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December 7, 2009

**VIA OVERNIGHT MAIL**

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

2009-00480

**RECEIVED**

DEC 08 2009

**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

Dear Mr. Derouen:

Enclosed for filing are the original and five (5) copies of the 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.

Should you have any questions, please let me know.

Sincerely,

  
Mary K. Keyer

cc: Dennis Howard, Assistant Attorney General (w/enclosures)

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

THE 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 )

**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**

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BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky (“AT&T Kentucky”) hereby files its Application for Declaration of Compliance with Directory Requirements Applicable to Electing Telephone Companies Pursuant to KRS 278.541 to 278.544. AT&T Kentucky is requesting that the Kentucky Public Service Commission (“Commission”) confirm that AT&T Kentucky’s initiative for distribution of its Residential White Pages directory, as discussed herein, satisfies KRS 278.541(1) requiring an electing carrier to provide, as part of its basic local exchange service, access to a standard, alphabetical directory listing that includes names, addresses, and telephone numbers at no additional charge. In support of its application, AT&T Kentucky states as follows:

AT&T Kentucky is a local exchange company serving customers in 77 of the 120 counties in Kentucky. Pursuant to KRS 278.543(1), AT&T Kentucky elected to be subject to KRS 278.541 to 278.544, effective July 12, 2006, making it an “electing utility” as defined in KRS 278.541(2).

AT&T has developed and implemented in several states<sup>1</sup> the Residential White Pages Consumer Choice Initiative ("RWPCCI"), a progressive and environmentally-friendly method of providing customers access to directory listing information that is superior to the current printed directory. AT&T Kentucky makes this filing to inform the Commission and to seek confirmation that implementation of RWPCCI in Kentucky is consistent with Kentucky law governing electing utilities. Generally, the RWPCCI to be implemented in AT&T Kentucky follows the same practice as the other AT&T states. It is important for operational consistency that AT&T Kentucky follows the same processes used in other AT&T states.

As additional support for its Application, AT&T Kentucky points to the Commission's April 20, 2009, Order finding that a similar plan by Cincinnati Bell for distribution of its white pages directory satisfies KRS 278.541(1) ("*CBT Order*").<sup>2</sup>

**I. As an Electing Utility, AT&T Kentucky Is Exempt from the Commission's General Rules Regulating Telephone Companies**

In 2006, the General Assembly enacted HB 337, which created an elective form of alternative regulation and is codified at KRS 278.541 through 278.544.

The new statute authorized telephone companies to elect to be regulated under

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<sup>1</sup> AT&T has implemented RWPCCI in Florida, North Carolina, Ohio, Oklahoma, Texas, Georgia, Indiana and Wisconsin, and is in the process of implementing RWPCCI in Missouri.

<sup>2</sup> Kentucky Public Service Commission Case No. 2009-00029, *In the Matter of: Application of Cincinnati Bell Telephone Company LLC for Declaration of Compliance with Directory Requirements Applicable to Electing Telephone Companies Pursuant to KRS 278.541 to 278.544. CBT Order* at 1-2 ("the Commission finds that CBT's plan for the provision of an internet-based electronic white pages directory, with the option of allowing subscribers to receive a paper copy of a directory upon specific request, equals 'access' to a standard, alphabetical directory listing as required under KRS 278.541. CBT's proposal is, therefore, compliant with state law.").

the new statutory provisions by providing a written notification to the Commission. AT&T Kentucky made the election pursuant to KRS 278.543 effective July 12, 2006.

KRS 278.280(2) empowers the Commission to prescribe rules for the performance of any service furnished by a utility. In accordance with that authority, the Commission promulgated 807 KAR 5:061, Section 5, which requires that telephone companies annually supply their customers with a published directory. Pursuant to KRS 278.543(6), however, as acknowledged by the Commission in the *CBT Order*, an electing utility is exempt from KRS 278.280 and other statutory provisions, as well as any administrative regulations promulgated thereunder.<sup>3</sup>

**II. AT&T Kentucky's New Plan for Providing Access to a Standard Residential Alphabetical Directory Conforms to the Directory Requirements of KRS 278.541**

As an electing utility, AT&T Kentucky is required to provide "basic local exchange service" at regulated rates to customers in its service area that desire basic service. KRS 278.541 defines the elements of "basic local exchange service" as follows:

- (1) "Basic local exchange service" means a retail telecommunications service consisting of a primary, single, voice-grade line provided to the premises of residential or business customers with the following features and functions only:
  - (a) Unlimited calls within the telephone utility's local exchange area;
  - (b) Dual-tone multifrequency dialing; and

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<sup>3</sup> *CBT Order* at 7 ("the Commission finds that this statute [KRS 278.543(6)] prohibits the Commission from applying KRS 278.280 and any administrative regulations promulgated thereunder to an electing carrier.").

(c) Access to the following:

1. Emergency 911 telephone service;
2. All locally available interexchange companies;
3. Directory assistance;
4. Operator services;
5. Relay services; and
6. A standard alphabetical directory listing that includes names, addresses, and telephone numbers at no additional charge.

With respect to local exchange carriers, basic local exchange service also shall include any mandatory extended area service routes accessible as a local call within that exchange area on or before July 12, 2006. Basic local exchange service does not include any features or functions other than those listed in this subsection, nor any other communications service, even if such service should include features and functions listed herein; . . . .

With respect to directories, the only requirement applicable to electing utilities is found in KRS 278.541(1)(c)6, which requires “access to” “a standard alphabetical directory listing that includes names, addresses, and telephone numbers at no additional charge,” but has no specific requirements as to how “access” is to be given.<sup>4</sup> AT&T Kentucky plans to implement the RWPCCI, a new initiative for providing access to the Residential White Pages listings to its customers, and requests that the Commission confirm that AT&T Kentucky’s initiative is compliant with the statute.<sup>5</sup>

For nearly a hundred years, the White Pages directory was an often utilized book, and it served its purpose well. Times have changed, however.

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<sup>4</sup> See also, *CBT Order* at 8 (“the only obligation CBT has with regard to directories is found within the definition of Basic Local Service under KRS 278.541.”).

<sup>5</sup> While AT&T Kentucky is seeking confirmation for all of its service area, AT&T Kentucky’s initial plans are to implement the RWPCCI for the Louisville directory, which is the largest directory published in Kentucky and distributed to the exchanges in Jefferson and Oldham counties. AT&T Kentucky’s immediate plans are to continue to distribute a Residential White Pages directory to every customer in other Kentucky service areas. Attached as **Exhibit 1** hereto is a list of the Kentucky directories currently published and distributed by AT&T within its Kentucky service area.

Based on AT&T's experience in other markets, there appears to be a decline of consumers' use of residential listings in the White Pages directory,<sup>6</sup> which AT&T Kentucky attributes to the following factors:

- A growing number of homes no longer have traditional wireline service,<sup>7</sup>
- Wireless and many wireline devices are capable of storing large volumes of telephone numbers,
- The use of Caller ID and similar technologies that capture numbers has expanded, and
- Telephone lists and directories from work, schools, places of worship, civic associations and similar organizations are more readily available as technology has made it easier for these specialty directories to be published.

