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January 28, 2010

VIA OVERNIGHT MAIL

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

RECEIVED

JAN 29 2010

PUBLIC SERVICE
COMMISSION

Re: Application of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky
for Declaration of Compliance with Directory Requirements Applicable to
Electing Telephone Companies Pursuant to KRS 278.541 to 278.544
PSC 2009-00480

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and six (6)
copies of AT&T Kentucky's Responses to the Commission Staff's Information Requests
dated December 21, 2009.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures


cc: Dennis Howard, Esq., Assistant Attorney General

775681

CERTIFICATE OF SERVICE – 2009-00480

I hereby certify that a copy of the foregoing was served on the following individual by mailing a copy thereof via U.S. Mail, this 28th day of January 2010.

Dennis Howard, Esq.
Assistant Attorney General
1024 Capital Center Drive
Frankfort, KY 40601



Mary K. Keyer

REQUEST: 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.

RESPONSE: AT&T Kentucky has no objection to the Commission's issuing a final Order no later than April 30, 2010.

REQUEST: 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).

RESPONSE: Yes, AT&T Kentucky does provide copies of the Real Yellow Pages and Business White Pages to the general public at 41 locations across AT&T Kentucky's service area. (See attached list.) Distribution racks are owned by third-party vendors who negotiate the placement of the racks with the retail locations. The retail locations where distribution racks are located change over time as the retail locations reassess the space that is available for directory racks. Rack locations outside of Louisville contain co-bound directories comprised of Real Yellow Pages, Business White Pages and Residential White Pages.

Local Businesses that stock AT&T Real Yellow Pages directories

Location	City	County
ANDERSON CO CHAM OF COMM*	Lawrenceburg	Anderson
CITY OF DANVILLE*	Danville	Boyle
MORGANTOWN/BUTLER CO CHAMB OF*	Morgantown	Butler
ARMY COMMUNITY SERVICE*	Ft. Campbell	Christian
THE UPS STORE*	Hopkinsville	Christian
OWENSBORO CHAMBER OF COMMERCE*	Owensboro	Daviess
FRANKFORT CHAMBER OF COMMERCE*	Frankfort	Franklin
SUPER CELL*	Mayfield	Graves
HENDERSON COUNTY CHAMBER OF CO*	Henderson	Henderson
MADISONVILLE/HOPKINS CO CHAM O*	Madisonville	Hopkins
RICHMOND CHAMBER OF COMMERCE*	Richmond	Madison
PADUCAH AREA CHAMBER OF COMM*	Paducah	McCracken
MUHLENBER CO KY CHAMBER OF COM*	Greenville	Muhlenberg
CENTRAL CITY TOURISM COMM*	Central City	Muhlenberg
OLDHAM CO CHAMBER OF COMMERCE	LaGrange	Oldham
COALFIELDS TELEPHONE COMPANY*	Harold	Floyd
FRANKLIN/SIMPSON CHAMB OF COM*	Franklin	Simpson
BOWLING GREEN AREA CHAMBER OF*	Bowling Green	Warren

AT&T Stores that stock AT&T Real Yellow Pages directories

Location	City	County
DANVILLE STORE*	Danville	Boyle
MURRAY STORE*	Murray	Calloway
HOPKINSVILLE STORE*	Hopkinsville	Christian
OWENSBORO STORE*	Owensboro	Daviess
FRANKFORT STORE*	Frankfort	Franklin
HENDERSON, KY STORE*	Henderson	Henderson
MADISONVILLE STORE*	Madisonville	Hopkins
HURSTBOURNE PLAZA STORE	Louisville	Jefferson
BARDSTOWN RD STORE	Louisville	Jefferson
SUMMIT STORE	Louisville	Jefferson
OUTER LOOP STORE	Louisville	Jefferson
JEFFERSON MALL STORE	Louisville	Jefferson
FERN CREEK STORE	Louisville	Jefferson
DIXIE HIGHWAY STORE	Louisville	Jefferson
SHELBYVILLE RD STORE	Louisville	Jefferson
RICHMOND STORE*	Richmond	Madison
MAYSVILLE STORE*	Maysville	Mason
HINKLEVILLE RD STORE*	Paducah	McCracken
CENTRAL CITY STORE*	Central City	Muhlenberg
PIKEVILLE STORE*	Pikeville	Pike
SHELBYVILLE STORE*	Shelbyville	Shelby
BOWLING GREEN RETAIL*	Bowling Green	Warren
CORBIN STORE*	Corbin	Whitley

*Co-bound directories comprised of Real Yellow Pages, Business White Pages and Residential White Pages.

