the AT&T Inter@ctive Bill at http://www.att.com/clickebill With your new AT&T bill, the choice is yours.

Please let us know

E-mail address

New address? Has anything changed? Please check the box on the front of this page and print below.

Name Address City, State, Zip Home phone

Don't move without AT&T. When you change addresses, call 1 800 9 GET ATT (1800 943-8288) to get AT&T quality and service in your new home.

034

Customer Service: 1 800 662-3036 2b
Text Phone (TTY): 1 800 833-3232

Jul 1, 2000 Customer # 1234 5678 9012 3456 Page 3 of 5



AT&T Local Services

Jun 2 - Jul 1, 2000

Charges for 214 555-6712:

Basic service and calls

Other local calls

Custom calling features

Installation and repairs

Taxes and surcharges

Total AT&T Local Services

Basic service and calls

For 214 555-6712

Date Description Amount ^ Jul 2-Aug 1 AT&T local + 3 features Caller ID Call waiting 3-way calling ^^^ Jul 2-Aug 1 Local number portability service charge ^ Jul 2-Aug 1 FCC line charge SAAAAAAA

Other local calls

For 214 555-6712

Per-use calls

Operator assisted calls

	Date	Where	Time	Amount
5	Jun 25	Via Relay,CA	8:00pm	^^^
				\$^^^^
To	tal other loca	calls		\$^^^^

Custom calling features

For 214 555-6712

	Date	Description	Amount
6	Jul 2-Aug 1	Call forwarding	 ^^^
-			 \$^^^^

Installation and repairs

	Date	Description	Amount
7	Jun 5	Install new jack	^^^^
		. *	\$^^^^



Customer Service: 1 800 662-3036 Text Phone (TTY): 1 800 833-3232



Jul 1, 2000 Customer # 1234 5678 9012 3456 Page 4 of 5

Description	Amount
Federal tax	^^^
9-1-1 surcharge	^^^
TX Infrastruct. Fund Reimb.	^^^
Local tax	^^^
State tax	^^^
Texas Universal Service	^^^
Texas Poison Control Surcharge	^^^
TX 9-1-1 surcharge	^^^
	\$^^^^

Important information about your local telephone service

Federal regulation requires AT&T to inform our valued customers that local service may be disconnected in the event of the failure to pay the local charges. However, to avoid collection activity, please remember to pay all charges by the due date.

You may notice a new or revised municipal fee on your telephone bill this month. This charge was developed using a formula provided by your municipality, with information supplied by your local telephone company. For more information on this fee, please contact your city officials.

If you believe that a Telecommunications Carrier has switched you, or included unauthorized charges on your bill, you may contact: Public Utility Commission of Texas, Office of Customer Protection, PO Box 13326, Austin, Texas 78711-3326, 512 936-7120 or in Texas (toll-free) 1 888 782-8477, fax 512 936-7003, e-mail address: customer@puc.state.tx.us Hearing and speech-impaired individuals with text telephones (TTY) may contact the Commission at 512 936-7136.

Customer Service: 1 800 662-3036 Text Phone (TTY): 1 800 833-3232

Jul 1, 2000 Customer # 1234 5678 9012 3456 Page 5 of 5



AT&T Long Distance Services

Jun 2 - Jul 1, 2000
Charges for 214 555-6712:
AT&T One Rate® Plus Plan calls
National access contribution
Taxes and surcharges
Total AT&T Long Distance Services

Description Amount AT&T One Rate® Plus Plan monthly fee Jul 2 - Aug 1, 2000 Direct dialed calls

Direct dialed calls

	Date	Number called	Where	Time	Rate	Туре	Min	Amount
8	Jun 6	312 555-1234	San Rafael,IL	8:00am	day	direct	~~	^
9	Jun 7	617 555-2030	Lubbock,TX	9:35pm	eve	direct	^^	^
							AAAA	\$^^^^

For an explanation of these charges, please call 1 800 532-2021.

Taxes and surcharges	
Description	Amount
Federal tax	^^^
TX Infrastruct. Fund Reimb.	^^^
Local tax	*******
State tax	^^^
Texas Universal Service	^^^^
	\$^^^^

Your selected service providers

Telephone No.	Service	Provider	As of Date
214 555-6712	Local	AT&T	Jul 1, 2000
	Local toll	AT&T	Jul 1, 2000
	Long distance	AT&T	Jul 1, 2000

Your AT&T Statement - (24)

July 20 - August 19, 2000

#BWNCJFM

330500000510114-353 C 1 FN .320***** 000004-000016 JOHN M SMITH 125 MAIN STREET BROOKSVILLE FL 34601-6850



Customer # 352 555-1999 Page 1 of 4

Customer Service:	1	800	222-0300
Text Phone (TTY):		800	833-3232

Summary of charges	
Previous balance	
Payment received Aug 14 - Thank you	· ^^~~
AT&T One Rate® Plan calls	
AT&T One Rate® International Plan calls.	
National access contribution	
Taxes and surcharges	
Total amount due	\$^^^^
Date due	September 13, 2000
What you saved	
Your overall AT&T savings	
This month you saved	\$^^^^

Over the last 3 months you saved \$^^^^^^

-1	
114	Ext
Show.	Line

ra! Extra!

