

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH)	
TELECOMMUNICATIONS, INC. D/B/A AT&T)	
KENTUCKY FOR DECLARATION OF)	CASE NO.
COMPLIANCE WITH DIRECTORY)	2009-00480
REQUIREMENTS APPLICABLE TO ELECTING)	
TELEPHONE COMPANIES PURSUANT TO)	
KRS 278.541 TO 278.544)	

COMMISSION STAFF'S INFORMATION REQUEST
TO BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T KENTUCKY

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein on or before January 29, 2010. 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 the 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, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When 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.

1. See AT&T Kentucky's Petition at 13. AT&T Kentucky requests that the Commission issue a Final Order in this proceeding no later than April 1, 2010. State whether AT&T Kentucky would have any concerns or objections if the Commission issued a final Order no later than April 30, 2010. If yes, outline those concerns and objections in detail.

2. At page 12 of the Petition, AT&T Kentucky states that it does not make white pages directories available at retail locations. Does AT&T Kentucky provide copies of the Real Yellow Pages and Business White Pages to the general public at retail locations? If so, list the number of commercial locations where AT&T Kentucky currently makes those copies available (i.e., all Kroger locations within counties X, Y and Z; all branch locations for Bank A in counties X, Y and Z).

3. At page 10 of the Petition, AT&T Kentucky states that it will use media releases to advise subscribers of the changes in white pages delivery. State whether AT&T Kentucky will use radio and television advertisements to notify customers of the Residential White Pages Consumer Choice Initiative ("RWPCCI"). If not, explain why AT&T Kentucky will not engage in these forms of advertisement.

4. Refer to Exhibit 1 and footnote 5 of the Petition. State whether AT&T Kentucky has long-range plans to continue distributing its Kentucky "co-bound" directories. State whether AT&T Kentucky will notify the Commission if AT&T Kentucky will discontinue the publication of the white pages portion of any of its "co-bound" directories.

5. At page 10 of the Petition, AT&T Kentucky states that it does not plan to e-mail or text AT&T wireless subscribers about the white pages directory distribution change because the change would only touch a small number of impacted consumers. However, AT&T Kentucky will rely on the internet or mobile devices as primary access to the white pages directory (see footnote 11 of the Petition). What studies or information does AT&T Kentucky have that support its decision not to use e-mail or text messaging?

6. When a subscriber notifies AT&T Kentucky that it wishes to have a printed white pages directory, will that subscriber be put on a list to have the white pages directory delivered each year or will the subscriber have to request a white pages directory from AT&T Kentucky each year he wishes to have one delivered?

7. At page 6 of the Petition, AT&T Kentucky states that, in Jefferson and Oldham counties, it currently distributes annually printed white pages and yellow pages

directories to every residential and business subscriber in AT&T Kentucky's service area except those who have requested not to receive them. Please state whether AT&T Kentucky distributes directories to only AT&T Kentucky subscribers of telephone service or to all subscribers of telephone service regardless of the carrier.

8. Does AT&T Kentucky have any contracts or agreements with Competitive Local Exchange Carriers ("CLECs") in Jefferson and Oldham counties for the distribution of white pages directories? If so, provide a sample and state generally what is required of AT&T Kentucky and whether the RWPCCI will have any effect on these contracts or agreements.

9. Does AT&T Kentucky provide white pages directories to CLECs in Jefferson and Oldham counties for distribution or to any CLEC?

10. Provide a copy of the proposed written notice of the RWPCCI that will be provided to each CLEC.

a. If different types of notices will be provided to different carriers, provide copies of each different type of letter.

b. Provide the timelines under which AT&T Kentucky proposes to provide the RWPCCI notices to competitive carriers.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: DEC 21 2009

cc: Parties of Record

Honorable Mary K Keyer
General Counsel/Kentucky
BellSouth Telecommunications, Inc. dba AT&T
601 W. Chestnut Street
4th Floor East
Louisville, KY 40203