REQUEST: 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.

RESPONSE: AT&T Kentucky will not be using radio and television advertisements to notify customers of the Residential White Pages Consumer Choice Initiative. As stated in our petition, AT&T Kentucky plans to issue media releases so that media outlets are able to provide this at a news level to consumers in the impacted area as occurred when we filed the petition.

For example, the *Louisville Courier-Journal* reported the proposed change for Louisville directory distribution in a news article on December 9, 2009, in an editorial on December 12, 2009, and on its website. We have reason to believe that as the date for this directory distribution change approaches, the media outlets will utilize AT&T Kentucky’s media news releases and again cover this information as a news item.

As stated earlier, AT&T Kentucky believes that by providing information regarding RWPCCI on the cover of the co-bound AT&T Real Yellow Pages and Business White Pages directories, on the stiff cardstock insert and in the Customer Guide section of those directories that the public will have access to complete information explaining RWPCCI at all times. This information details how a consumer can access Residential White Pages listings via the Internet or request a free copy of the printed Residential White Pages. Additionally, every residence and business will receive AT&T’s Real Yellow Pages directory, as opposed to media typically only reaching a portion of the impacted customers.

REQUEST: Refer to Exhibit I 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.

RESPONSE: At this time, AT&T Kentucky expects to continue to distribute its Kentucky “co-bound” directories and will notify the Commission if and when AT&T Kentucky decides to discontinue the publication of the White Pages portion of any of its “co-bound” directories.

REQUEST: At page 10 of the Petition, AT&T Kentucky states that it does not plan to email 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?

RESPONSE: The Kentucky telecommunications market is extremely competitive with a multitude of providers offering consumers service via wireless, cable and VoIP technologies. According to the FCC's report "Local Telephone Competition: Status as of June 30, 2008,"¹ there were over 3.3 million wireless subscribers in Kentucky receiving services from as many as 11 wireless carriers. Based upon 2007 data, the Centers for Disease Control (CDC) study estimated that nearly 21% of Kentucky households have a wireless phone and no longer have a traditional landline telephone.² A non-exhaustive list of Kentucky cable providers providing telephony services includes Insight Communications, Time Warner, The Frankfort Plant Board, NewWave Communications, MediaCom and Murray Electric System. In its February 2, 2009, presentation to J.P. Morgan, Insight Communications indicated it is the largest cable provider in Kentucky and as of December 31, 2008, Insight was providing telephone service to nearly 36% of its billed customers.³ Additional providers of VoIP services include Vonage, Skype, Packet 8 and others. The point of this information is to illustrate that multiple providers are thriving in Kentucky.

It is important to note that AT&T Kentucky does not have email addresses associated with subscribers of competitor services or even with all of its own customers. Similarly, since the overwhelming majority of wireless subscribers' phone numbers are not publicly available, AT&T Kentucky has no way of knowing the wireless phone numbers of the majority of wireless users and therefore is unable to text them.

¹ See http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-292193A1.pdf.

² See <http://www.cdc.gov/nchs/data/nhsr/nhsr014.htm>.

³ See http://www.myinsight.com/DOCUMENTS/IR/PRESENTATION_02.02.09.PDF. This report is for all of Insight's operations which include customers in Kentucky, portions of southwest Indiana and the Columbus, Ohio, area.

It is for the above reasons that AT&T Kentucky believes the plan for three kinds of notices in the Real Yellow Pages directory that essentially all households will receive is a better outreach than emails and text messages to a small segment of the universe of impacted consumers.