Based on the diminishing use of the printed Residential White Pages directories by customers, the growing reliance on and desire to use technological applications to retrieve directory information, and the drive toward environmentally friendly initiatives, change is in order. It no longer makes sense for AT&T Kentucky to distribute Residential White Pages directories to every customer every year. AT&T Kentucky is committed to responding to customers' changing needs as well as to preserving resources and operating in an environmentally friendly manner. Moving to replace an inefficient customer product with a more environmentally friendly solution is a positive initiative that

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<sup>6</sup> It should be noted that all emergency numbers contained in the White Pages today are and will continue to be included in the AT&T Real Yellow Pages®, a copy of which every subscriber will continue to receive under the RWPCCI.

<sup>7</sup> The FCC reported that in June 2008, there were over 3.3 million wireless subscribers in Kentucky (see [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-292193A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-292193A1.pdf)). Additionally, in March 2009, the Center for Disease Control released its state level estimates based upon 2007 data that indicated over 21% of Kentucky households have a wireless phone available and no longer have a traditional landline telephone. (see <http://www.cdc.gov/nchs/data/nhsr/nhsr014.htm>)

effectively melds customers' needs and desires with more efficient resource usage. Recognizing that technological changes lead to lifestyle changes and a demand for innovative new products and services, AT&T has initiated similar directory alternatives in other states to provide customers with more desirable options.<sup>8</sup>

In Jefferson and Oldham counties, AT&T Kentucky currently distributes annually printed White Pages and Real Yellow Pages directories to every residential and business subscriber in AT&T Kentucky's service area except those who have requested to not receive them. Under the RWPCCI, AT&T Kentucky will continue to distribute the Real Yellow Pages and Business White Pages as it does today. The Real Yellow Pages and Business White Pages will continue to include the alphabetical business listings, the business listings by category, government listings, and emergency numbers. Beginning with the implementation of the RWPCCI, the printed Real Yellow Pages will also include an expanded Customer Guide section containing all mandated and other applicable information pertaining to telephone service similar to that presently contained in the White Pages. As it does today, the Customer Guide contains information on 911 and other emergency contact numbers.

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<sup>8</sup> See fn. 1. AT&T's trials of a program similar to that described herein in Austin, Texas, and Atlanta, Georgia, have been in place for nearly 12 months and to date have resulted in a fraction of AT&T's customers (2.49% in Austin and 2.03% in Atlanta) requesting a paper copy of the directory. While AT&T has also recently implemented its Residential White Pages Consumer Choice Initiative in Jacksonville, FL, Cleveland, OH, Charlotte, NC, Columbus, OH, Oklahoma City, OK, West Palm Beach, FL, Ft. Worth, TX, Miami FL, Indianapolis, IN, San Antonio, TX and Milwaukee, WI, AT&T does not have enough data to determine the number of customers requesting paper copies of the directory over several months in those areas. With four months into implementing the RWPCCI in Jacksonville, FL, only 4.35% of customers have requested a directory. Early numbers for other locations appear to be similar to those in Austin and Atlanta.

AT&T Kentucky plans, however, to modify its process of printing and distributing the residential listings in the White Pages directory to all AT&T Kentucky subscribers throughout the state.<sup>9</sup> AT&T Kentucky plans the following timeline for implementing its RWPCCI with respect to the Louisville White Pages in 2010:

- a. April 2010
  - Print and distribute the Louisville White Pages as usual;
- b. September 2010 and annually thereafter
  - Update and print 5%<sup>10</sup> of the number of Louisville White Pages directories to be distributed to those customers who request a copy. This White Pages will contain residential listings, the Customer Guide and emergency numbers.
  - Print and distribute the Real Yellow Pages and Business White Pages to every residential and business subscriber. The Real Yellow Pages will contain the business and government listings, emergency numbers, and Customer Guide.

AT&T Kentucky is committed to providing its customers with the ability to choose how they access and use traditional White Pages listing information by providing the information in multiple formats. Under AT&T Kentucky's RWPCCI, customers will have the following choices for accessing free Louisville Residential White Pages listings:

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<sup>9</sup> AT&T Kentucky's plans for communication and distribution differ somewhat from those proposed by Cincinnati Bell or required by the Commission, but accomplish the same goals. AT&T Kentucky's plans are consistent with what AT&T has been doing or required to do in other AT&T states and provide operational consistencies and efficiencies throughout AT&T's region. A matrix summarizing what AT&T is doing in other states where commission orders were issued is attached hereto as **Exhibit 2** along with copies of the orders issued in those states.

<sup>10</sup> The 5% is based on AT&T's experience to date in other areas where the RWPCCI has been implemented. See fn. 8. Additional directories will be printed if necessary to respond to customer requests.



- [www.realpageslive.com](http://www.realpageslive.com)
- [www.YELLOWPAGES.COM](http://www.YELLOWPAGES.COM)
- Order a free printed residential White Pages directory by calling 1-800-422-1955 or by visiting a dedicated website.

AT&T's user-friendly directory website, [www.realpageslive.com](http://www.realpageslive.com), provides directory information in the traditional directory format. The same look and feel of the printed directory are provided in the on-line format, but with additional capabilities that are simply not possible using a printed version.<sup>11</sup> All of the existing directory information is located on this site, including Residential White Pages listings, Business White Pages listings, government listings, emergency numbers, and the Customer Guide.<sup>12</sup>

Moreover, the website also includes access to the Real Yellow Pages and, as of June 2009, every directory in the 21 states where AT&T publishes directories became available on this site, providing customers with access to more directory information than they currently receive. In order to ensure that customers continue to receive some of the most important information currently included in the White Pages directory, AT&T Kentucky's affiliate will continue to publish and distribute to AT&T Kentucky subscribers the printed Real Yellow Pages directory containing the Business White Pages that will continue to include

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<sup>11</sup> The electronic directory is superior to the printed version in a number of ways: the directory is searchable electronically and listings can be located instantaneously; the user can page forward or backward to check on other listings or see the other portion of a listing caption; it is easily accessible anywhere there is Internet access, even over cell phones and PDAs (personal digital assistants); business websites listed in the printed directory become hot links to the actual business websites in the electronic directory; and font size can be easily adjusted to meet the needs and preferences of each customer.

<sup>12</sup> Prior to its election pursuant to KRS 278.543, AT&T Kentucky was obligated to provide the information that appears in the Customer Guide by 807 KAR 5:061, Section 5(4).

the alphabetical business listings, business listings by category, government listings, emergency numbers, and will include a complete Customer Guide.

Residential listings in the White Pages also are available at YELLOWPAGES.COM. The residential listings on this website are acquired from multiple sources; AT&T listings are but one source for the residential information provided on the YELLOWPAGES.COM website.

