

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JEFFERY C. COX)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2009-00460
BELLSOUTH TELECOMMUNICATIONS, INC.)	
D/B/A AT&T KENTUCKY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST INFORMATION REQUEST
TO BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before May 31, 2011. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath, or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

AT&T Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T Kentucky fails or refuses to furnish all or part of the requested information, AT&T Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. If the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

The following highlighted items reference confidential material contained in the record for this case. Responses should be provided in accordance with the Commission's procedures for filing of confidential material.

1. Describe in detail and provide any and all available documentation that fully explains the terms and conditions associated with the "Bundle 77" discount package.

- a. Include any and all scripts or other documentation used or made available to customer service personnel for the purpose of explaining the "Bundle 77" discount package to prospective subscribers.

b. Include any and all promotional material supplied to prospective subscribers both online and in paper form describing the "Bundle 77" discount package.

2. Explain how and when the discounts associated with the "Bundle 77" discount package were applied to the Complainant's bill. Include a thorough explanation of how and when billing credits and/or bill adjustments are made for any discounts associated with the "Bundle 77" discount package.

3. Refer to Exhibit 1 of Joan Duncan's Affidavit attached to AT&T Kentucky's Answer and Motion to Dismiss "Joan Duncan's Affidavit." For the bill rendered on 9/19/2008 (apparently the first billing period following adoption of the "Bundle 77" discount package which is the source of the dispute), the total amount due is \$ _____ including a \$ _____ adjustment (added on to the bill) that occurred on 9/2/2008 identified as "Account Balance Adjustment" but not otherwise explained and not addressed by AT&T Kentucky in its response.

a. Explain the purpose of the \$ _____ adjustment.

b. Explain and provide any available documentation for the "Complete Choice 2 Line Disc" amount billed credit of \$ _____. Include the applicable tariff sheet(s) or other pricing reference that justifies the discounted rate applied to the Complainant's bills.

c. When and where are discounts applied for the "package plan" mentioned under "AT&T Benefits" at the first page of the bill rendered on 9/19/2008?

4. Refer to Exhibit 1 of Joan Duncan's Affidavit. For the bill rendered on 10/19/2008, the total amount due is \$ _____ including a \$ _____ credit adjustment that occurred on 9/22/2008 identified as "Account Balance Adjustment" but otherwise unexplained and not addressed by AT&T Kentucky in its response.

a. Explain the purpose of the \$ _____ credit adjustment.

b. When and where are discounts applied for the "package plan" mentioned under "AT&T Benefits" at the first page of the bill rendered on 10/19/2008?

5. Refer to Exhibit 1 of Joan Duncan's Affidavit. For the bill rendered on 11/19/2008 ("FINAL BILL"), the total amount due is \$ _____ including a \$ _____ credit adjustment attributed to Wireless Services but otherwise unexplained.

a. Explain the purpose of the \$ _____ credit adjustment.

b. Explain and provide any available documentation for the "Complete Choice 2 Line Disc" amount billed of \$ _____. Include the applicable tariff sheet(s) or other pricing reference that justifies the rate applied to the Complainant's bills.

c. Explain why there are no discounts for the "package plan" mentioned under "AT&T Benefits" for bills rendered for the two previous billing periods.

6. Refer to Exhibit 1 of Joan Duncan's Affidavit. For the bill rendered on 12/19/2008 ("REVISED FINAL BILL"), the total amount due is \$ _____ with no

adjustments but includes "charges not previously billed" with a credit adjustment of \$ [redacted] for "AT&T Long Distance Service." Explain why there are no discounts for the "package plan" mentioned under "AT&T Benefits" for bills rendered for the previous billing periods of 9/19/2008 and 10/19/2008.

7. Refer to Exhibit 2 of Joan Duncan's Affidavit. For the bill rendered on 2/19/2009 ("REVISED FINAL BILL"), the total amount due is \$ [redacted] including a \$ [redacted] credit adjustment attributed to "Outside Collection Agency."

a. Describe and fully explain the services for which the Complainant is being billed.

b. Explain the purpose of the credit adjustment for "Outside Collection Agency" and whether or not this adjustment includes any amounts that were later credited to the account of the Complainant as reflected in the record for this proceeding.

8. Refer to Exhibit 3 of Joan Duncan's Affidavit. According to AT&T Kentucky's calculations for the subject period in dispute, payments totaling \$ [redacted] were received from the Complainant for corresponding "Current Charges" totaling \$ [redacted]. The difference between the payments received and the "Current Charges" results in an apparent credit balance of \$ [redacted]. However, Exhibit 3 does not reflect the credits of \$ [redacted] on December 10, 2009, and \$ [redacted] on December 18, 2009 identified at page 4, paragraph 11, of Joan Duncan's Affidavit or the additional credit of \$ [redacted] issued in July 2010 during this proceeding.

a. Explain the apparent discrepancies between the "Current Charges" billed and the "Total Amounts Due" as listed in Exhibit 3.

b. Fully explain how the apparent credit balance of \$_____ for payments received, along with subsequent credit adjustments of \$_____ and \$_____, totaling \$_____, relates to the \$_____ referred to "Outside Collection Agency" with the bill rendered on 2/19/2009. Was the amount referred for outside collection an error?

c. Explain why the past due balance of \$_____ for the Complainant's final wireless bill was not included in Exhibit 3. Are collection efforts ongoing for all or any portion of this balance?

d. Provide a revised table for the one provided in Exhibit 3 that "fully reflects all payments and credits posted to the Complainant's account" and accurately and completely lists any and all amounts currently owed for any and all of the Complainant's accounts (whether combined or billed separately) that are related to the disputed billings for the "Bundle 77" discount package. Make sure that all credits, refunds and adjustments are reflected, including any amounts that were referred for collection or otherwise remain collectible from the Complainant.

9. Refer to Exhibits 4 and 5 of Joan Duncan's Affidavit. The Subscriber detail records ("CARE" subscriber transaction logs) indicate that the Complainant was mailed a "Customer Service Summary" on 8/30/2008 for wireless service. Provide any evidence of any similar documentation indicating that the Complainant was supplied information that verifies the pricing criteria

applicable to the Complainant's service arrangement for the "Bundle 77" discount package that is the subject of the complaint.

10. Refer to page 3, paragraph 9, of Joan Duncan's Affidavit. The "Bundle 77" discount package arrangement is generally described but there is no pricing criteria provided specific to the Complainant's service arrangement under the "Bundle 77" discount package. Describe and provide any available documentation that accurately indicates the specific pricing of the "Bundle 77" service arrangement applicable to the Complainant (i.e. specific amounts/percentages of discount to be applied for each of the Complainant's service components).

11. Refer to Attachment B, AT&T Residential Service Agreement, of AT&T Kentucky's Answer and Motion to Dismiss. Provide evidence of the Complainant's execution of this agreement.

12. Does AT&T Kentucky agree that it has an obligation to accurately bill for services provided to subscribers?

13. Is a bill considered accurate if it fails to include appropriate discounts? Explain.

14. Were the bills rendered to the Complainant for the "Bundle 77" package discount consistent with those rendered to other subscribers of the "Bundle 77" discount package?

a. If no, explain how and why the Complainant's bills are different.

b. If yes, describe and provide any available documentation indicating whether or not other Kentucky subscribers have consistently disputed bills for the "Bundle 77" discount package?



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DATED: MAY 16 2011

cc: Parties of Record

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