Welcome to your AT&T bill. It's filled with valuable information you can use to get the most out of your service. Continued >

Detach and return with payment

Savings are compared to AT&T standard rates.

Please write your account number on your check or money order made payable to AT&T. Do not send cash. Do not staple this portion to your payment. Thank you.

Total amount due		-	\$^	^^^	
Date due		S	September	13,	2000
Ame	nt enclosed: \$	Γ			

He AT&T PO BOX 8212 AURURA IL 60572-8212

Continues on back \$



JOHN M SMITH Jul 20-Aug 19, 2000

Customer # 352 555-1999 D

Moving? Check the box and
print new address on back.

CAAAAAAA

Solely for authorized persons having a need to know pursuant to Company instructions.(FLPUC.p65) AT&T Proprietary - RESTRICTED

Jul 20 - Aug 19, 2000 Customer # 352 555-1999 Page 2 of 4

TOWNS THE TANK

C. Mark

Customer Service: 1 800 222-0300 Text Phone (TTY): 1 800 833-3232

Extra! Extra!

Welcome to your AT&T Long Distance bill.

Your AT&T bill gives you the latest updates on AT&T products and services. so you can make the most informed choices for all your communications needs. It presents your calling information simply and concisely, and offers several easy payment options. If you wish, you can have your bill paid automatically via credit card or checking account. Or, you can request the AT&T Inter@ctive Bill at http://www.att.com/clickebill. With your new AT&T bill, the choice is yours.

Please let us know

New address? Has anything changed? Please check the box on the front of this page and print below.

Name Address City, State, Zip Home phone E-mail address Don't move without AT&T. When you change addresses, call 1 800 MOVE-ATT®, ext. 83767 to get AT&T quality and service in your new home.

Recycled paper

Solely for authorized persons having a need to know pursuant to Company instructions. (FLPUC.p65)

AT&T Proprietary - RESTRICTED

Customer Service: 1 800 222-0300 Text Phone (TTY): 1 800 833-3232

Jul 20 - Aug 19, 2000 Customer # 352 555-1999 Page 3 of 4



Description	Amoun
Direct dialed calls	^^^^
Calling card calls	^^^

With AT&T One Flate® you enjoy making all your domestic direct dialed calls from home for one low rate.

Direct dialed calls

DOCKET NO. 990994-TP

DATE: OCTOBER 9, 2000

	Date		Num	ber called	Where	Time	Rate	Type	Min	Amount
1	Jul	25	727	555-1234	Stpetersbrg,FL	8:00am	day	direct	34	^
2	Jul	26	619	555-8520	La Jolla,CA	6:20am	night	direct	78	^
3	Jul	27	617	555-2030	Boston,MA	9:35pm	eve	direct	81	^
4	Aug	10	908	555-5874	Peapack,NJ	8:18pm	eve	direct	58	^
5	Aug	12	727	555-1234	Stpetersbrg,FL	9:35am	day	direct	38	^
6	Aug	13	401	555-4500	Newport,RI	8:18pm	eve	direct	58	^
									347 5	****

AT&T calling card calls

Card number: 891 253 1234

	Date		Number called	Where	Time	Rate	Туре	Min	Amount
7	Jul	28	312 555-1234	San Rafael,IL	8:00pm	day	station	1	^
	Calle	d from	401 555-4500	Newport, RI					
-								4.4	

AT&T One Rate International Plan calls		
Description	Minutes	Amount
AT&T One Rate® International Plan		^
monthly fee Aug 19 - Sep 19, 2000		
International calls after savings	17	~~~~

With AT&T One Rate® International you pay one low rate to each country you call from home anytime, day or night.

Total AT&T One Rate®International Plan calls after savings \$^^^^^^^

This month you saved \$^^^^^ with AT&T One Rate®International Plan.

International calls

Direct dialed calls

	Date	•	Number called	Where	Time	Rate	Туре	Min	after savings
8	Jul	24	331488589612345	France	12:00pm	econ	direct	3	^
9	Jui	28	0962665784112345	Jordan	2:22am	econ	direct	14	^
-								400.4	

> Customer Service: 1 800 222-0300 Text Phone (TTY): 1 800 833-3232

Jul 20 - Aug 19, 2000 Customer # 352 555-1999 Page 4 of 4

SAAAAAAA

National access contribution			
Date	Description	Amount	
10	Universal connectivity charge	^~~~~	

For an explanation of these charges, please call 1 800 532-2021.

Taxes and surcharges	
Description	Amount
Federal tax	^^^
Florida Gross Receipts Tax Surcharge	^^^
Local tax	^^^^
Florida Intrastate Gross Receipts Surcharge	
	\$^^^^

Important information about your telephone service

From time to time, we develop new offers and make pricing changes that you may want to know more about. We've set up a special web site to help you get the most out of your AT&T services--please visit us online at http://www.att.com/home