Customers may request free directories each year by calling the Directory Distribution Center (“DDC”) at 1-800-422-1955 or accessing a dedicated website, [www.mydirectories.att.com](http://www.mydirectories.att.com).<sup>13</sup> As described above, the Commission should find that AT&T Kentucky’s new initiative for providing access to a standard alphabetical directory conforms to the directory requirements of KRS 278.541.

**III. AT&T KENTUCKY’S COMMUNICATION METHODS WILL EFFECTIVELY NOTIFY CUSTOMERS OF THEIR OPTION TO REQUEST A COPY OF THE WHITE PAGES DIRECTORY**

In formulating its plan to communicate the RWPCCI to its customers, AT&T Kentucky reviewed the Commission’s April 20, 2009, order regarding Cincinnati Bell’s similar petition and considered what AT&T is doing across its region in states where the RWPCCI has been implemented to assure operational consistency and efficiencies. While AT&T Kentucky’s notification methods differ somewhat from those proposed by Cincinnati Bell and ordered by the Commission, AT&T Kentucky’s proposed methods will effectively accomplish the goal of notifying customers and making sure they know about the new White Pages distribution initiative and of their ability to request and receive a free copy

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<sup>13</sup> This dedicated website is scheduled to be operational the week of December 7, 2009.

of the Residential White Pages directory should they so desire. AT&T Kentucky has several means by which it will notify its customers of the RWPCCI.

AT&T Kentucky will provide three separate notifications to its customers in the Real Yellow Pages that will be distributed in September 2010 detailing how they may access and obtain a free copy of the Residential White Pages. First, the following ribbon message will be printed directly on the bottom of the front cover of the Real Yellow Pages, "To obtain a FREE copy of the printed Residential White Pages, please call 1-800-422-1955." See **Exhibit 3**, attached hereto. Second, the Customer Guide of the Real Yellow Pages will include verbiage outlining consumers' choices for accessing and requesting a copy of the Residential White Pages listings. See **Exhibit 4**, attached hereto. Third, a stiff, cardstock insert will be included in the edition of the Real Yellow Pages distributed in September 2010, detailing customer's choices on how to access Residential White Pages listings and obtain a free copy of the directory. See **Exhibit 5**, attached hereto.

In addition to the three separate customer notifications that will be contained in the Real Yellow Pages directories, AT&T Kentucky will also use bill messages and media releases to advise subscribers of the changes in White Pages delivery. AT&T Kentucky does not plan to email or text AT&T's wireless subscribers about the White Pages directory distribution change, as Cincinnati Bell chose to do, because that approach only touches a small number of impacted consumers.

Finally, while not required, after AT&T Kentucky receives a confirmation order from the Kentucky PSC, AT&T Kentucky will provide written notice of the RWPCCI to each competitive local exchange carrier ("CLEC") in Kentucky with whom AT&T Kentucky has a current interconnection agreement. CLEC subscribers will be treated in the same manner as those of AT&T Kentucky when requesting directories.

**IV. AT&T KENTUCKY'S DISTRIBUTION PLAN FOR MAILING WHITE PAGES DIRECTORIES DIRECTLY TO CUSTOMERS WHO REQUEST THEM IS COMPLIANT WITH STATE LAW, IS THE MOST CONVENIENT FOR CUSTOMERS, AND IS ENVIRONMENTALLY FRIENDLY**

AT&T Kentucky's communication plans set forth above will notify customers of their options for accessing, requesting and receiving a copy of the Residential White Pages directory. As indicated, in addition to having the Residential White Pages directory available online, customers will have the option to request a copy of the Residential White Pages directory by making a telephone call or visiting a dedicated website, thereby giving them "'access' to a standard, alphabetical directory listing as required under KRS 278.541."<sup>14</sup> AT&T Kentucky will mail directly to the requesting subscriber's home or business a copy of the Residential White Pages directory free of charge. Given that AT&T Kentucky subscribers "will have the option of continuing to receive a printed directory upon request and at no charge and would not have to exclusively rely upon the electronic version," the substance of AT&T Kentucky's proposal qualifies as "access".<sup>15</sup> As the Commission noted in its *CBT Order*, by providing

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<sup>14</sup> *CBT Order* at 2.

<sup>15</sup> *CBT Order* at 9.

a directory via Internet access, "subscribers will have an additional method by which they can obtain directory listings."<sup>16</sup>

Existing customers will continue to receive a Real Yellow Pages directory every year that will include all information, except the individual residential listings, currently included in the White Pages directory. New customers of AT&T Kentucky will automatically receive a Real Yellow Pages directory containing the Business White Pages upon becoming AT&T Kentucky customers and will continue to receive a Real Yellow Pages directory containing the Business White Pages every year thereafter as long as they reside in the directory area. Both new and existing customers may order a Residential White Pages directory at anytime by simply following the instructions contained in the Real Yellow Pages. By making the Residential White Pages directory available upon customer request, customers can choose how often they wish to receive a Residential White Pages directory, whether that is once a year or every two to three to five years or more. Some customers may even decide or realize that they do not need it at all.

AT&T Kentucky believes that the convenience of ordering a directory via a telephone call or on-line and having it delivered directly to the subscriber's home or business will better meet the directory needs of subscribers rather than printing and making quantities of directories available at physical locations where subscribers must drive to obtain a copy. While CBT proposed to make White Pages directories available in bins at various retail locations, AT&T Kentucky does not utilize that method today to make White Pages directories available.

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<sup>16</sup> *Id.*

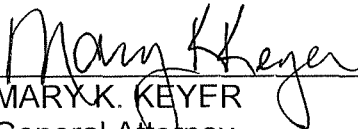
Such a requirement would place additional burdens and costs on AT&T Kentucky and would mitigate the environmental benefits and operational consistencies to be gained from the RWPCCI.

**V. AT&T KENTUCKY REQUESTS EXPEDITED CONSIDERATION BY THE COMMISSION OF ITS APPLICATION**

In order to meet the deadline for processing the changes required to implement the RWPCCI, AT&T Kentucky requests that the Commission expedite its consideration of AT&T Kentucky's initiative for providing access to the Residential White Pages listings in Kentucky and issue its order on or before April 1, 2010.

WHEREFORE, AT&T Kentucky requests that the Commission expeditiously grant its application on or before April 1, 2010 declaring that AT&T Kentucky's initiative for distribution of its Residential White Pages directory, as discussed herein, satisfies KRS 278.541(1) requiring an electing carrier to provide access to a standard, alphabetical directory listing that includes names, addresses, and telephone numbers at no additional charge.