The three kinds of notices in the Real Yellow Pages are:

- 1) The toll free number on a “ribbon message” printed on the bottom of the front cover;
- 2) Verbiage in the Customer Guide outlining consumers’ choices for accessing and requesting a copy of the Residential White Pages listings; and
- 3) A stiff cardstock insert included in the edition of the Real Yellow Pages distributed in September 2010 detailing customers’ choices on how to access Residential White Pages listings and obtain a free copy of the directory.

The Real Yellow Pages notices in conjunction with media releases to spur media coverage should reach a broader group of consumers regardless of their telephony service provider.

REQUEST: 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?

RESPONSE: Subscribers will need to request a printed copy of the Residential White Pages each year. By making the Residential White Pages directory available upon customer request, customers can choose if, when and how often they wish to receive an updated version of the Residential White Pages directory - whether that be once a year, every two to three to five years, or not at all.

REQUEST: 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.

RESPONSE: AT&T Kentucky delivers directories to all telephone service subscribers, regardless of the carrier, within the distribution areas of AT&T Kentucky's directories.

REQUEST: 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.

RESPONSE: AT&T Kentucky typically has language contained in its interconnection agreements with CLECs that addresses the availability or delivery of White Pages directories to CLEC subscribers. The RWPCCI will have no impact on these contracts or agreements. AT&T Kentucky will make the Residential White Pages directory available to CLEC customers in the same way it makes it available to AT&T Kentucky customers.

The language generally provides that AT&T Kentucky will make White Pages directories available to CLEC subscribers at no charge.

Following is an extract of Section 8.2 from Attachment 1 of our Interconnection Agreement with Insight Communications. The full agreement is available on the Commission’s website, as well as other interconnection agreements with other CLECs.

8.2 Directories. BellSouth or its agent shall make available White Pages directories to Insight Phone End User at no charge or as specified in a separate agreement between Insight Phone and BellSouth’s agent.

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

RESPONSE: This question is unclear. In an effort to be responsive, however, please see response to Data Request No. 7.

- REQUEST: 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.

RESPONSE: Should the Commission approve AT&T Kentucky's request in this proceeding, the attached accessible letter will be sent to CLECs having interconnection agreements with AT&T Kentucky. The letter will be sent within 30 days of the Commission issuing its order in this proceeding.



AT&T Kentucky
KY PSC Docket No. 2009-00480
PSC Staff Data Request
December 21, 2009
Item No. 10
Exhibit 1

Accessible

Date: Number:
Effective Date: **September 2010** Category: **Other**
Subject: **(DIRECTORY ASSISTANCE/DIRECTORY LISTING ISSUES) White Pages Consumer Choice - KY**
Related Letters: Attachment: **NA**
States Impacted: **Kentucky**
Response Deadline: **NA** Contact: **Account Manager**
Conference Call/Meeting: **NA**

AT&T Kentucky continues to make positive changes that meet and exceed customers' needs.

As always, your customers will be provided with the same directory products and services that are provided to all other customers. In the directory markets identified below, customers will continue to receive the printed Real Yellow Pages and Business White Pages directory with the customer guides pages. Information on the customers' options for accessing free Residential White Pages listings will be prominently displayed on this directory. These options include viewing the listings online at either www.RealPagesLive.com or www.Yellowpages.com, or requesting a free printed copy of the Residential White Pages directory by calling the toll-free number provided in the Real Yellow Pages directory. It is a pleasure to provide all directory users with a choice as to how they access Residential White Pages listings.

Following is a list of markets for which the Real Yellow Pages and Business White Pages directory and customer guide pages will be delivered in 2010. Additional Accessible Letters will be issued if future Kentucky markets are identified where Residential White Page listings will not be delivered without end user request.

Directory Market:

Louisville, Kentucky

AT&T Kentucky reserves the right to make any modifications to or to cancel the above information prior to the proposed effective date. Should any modifications be made to the information, these modifications will be reflected in a subsequent letter. AT&T Kentucky will incur no liability to the CLECs if such information, mentioned above, is cancelled, modified, or not put into effect.

DRAFT