

Feb. 8, 2007  
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Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

RECEIVED

FEB 09 2007

PUBLIC SERVICE  
COMMISSION

Re: Ronald B. Blackburn, Complainant v. BellSouth Telecommunications, Inc.  
D/B/A AT&T Kentucky, Defendant  
PSC 2007-00027

Dear Ms. O'Donnell:

Enclosed for filing is my RESPONSE to the earlier filing of the ANSWER by Cheryl R. Winn.

Please note that Ms. Winn's cover letter to you, of February 5, 2007, appears to erroneously contain the case number "PSC 2006-00027". This may have contributed to your Ms. Amy Daugherty being unable to determine who on your staff handles this case, when I called her today on Feb. 8, 2007.

Sincerely,

  
Ronald B. Blackburn

Enclosure: Three page RESPONSE, dated Feb. 8, 2007.

Cc: Cheryl R. Winn

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RONALD B. BLACKBURN	)	
	)	
COMPLAINANT	)	
	)	
v.	)	CASE NO.
	)	2007-00027
BELLSOUTH TELECOMMUNICATIONS, INC.	)	
D/B/A AT&T KENTUCKY	)	
	)	
DEFENDANT	)	

**RESPONSE OF RONALD B. BLACKBURN (COMPLAINANT)**  
**Feb. 8, 2007 (3 pages)**

Ronald B. Blackburn, Complainant, responds to the ANSWER (presented Feb. 5, 2007, but undated otherwise) of Bellsouth (hereinafter referred to as BATT) as follows:

**RESPONSE 1**

The ANSWER did not address the questionable and inappropriate terminology of “bundled services” as cited in the original complaint. Telecons with BATT reps on 12/8/06, 12/13/06, and 12/14/06 contained their repeated use of the term “bundled services” discount in spite of complainant’s insistence that the issue involved “combined bill discount”. BATT reps Chris Getz, Kay Coleman, and Rhonda Griffin should be able to confirm this factual recall. A very reasonable and common interpretation of the term “combined bill discount” should be that it is a discount provided because the Cingular wireless bill was combined with the Bellsouth residential line bill, especially since the two companies had not yet been integrated under AT&T at that time. Since it is an obvious cost advantage for BATT, to a greater extent than to the consumer, it is only fair and reasonable to expect that such a cost advantage be passed on to the consumer because there is no added equipment, capitalization costs, etc.

## **RESPONSE 2**

The ANSWER cited only the “Combined Bill Reward” filed with and accepted by the Kentucky Public Service Commission on Jan. 14, 2004. Information regarding the “Combined Bill Reward”, specifically regarding conditions of a 10% discount, have not been made available to the average consumer, such as could have been done in Bellsouth’s “Your guide to the Bellsouth Complete Choice plan” of 4/2005. The term “Combined Bill Reward” has only been seen or heard by the complainant in the recent ANSWER.

## **RESPONSE 3**

The BATT service representative Reginald Miller, on Dec. 8, 2006, did not initially inform Blackburn (Complainant) about losing the \$3 discount when Blackburn requested two calling features (Call Waiting Deluxe and Caller ID Name and Number Delivery with Anonymous Call Rejection \* ) be removed. Blackburn specifically asked if there would be any effect on the bill other than removal of \$16.50 being charged (and subsequently credited) for the two features on the bill. It was only when Blackburn specifically mentioned the “combined bill discount” on the Cingular bill that the rep finally stated that the 10% discount on the Cingular bill would be removed.

\* Note: The ANSWER used the term “Caller ID Deluxe” when, in fact, the billing statement calls it “Caller ID Name and Number Delivery with Anonymous Call Rejection”.

## **RESPONSE 4**

The \$43.34 account adjustment mentioned in the lower paragraph of page 3 of the ANSWER has absolutely nothing to do with the nature of the subject complaint. That adjustment was made only as a result of BATT discontinuing the two calling features prematurely on Dec. 11, 2006, instead of the requested Dec. 16, 2006 date. This fact can be verified by BATT rep Chris Getz, who initially made the \$43.34 adjustment. Mention of this account adjustment in the ANSWER has the appearance of an attempt to unfairly influence the ruling of PSC in this matter.

**RESPONSE 5**

On or about Jan. 30, 2007, a Cingular rep (Amy Allen) notified Blackburn that a \$3 per month credit could be made to his billing, through December 2007. The Complainant (Blackburn) accepted the offer, but only as an interim resolution to the subject complaint. Amy Allen understood and acknowledged this conditional acceptance. The complainant then contacted Joan Duncan of BATT in Louisville, on or about Feb. 1, 2007, and notified her of the arrangement between Blackburn and Allen. Complainant still demands continuation of the \$3 discount as long as both the subject residential line and wireless phone services are held simultaneously by the Complainant.