Respectfully submitted,



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COUNSEL FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.  
D/B/A AT&T KENTUCKY



- 1 BARDSTOWN-SPRINGFIELD KY
- 2 BIG-SANDY-AREA KY  
(Pikeville, Paintsville, Louisa, Prestonsburg and  
Counties of Pike, Johnson and Floyd)
- 3 BOWLING-GREEN KY
- 4 CARLISLE KY
- 5 CARROLLTON KY
- 6 CHRISTIAN COUNTY-TODD COUNTY-TRIGG COUNTY KY
- 7 CORBIN KY
- 8 CYNTHIANA KY
- 9 FT KNOX-MULDRAUGH KY
- 10 FRANKFORT/LAWRENCEBURG KY
- 11 GEORGETOWN KY
- 12 HARLAN KY
- 13 HENDERSON/UNION/WEBSTER/MARION/PRINCETON KY
- 14 HENRY-COUNTY KY
- 15 JACKSON KY
- 16 LOUISVILLE KY WHITE PAGES
- 17 LOUISVILLE KY YELLOW PAGES
- 18 MADISONVILLE-MUHLENBERG COUNTY KY
- 19 MAYSVILLE KY
- 20 MIDDLESBORO KY
- 21 MT-STERLING KY
- 22 OHIO VALLEY AREA KY (GTR)  
(Calhoun, Hardinsburg, Hartford, Hawesville and Owensboro)
- 23 OWENTON KY
- 24 PARIS KY
- 25 PURCHASE AREA KY  
(Benton-Gilbertsville, Calvert City, Clinton, Columbus, Fairdealing-Hardin,  
Fulton-South Fulton, Heath-Kevil, Hickman, Mayfield, Murray-Aurora,  
Paducah, Symsonia, and Counties of Ballard, Carlisle and Graves)
- 26 RICHMOND KY
- 27 SHELBY COUNTY KY
- 28 TAYLORSVILLE KY
- 29 WHITESBURG KY
- 30 WILDERNESS TRACE/SPRINGFIELD KY
- 31 WINCHESTER KY
- 32 LOUISVILLE KY COMPANION

NOTE: All Kentucky directories have the White Pages and Real Yellow Pages co-bound in one book, with the exception of the Louisville directory.

State	Customer Notification	realpageslive.com Permissible Option	Distribution Method	Customer's request for White Pages Renews Automatically Each Year	Must Offer White Pages at Point-of-Sale to New Customers or Those Changing Address
Florida (Docket #090082-TL) [Exhibit 2A]	Cover ribbon Bound insert Customer Guide Bill message	Yes	Mailing upon customer request	No	No
Georgia (Docket #30137) [Exhibit 2B]	Cover ribbon Bound insert Customer Guide Bill insert	Yes	Mailing upon customer request	No	No
Missouri (File No. IE-2009-0357) [Exhibit 2C]	Delivery letter in initial year Bound insert Customer Guide Work with media	Yes	Mailing upon customer request	No	No
North Carolina (Docket # P-55, SUB 1767 <sup>1</sup> ) [Exhibit 2D]	Cover ribbon Bound insert Customer Guide	Yes	Mailing upon customer request	No	No
Ohio (Case No. 09-42-TP-WVR) [Exhibit 2E]	Delivery letter Bound insert Customer Guide	Yes	Mailing upon customer request	No	No

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<sup>1</sup> Applied only to Charlotte pilot. Commission approval for additional AT&T North Carolina areas no longer required.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast for waiver of Rule 25- 4.040(2), Florida Administrative Code.	DOCKET NO. 090082-TL ORDER NO. PSC-09-0492-PAA-TL ISSUED: July 8, 2009
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The following Commissioners participated in the disposition of this matter:

MATTHEW M. CARTER II, Chairman  
LISA POLAK EDGAR  
KATRINA J. McMURRIAN  
NANCY ARGENZIANO  
NATHAN A. SKOP

NOTICE OF PROPOSED AGENCY ACTION  
ORDER GRANTING TEMPORARY RULE WAIVER

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

**I. Case Background**

On February 13, 2009, BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast (AT&T Florida), an incumbent local exchange telecommunications company (ILEC), filed a request for a permanent rule waiver pursuant to Section 120.542, Florida Statutes, and Rule 28-104.002, Florida Administrative Code (F.A.C.). AT&T Florida seeks relief from Rule 25-4.040(2), F.A.C., which requires the ILEC to furnish each subscriber a directory of local residential and business listings.

If the waiver is granted, AT&T Florida subscribers would no longer receive printed copies of the residential listings on an up-front basis. Instead, AT&T Florida would only furnish printed copies of its business yellow pages directory and provide the residential listings via the internet. Subscribers could request printed copies of the residential white pages directory or CD-ROM (where available) free of charge by calling a toll-free number.

DOCUMENT NUMBER-DATE

06841 JUL-8 8

FPSC-COMMISSION CLERK

The Florida Administrative Weekly (FAW) notice of AT&T Florida's permanent waiver request was published on March 6, 2009. No written comments were received during the 14-day comment period.

On March 16, 2009, our staff met with representatives of AT&T Florida and the Office of Public Counsel (OPC) to discuss consumer safeguards.

On March 25, 2009, AT&T Florida filed additional information addressing consumer issues and the economic impact of continuing to provide printed residential white pages directories or CD-ROMs on an up-front basis.

On May 19, 2009, AT&T Florida provided, per our staff's request, a mock-up of the yellow pages cover for the Miami-Dade area.<sup>1</sup>

We are vested with jurisdiction in this matter pursuant to Sections 120.542, 350.127, and 364.02(1), Florida Statutes.

## II. Analysis

Under Section 120.542, Florida Statutes, and Rule 28-104.002, F.A.C., a person affected by a Commission Rule may petition this Commission for a waiver of that Rule. We have general statutory authority to grant this waiver under Section 120.542(2), Florida Statutes, which states:

\* \* \*

Variations and waivers shall be granted when the person subject to the rule demonstrates that the purpose of the underlying statute<sup>2</sup> will be or has been achieved by other means by the person and when the application of a rule would create a substantial hardship or would violate principles of fairness. For purposes of this section, "substantial hardship" means a demonstrated economic, technological, legal, or other type of hardship to the person requesting the variance or waiver.

\* \* \*

Rule 28-104.002, F.A.C., states in part:

\* \* \*

(2) The petition must include the following information:

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<sup>1</sup> Section 120.542(8), Florida Statutes, states, "An agency shall grant or deny a petition for variance or waiver within 90 days after receipt of the original petition, the last item of timely requested additional material, or the petitioner's written request to finish processing the petition."

<sup>2</sup> Section 364.02(1), Florida Statutes, defines basic local telecommunications service to include an alphabetical directory listing.

(g) The specific facts that demonstrate a substantial hardship or a violation of principles of fairness that would justify a waiver or variance for the petitioner;

(h) The reason why the variance or the waiver requested would serve the purposes of the underlying statute;

\* \* \*

Rule 25-4.040(2), F.A.C., states in part:

\* \* \*

Each subscriber served by a directory shall be furnished one copy of that directory for each access line. Subject to availability, additional directories shall be provided by the local exchange telecommunications company, which may charge a reasonable fee therefor.

\* \* \*

Additionally, we have statutory authority to place terms or conditions upon any waiver that we grant under section 120.542(2), Florida Statutes. Section 120.542(1), Florida Statutes, states in part:

\* \* \*

An agency may limit the duration of any grant of a variance or wavier or otherwise impose conditions on the grant only to the extent necessary for the purpose of the underlying statute to be achieved.

