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February 1, 2008

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FEB 01 2008

PUBLIC SERVICE
COMMISSION

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

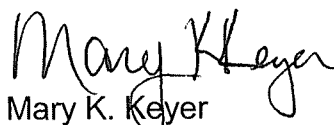
Re: Petition of the Kentucky Commission on the Deaf and Hard of Hearing
To Expand the Funding Base for the Kentucky Telecommunications
Access Program (TAP)
PSC 2007-00464

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of Comments of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky and New Cingular Wireless PCS, LLC, and Cincinnati SMSA Limited Partnership d/b/a AT&T Mobility f/k/a Cingular wireless.

Thank you for your attention to this matter.

Sincerely,


Mary K. Keyer
General Counsel-KY

cc: Parties of Record

Enclosures

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COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

FEB 01 2008

PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF THE KENTUCKY COMMISSION)
ON THE DEAF AND HARD OF HEARING TO)
EXPAND THE FUNDING BASE FOR THE)
KENTUCKY TELECOMMUNICATIONS ACCESS)
PROGRAM (TAP))

Case No. 2007-00464

COMMENTS OF BELLSOUTH TELECOMMUNICATIONS, INC., D/B/A AT&T KENTUCKY AND NEW CINGULAR WIRELESS PCS, LLC, AND CINCINNATI SMSA LIMITED PARTNERSHIP D/B/A AT&T MOBILITY F/K/A CINGULAR WIRELESS

BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky (“AT&T Kentucky”), and New Cingular Wireless PCS, LLC, and Cincinnati SMSA Limited Partnership d/b/a AT&T Mobility f/k/a Cingular Wireless (“AT&T Mobility”) (collectively, “AT&T”), by counsel, files the following comments pursuant to the Kentucky Public Service Commission’s (“Commission”) Order dated December 5, 2007, in this docket.

INTRODUCTION

On October 26, 2007, the Kentucky Commission on the Deaf and Hard of Hearing (“KCDHH”) filed a petition with the Commission requesting a review of the current funding mechanisms for the Telecommunications Relay Service (“TRS”) and the Telecommunications Access Program (“TAP”) surcharges. Presently, incumbent local exchange carriers (“ILECs”) and competitive local exchange carriers (“CLECs”) within the Commission’s jurisdiction are required to collect both surcharges from their retail customers and remit to the Commission the surcharge collections on either a monthly or quarterly basis depending on the number of customers served by each carrier. The

carriers are also required to denote these surcharges as a separate line item on the customers' monthly bills.

In its Petition, KCDHH has requested that the Commission order wireless telecommunications providers to begin collecting the surcharges from their customers in the same manner as wireline providers and that this begin by July 1, 2008.

DISCUSSION

AT&T is not only a local exchange carrier in Kentucky, but is also a commercial mobile radio service ("CMRS") provider, and has affiliate companies that provide interexchange carrier services and other services in this Commonwealth. As such, AT&T is very supportive of the Kentucky TRS and TAP programs, and is generally not opposed to KCDHH's Petition. In fact, AT&T believes that all telecommunications providers should support these programs on an equitable basis that is competitively and technologically non-discriminatory.

The current TRS surcharge rate is \$0.07 per access line per month, and the current TAP surcharge rate is \$0.02¹ per access line per month, for a combined TRS/TAP monthly surcharge of \$0.09 per access line per month. Requiring wireless carriers to collect surcharges for TRS and TAP will have the effect of broadening the TRS and TAP contribution bases, such that the TRS surcharge amount of \$0.07 per access line per month should decrease as a result. The Commission should also monitor developing and future technological changes that may impact both demand for TRS services and TAP equipment as well as how they are provisioned.

¹ The TAP surcharge rate of \$0.02 per access line per month was the result of the budget bill in 2006 and as of July 1, 2008, reverts to the original \$0.01 per access line per month as provided for in KRS 278.5499.

Should wireless carriers be required to collect the TRS and TAP surcharges, AT&T requests that the Commission provide a sufficient amount of time to implement this change. AT&T would need a minimum of sixty (60) days, but would prefer ninety (90) days, to provide for the inclusion of this surcharge on its customers' bills.

AT&T respectfully submits these comments for consideration by the Commission.

Respectfully submitted,



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702907

CERTIFICATE OF SERVICE


It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 1st day of February, 2008.

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