\* \* \*

Rule 25-4.040, F.A.C., requires various information be included in the directory such as: alphabetical list of all local subscribers (except unlisted or unpublished subscribers); description of local calling area; directory publication date; 911 instructions; the number for the Poison Information Center; contact information for this Commission; and information concerning repair service, directory assistance, service disconnection procedures, emergency interrupt, business and payment offices, No Sales Solicitation, and inside wiring policy. AT&T Florida has stated that all information required by the rule will be available on-line in the "traditional directory format" and in the business yellow pages directories.

To be granted a waiver, a Petitioner must meet the statutory threshold by demonstrating that granting the waiver would serve the purpose of the underlying statute, and demonstrating that without the waiver the Petitioner would have a substantial hardship.

We find that the permanent rule waiver request meets the purpose of the underlying statute (Section 364.02(1), Florida Statutes) by providing directory information without compromising consumer access to listed residential numbers. In response to questions from OPC, AT&T Florida asserted that in 2007, confidential statistical studies of markets in the Southeast, including Florida, showed the average customer using the residential and business listings a combined 1.68 times a month and "73% of the customers believed it acceptable to make the TRWP [The Real White Pages] available only by request." AT&T Florida has already conducted trials in Atlanta, Georgia and Austin, Texas. AT&T Florida stated in its Petition that "less than 1% in Atlanta, [and] just over 1.7% in Austin" requested a residential white pages directory.

AT&T Florida also reported that only four complaints were received from Austin, Texas subscribers concerning the after-hours automated ordering system for the residential white pages directory, and only one complaint had been received about eliminating the up-front delivery of the residential directory. AT&T Florida reported no complaints from Atlanta subscribers.

According to AT&T Florida, other states have provided alternatives to the automatic delivery of printed directories. For example, the Public Utilities Commission of Ohio has approved a similar rule waiver request; in Indiana this matter became a non-issue due to regulatory changes; and the Oklahoma Corporation Commission amended its directory rule, OAC 165:55-7-1, subject to legislative approval, to allow directories to be furnished in a variety of formats.

Adequate notification to subscribers regarding the change in the distribution of residential white pages and how to order a free copy of the directory is crucial. On March 25, 2009, in response to Commission and OPC questions, AT&T Florida filed supplemental information that in addition to three places in and on the Real Yellow Pages Directories (on the cover, in the customer call guide, and on a stiff tab insert), the company would also inform subscribers of the directory distribution change in the "News You Can Use"<sup>3</sup> section of their bills the month preceding and the month a yellow pages directory is issued for a local calling area.

Through discussions with our staff and OPC, AT&T has agreed to make the following modifications to its yellow pages directory to promote subscriber notification:

- For the first year, the words "To obtain a free copy of the residential white pages, please call 1-800-422-1955" will be highlighted on the front cover.
- For subsequent years, the words "For more information on how to obtain a free copy of your residential white pages, please refer to the Customer Guide" will be highlighted on the front cover.
- On the first page of the Customer Guide, the '800' number and the word "free" will be made more prominent by increasing the font and highlighting them in blue.

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<sup>3</sup> In Docket No. 070370-TL we approved AT&T Florida's new billing format which contained the "News You Can Use" section.

In the Customer Guide section, subscribers will find the toll-free number for ordering a free residential directory or CD-ROM (where available). The guide also provides two websites for accessing residential numbers, [www.RealPagesLive.com](http://www.RealPagesLive.com) and [www.YELLOWPAGES.com](http://www.YELLOWPAGES.com).

### **III. Decision**

AT&T Florida's waiver request recognizes advances in technology while protecting the interests of subscribers who want to continue to receive a free printed residential directory. We find that the rule waiver request meets the purpose of the underlying statute and rule by allowing AT&T Florida to provide directory information without compromising consumer access to listed residential numbers. However, before approving a permanent waiver, we find it imperative to receive customer input and to ensure that consumers are aware that they will no longer be provided an up-front copy of the residential white pages, and that they will have to call to request their free copy of the printed residential directory.

Accordingly, we deny AT&T Florida's request for a permanent rule waiver, but grant AT&T Florida a temporary waiver of Rule 25-4.040(2), F.A.C., which requires the ILEC to furnish each subscriber a directory of local residential and business listings. This rule waiver shall remain in effect for a period of two (2) years from the issuance of the Consummating Order.

In conjunction with the granting of this temporary waiver, both this Commission and AT&T Florida shall engage in public outreach, that is designed to actively engage consumers and seek their input regarding the implementation and effects of this rule waiver. The Commission shall go about public outreach through its regular channels of public interaction which might include, but are not limited to, public service announcements, news releases, questionnaires, or on our website. Our staff shall determine the most appropriate and effective methods of notifying consumers and seeking their input. AT&T Florida shall go about public outreach through its own regular channels of public interaction.

Additionally, AT&T Florida shall increase the size of the highlighted words, "To obtain a free copy of the residential white pages, please call 1-800-422-1955," on the front cover of its yellow pages directory, to a minimum of fourteen-point (14) type font. These words shall remain on the cover for the first year of the waiver. The second year of the waiver, AT&T Florida may change the highlighted words to refer consumers to the yellow pages' Customer Guide pages.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast's (AT&T Florida) request for a permanent rule waiver pursuant to Section 120.542, Florida Statutes, and Rule 28-104.002, Florida Administrative Code (F.A.C.) of Rule 25-4.040(2), F.A.C., is denied. It is further

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DOCKET NO. 090082-TL  
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ORDERED that AT&T Florida is granted a temporary rule waiver of the residential directory requirements of Rule 25-4.040(2), F.A.C. This temporary rule waiver shall remain in effect for a period of two (2) years from the issuance of the Consummating Order. It is further

ORDERED that during the two (2) years this rule waiver remains in effect, both this Commission and AT&T Florida shall engage in public outreach designed to seek input from consumers regarding the implementation and effect of the rule waiver. It is further

ORDERED that AT&T Florida shall increase the size of the highlighted words, "To obtain a free copy of the residential white pages, please call 1-800-422-1955," on the front cover of its yellow pages directory, to a minimum of fourteen-point (14) type font. These words shall remain on the cover for the first year of the waiver. The second year of the waiver, AT&T Florida may change the highlighted words to refer consumers to the yellow pages' Customer Guide pages. It is further

ORDERED that this docket shall remain open.

By ORDER of the Florida Public Service Commission this 8th day of July, 2009.



ANN COLE  
Commission Clerk

(SEAL)

JLM

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

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PAGE 7

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on July 29, 2009.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

or CD-ROM format. (*AT&T Petition*, p. 3). If AT&T's request for waiver is granted, a print directory will still be available to any requesting customer, free of charge, by calling a toll-free number. *Id.* at 4. Also, AT&T states that the information currently available in its residential directories will be available on its website. *Id.*

On September 8, 2009 Charter Fiberlink-Georgia, LLC ("Charter") filed a Petition to Intervene ("Charter Intervention"), in which it expressed its concern that Commission approval of AT&T's Petition would violate non-discriminatory provisions of certain agreements between AT&T (and its affiliates) and Charter. The agreements between Charter Fiberlink and AT&T Georgia (and its affiliates) obligate AT&T Georgia to provide Charter's subscribers in Georgia with white page directories in the same manner and at the same time that they are delivered to AT&T Georgia's customers. (*Charter Intervention*, p. 3). Therefore, Commission approval of AT&T's Petition without simultaneously granting Charter the same relief will directly result in Charter's non-compliance with Commission Rule 515-12-1-10(3); alternatively, if the Commission is inclined to otherwise immediately grant the waiver requested by AT&T Georgia, Charter requested that the effective date of the waiver be delayed until reasonable and nondiscriminatory arrangements may be negotiated with AT&T Georgia and a waiver is granted to Charter Fiberlink by the Commission (*Charter Intervention*, p. 5).

In accordance with O.C.G.A. § 50-13-9.1(c), the Commission set a September 18, 2009 deadline for comments from interested parties. AT&T Georgia, Charter Fiberlink-Georgia, LLC, and Competitive Carriers of the South ("Comp South") all filed comments by the deadline. In its pleading, AT&T Georgia attached a stipulation and agreement reached between itself and Charter, and asserts the stipulation and agreement resolves all the outstanding issues raised by Charter in its petition.

Comments filed by Charter echoed the position put forth by AT&T Georgia. Charter's support of the agreement and stipulation stems from the resolution of the two primary concerns identified by Charter in its petition: Violation of the non-discriminatory arrangements entered into between Charter and AT&T Georgia as it relates to Charter's ability to provide directories to its own customers if AT&T Georgia is granted a rule waiver, and a simultaneous rule waiver for Charter so that it would not be in violation of 515-12-1-10(3). The agreement addressed those concerns by first specifying a process by which Charter's customers can contact Charter (in lieu of AT&T Georgia) to request directories, and in turn allowing Charter to forward an electronic file to AT&T Georgia to identify those customers requesting a copy of the residential white pages; and second, providing for simultaneous waivers for AT&T Georgia and Charter so both companies would be in compliance with the directory rule.

In its comments, Comp South stated that while modifying the rule was more appropriate than a waiver, it understood the time constraints may render waiver to be the only feasible option. (*Comp South Comments*, p. 2). Comp South expressed a concern over the fact that the waiver request only applied to AT&T, while the rule applied to all local exchange companies. *Id.* at 1. Furthermore, Comp South stated that any rule waiver should address the potential for anti-competitive behavior if any affected customer has to contact AT&T for a copy of the residential directory. *Id.* Finally, Comp South stated that it is more appropriate to set forth the conditions



detailed in AT&T's proposed agreements with individual CLECs in the context of a Commission Order as opposed to private agreements. *Id.* at 2.

### **III. Staff Recommendation**

Instead of granting a permanent waiver of the rule, Staff recommended that the Commission issue a Notice of Proposed Rulemaking that would provide telecommunications carriers with the opportunity to seek an exemption from the requirement to distribute residential directories. The proposed amendments to Commission Rule 515-12-1-.10(3) would incorporate into the rule a procedure for evaluating whether it is still in the public interest to require an incumbent local exchange carrier to distribute the residential directories to affected customers. The Staff recommended that the Commission hold AT&T's Petition for a Waiver in abeyance until after the Commission acts on the attached NOPR. Assuming the rule amendment is adopted by the Commission and once the amended rule takes effect, AT&T's Petition for a waiver of the rule could then be considered as a petition for relief as set forth in the amended rule.

The Staff provided the Commission with an alternative course of action in the event that the Commission decided to grant some form of rule waiver to AT&T Georgia before the proposed rule change takes effect. If the Commission did not wish to hold the waiver petition in abeyance, then Staff advised that granting AT&T's waiver request in its entirety would still not be appropriate. Instead, Staff argued that limiting any waiver of Commission Rule 515-12-1-.10(3) to the distribution of AT&T's 2010 residential directories for the Atlanta metropolitan area would be more consistent with the public interest and the record before the Commission than the relief requested by AT&T.

### **IV. Discussion**

The Commission finds that it is prudent and consistent with the public interest to grant AT&T's waiver request of Commission Rule 515-12-1-10(3) only to the extent that it applies to the distribution of its 2010 residential directories for the Atlanta metropolitan area. AT&T's request for a waiver is denied to the extent that it seeks further relief. The granting of this waiver is supported by the record that the distribution of residential directories imposes significant costs on AT&T. (*AT&T Response to STF 1-1*). The Commission finds that a substantial hardship, as that term is defined in O.C.G.A. § 50-13-9.1(b)(1), would be imposed on AT&T if the waiver were not granted. The Commission also finds that the intent of the rule may be satisfied through less burdensome means.

The Commission finds that the intent of Rule 515-12-1-10(3) may be met through alternative and less burdensome means. The apparent intent of this Commission rule is to provide information to consumers that will assist them in contacting other persons via their telephones. AT&T contends the study that it references in its Petition indicates that a low percentage of subscribers rely upon the residential directories. (*AT&T Petition*, pp. 2-3). However, the scope of the study was limited to the Atlanta market. (*AT&T Response to STF 1-2*). Therefore, this study does not provide a basis for concluding that the number of customers

outside the Atlanta metropolitan area who use the residential directory is insignificant, or that alternative means to this information are as readily available to customers outside the Atlanta metropolitan area.

The Commission finds and concludes that the waiver granted to AT&T shall be limited to the 2010 residential directories for the metropolitan Atlanta area and be conditioned upon the following:

- (1) AT&T will print the following on the cover of the yellow pages directory: To Obtain a FREE Copy of the Printed Residential White Pages, please call 1-800-422-1955.
- (2) AT&T will print the same information in two other places in the Yellow Pages directory; in the customer Information section and on a stiff card bound inside the book.
- (3) If customers request a printed copy of the directory, it will be delivered to their homes within seven to fourteen days.
- (4) AT&T's website will also direct customers to the AT&T web based white pages directory.
- (5) AT&T's yellow pages website will have an option to allow ordering of AT&T white page directories online.
- (6) AT&T will work with PSC staff to develop a consumer advisory for inclusion on the GA PSC website.
- (7) AT&T will also continue to explore additional ways to communicate this change to customers to ensure that customer needs are met and the transition is seamless.
- (8) In each metropolitan Atlanta residential customer's telephone bill for the next three billing cycles, AT&T will include a bill insert that informs the customers that AT&T will not be distributing a residential directory, and that the customer may obtain a free copy of the printed residential white pages by calling 1-800-422-1955.

The Commission also finds it reasonable to issue the Notice of Proposed Rulemaking proposed by Staff.

#### **V. Ordering Paragraphs**

#### **WHEREFORE, it is**

**ORDERED**, that AT&T's request for a waiver of Commission Rule 515-12-1-10(3) is hereby granted with respect to the distribution of its 2010 residential directories for the Atlanta metropolitan area, subject to the conditions identified in this order.

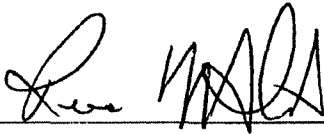
**ORDERED FURTHER**, that AT&T's request for a waiver is denied with respect to all further relief requested.

**ORDERED FURTHER**, that the Commission shall issue a Notice of Proposed Rulemaking under Docket No. 30569 to consider amendments to Commission Rule 515-12-1-10(3).

**ORDERED FURTHER**, that a motion for reconsideration, rehearing, oral argument, or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

**ORDERED FURTHER**, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order(s) as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 6th day of October 2009.



Reece McAlister  
Executive Secretary



H. Doug Everett  
Chairman

10-9-09

DATE

10-9-09

DATE

## EXHIBIT 2C

### STATE OF MISSOURI PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held at its office in Jefferson City on the 24<sup>th</sup> day of July, 2009.

In the Matter of Southwestern Bell Telephone Company, d/b/a AT&T Missouri's Application for Waiver of the General Distribution Requirement of White Page Directories Under 4 CSR 240-32.050(4)(B). )  
)  
) **File No. IE-2009-0357**  
)  
)

### ORDER APPROVING UNANIMOUS STIPULATION AND AGREEMENT

Issue Date: July 24, 2009

Effective Date: August 1, 2009

On April 2, 2009, Southwestern Bell Telephone Company, d/b/a AT&T Missouri filed an application requesting a waiver of Commission rule 4 CSR 240-32.050(4)(B), which requires the company to distribute a copy of its phone directory to each of its customers. AT&T Missouri proposed to continue to publish its white pages residential phone directory, but asked that it be required to distribute that directory only to those customers who affirmatively request a copy. AT&T Missouri asked the Commission to act on its requested waiver by August 1, 2009, so that the company would have time to adjust its paper purchases and printing requirements before beginning to print the next directory.

On April 3, the Commission ordered that notice of AT&T Missouri's filing be given to the public and to potentially interested parties. The Commission also established April 23 as the deadline for the filing of applications to intervene. Charter Fiberlink-Missouri, LLC filed a timely application and was allowed to intervene. Subsequently, the Communications

Workers of America, the union that represents some of AT&T Missouri's workers, filed a late application to intervene, which the Commission also granted.

On June 16, all of the parties joined in filing a unanimous stipulation and agreement regarding AT&T Missouri's request for waiver. Under the terms of the unanimous stipulation and agreement, AT&T Missouri requests a waiver that will apply only to the Kansas City, St. Louis, and Springfield metropolitan calling area (MCA) markets. AT&T Missouri will initially implement its new method of providing residential white page directories only in Kansas City and St. Louis, but it could subsequently expand that method to Springfield without seeking an additional waiver from the Commission.

Under the new distribution method, all AT&T customers will have a yellow page business directory delivered to their homes as before. The new yellow page directory will contain the business white pages, government listings, the customer guide information, and other information required under the Commission's rule that was previously included with the white page residential listings. An information sheet will be delivered along with the yellow page directory informing the customer that they will receive a white page residential customer directory only if they request that directory by calling a dedicated toll-free 800 number. The same information will be prominently displayed in the yellow pages directory. AT&T Missouri will mail the white page residential customer directory to any requesting customer free of charge.

In addition to allowing customers the opportunity to receive a free white pages directory if they want one, AT&T Missouri will also make residential listing information available to its customers through its directory website, [www.RealPagesLive.com](http://www.RealPagesLive.com), as well as [www.yellowpages.com](http://www.yellowpages.com).

Furthermore, AT&T Missouri agrees to provide a white page directory to CLEC customers residing in AT&T Missouri's service territory in the same manner it provides directories to its own customers. Charter Fiberlink – Missouri, one of the signatories to the stipulation and agreement, will inform its customers of the new method by which they can request a white page directory. The stipulation and agreement also asks the Commission to grant Charter Fiberlink – Missouri the same exemption from the regulation that it grants to AT&T Missouri.

After reviewing the stipulation and agreement, the Commission held an on-the-record presentation regarding the stipulation and agreement on July 8. At that presentation, the Commission questioned the parties about the details of their agreement. In addition, the Commission conducted local public hearings in Kansas City on July 6 and St. Louis on July 8 to receive comments from affected members of the public.

After carefully considering the unanimous stipulation and agreement, the Commission finds that the agreement is in the public interest and should be approved. Customers who want to receive a residential white page directory will still be able to receive a free directory by calling a toll-free number provided by AT&T Missouri. Customers who do not want such a directory will be relieved of the burden posed by the appearance of a massive directory on their front step. Most importantly, less paper pulp will be wasted in making unwanted directories and less land-fill space will be required to dispose of old directories.

The Commission will only partially waive its regulation requiring distribution of the residential white page directory so that AT&T Missouri and Charter Fiberlink – Missouri can implement a new means for delivering that directory to the customers who want to receive

that directory. The Commission will retain authority to deal with any customer complaints about how those companies implement those new distribution plans. If AT&T Missouri and Charter Fiberlink – Missouri fail to live up to their obligations, the Commission will not hesitate to revise or revoke the waivers it is granting in this order.

The Commission will address one other matter even though it is not explicitly an element of AT&T's request for waiver or the unanimous stipulation and agreement. A witness at the local public hearing in St. Louis extensively described the difficulty of recycling used phone books. Currently the Commission's regulations do not require phone companies to make an effort to encourage their customers to recycle their phone books. Perhaps they should. The Commission would like to have more information as it considers whether its regulations should be amended. Therefore, the Commission will order AT&T Missouri to file a report in this case briefly describing what efforts it currently makes, or will undertake in the future, to encourage and facilitate the recycling of old telephone directories.

**THE COMMISSION ORDERS THAT:**

1. The unanimous stipulation and agreement filed on June 16, 2009, is approved. A copy of the unanimous stipulation and agreement is attached to this order.
2. The signatory parties are ordered to comply with the terms of the unanimous stipulation and agreement.
3. Southwestern Bell Telephone Company, d/b/a AT&T Missouri is granted a limited waiver of Commission Rule 4 CSR 240-32.050(4)(B) as described in the approved unanimous stipulation and agreement.

4. Charter Fiberlink – Missouri, LLC is granted a limited waiver of Commission Rule 4 CSR 240-32.050(4)(B) as described in the approved unanimous stipulation and agreement.

5. Southwestern Bell Telephone Company, d/b/a AT&T Missouri shall file a report in this case no later than September 1, 2009, briefly describing its current and future efforts to encourage and facilitate the recycling of old telephone directories.

6. This order shall become effective on August 1, 2009.

**BY THE COMMISSION**

( S E A L )



Steven C. Reed  
Secretary

Clayton, Chm., Davis, Jarrett,  
and Gunn, CC., concur.

Woodruff, Deputy Chief Regulatory Law Judge



**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. P-55, SUB 1767

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Tariff Filing by AT&T North Carolina to Modify	)	
Delivery of Asheville, Charlotte, Greensboro,	)	ORDER AUTHORIZING PILOT
Raleigh, Wilmington, and Winston-Salem	)	PROGRAM IN CHARLOTTE
White Pages Directories	)	

BY THE COMMISSION: On March 13, 2009, AT&T North Carolina (AT&T or Company) filed a tariff that would permit the Company, at its discretion, to provide residential white pages listings in Raleigh, Charlotte, Greensboro, Winston-Salem, Wilmington, and Asheville via an internet site, provided that printed copies of the residential white pages listings, or a CD-ROM containing these listings, will be distributed upon customer request. In the transmittal letter accompanying the tariff, AT&T identifies [www.RealPagesLive.com](http://www.RealPagesLive.com) as the website it uses to provide electronic versions of its directories, and said that all of the existing directory information is available on this site, including residential and business white pages listings, government listings, the Customer Guide Section, and AT&T's Real Yellow Pages. The letter further explained that customers would automatically receive a directory which will contain Customer Guide Pages, Community Pages, Government Pages (blue), Business White Pages, EAS listings, and Yellow Pages. Residential White Pages listings will be distributed upon customer request, and customers may request a published residential directory or CD-ROM. AT&T states that the directory, or the CD-ROM, will be delivered to customers within 7 to 10 days after their requests, and that customers will be given a toll free telephone number they can use to request the residential white pages listings. The residential listings, or the CD-ROM, will be provided at no charge to customers. In explanation for these changes, AT&T stated that based on data gathered in two trials conducted during the fall of 2008 in Austin, Texas, and Atlanta, Georgia, less than 1% of customers in Atlanta requested the residential directory and approximately 2% of customers in Austin requested the residential directory.

This matter came before the Regular Commission Conference on April 13, 2009. The Public Staff noted that this tariff is similar to a tariff filing AT&T submitted in September, 2007, which was docketed in Docket No. P-55, Sub 1718. That filing went before the Commission at a Commission Conference on October 15, 2007. On October 19, 2007, AT&T filed a motion asking the Commission to hold the tariff filing in abeyance until AT&T resubmitted its proposal. On October 23, 2007, the Commission issued an Order Dismissing Tariff Filing Without Prejudice.

While this tariff filing and the 2007 filing are similar, the Public Staff pointed out that there are a few significant differences between the filings. The 2007 filing proposed to change the distribution of Raleigh and Charlotte residential white pages listings, while this filing will affect those listings, plus the additional residential white pages listings for Greensboro, Winston-Salem, Wilmington, and Asheville. Therefore, this filing will impact customers across the state. As with the 2007 filing, this proposed directory change will also impact subscribers in neighboring exchanges that receive these directories. Using the Raleigh directory as an example, it is also delivered to customers in the Apex, Cary, Wendell, Knightdale, and Zebulon exchanges, so this change will impact a much wider area than the six named exchanges, and instead will impact a large percentage of AT&T's customers. Another significant difference, in this case a positive difference, is that in this filing AT&T proposes to include EAS listings, both residential and business, in the directory that will be automatically delivered. This change addresses a major concern the Public Staff had with the 2007 filing as to potential discriminatory treatment regarding business listings for home and foreign exchanges.

The Public Staff stated that its primary concern with AT&T's current proposal is that it constitutes a reduction in service, since customers would no longer automatically receive the residential white pages directory listings. Instead, customers would be required to take action in order to receive the same level of service that they have received in the past. It is also a reduction in service to customers who prefer to have their names and numbers distributed to all subscribers, since both business and residence service includes a free white pages directory listing. Technically, the value of that portion of their service would be diminished with each directory that is not distributed.

The Public Staff acknowledged that customers now have a number of additional sources for directory information, and it is certainly plausible, as AT&T claims, that customers increasingly rely on electronic directories to substitute for the traditional white pages listings. However, not all customers have access to computers and the Internet, and some who have access to this technology may still prefer to rely on the traditional white pages directory listings. Therefore, the Public Staff continued to believe that reaction from the public to the proposed change in directory distribution will be mixed. While some subscribers will appreciate the environmental benefits and fewer directories, others will object to the reduction in service and the inconvenience of having to take action to maintain their current level of service.

The Public Staff noted that it has historically opposed changes that require customers to take action to maintain their current level of service. Instead, its position has been that, assuming no action is taken on the part of the customer, the current level of service should be maintained, and that customers who want to initiate a change should be the ones taking action. Therefore, the Public Staff believed the optimal solution would be for this change to be structured so that customers could "opt out" of receiving the residential white pages listings, as opposed to requiring customers to "opt in" in order to continue receiving their current level of service.

The Public Staff also expressed concern about customer notification. AT&T stated in the transmittal letter that the business white pages listings/yellow pages directory, which it will continue to automatically distribute, will "prominently display" information on how customers can receive either a published residential directory or CD-ROM. However, there is no mention of how customers will be informed about the link to the website the Company suggests as an alternative to the published directory. The Public Staff noted that the current AT&T directory displays the name of the yellow pages website in a prominent position on the cover of the directory. Similarly, the AT&T and BellSouth websites prominently display a link to the yellow pages website, but fail to provide a link to the white pages directories. The Public Staff believes that similar treatment of the white pages directory listings website would provide a real benefit for consumers.

Accordingly, the Public Staff recommended that the tariff be allowed to become effective on April 14, 2009, provided that the tariff be modified to reflect that customers may "opt out" of receiving a directory, and that customers who do not "opt out" will continue to receive both business and residential white pages directory listings; and (2) that the white pages directory listings website be added to the front cover of the directory, and be prominently listed on the Company's websites.

Mr. Robert Smith of AT&T responded to the Public Staff's comments and recommendations as well as to Commission questions. He emphasized that the changing telecommunications environment meant that there were many more options by which customers could obtain telephone numbers and that a reduction in the number of white pages directories that would need to be printed – and, hence, would need to be disposed of – would be an environmentally friendly policy. At the same time, customers who desired residential white pages can easily obtain them simply by contacting AT&T.

WHEREUPON, the Commission reaches the following

### CONCLUSIONS

After careful consideration of the proposed tariff and the comments of AT&T and the Public Staff, the Commission concludes that good cause exists to allow AT&T to conduct a pilot program testing the proposal it has outlined in this docket with respect to the 2009 Charlotte white pages directory only. The CD-ROMs and white pages directories which AT&T has agreed to provide to Charlotte-area customers upon request shall, of course, be provided free of charge. No shipping or handling charges shall apply and a local or toll free number shall be available for use by affected customers who request delivery of a CD-ROM or white pages directory. In addition, the development and implementation of adequate and timely customer notice provisions, including things such as media releases, are essential in order to ensure the most comprehensive and complete level of effective customer education and understanding. If possible, any customer who requests a CD-ROM or white pages directory should be given the option to automatically continue to receive that media for at least two additional years without having to renew such request each year, unless the customer

specifically makes only a one-year request. AT&T's proposal represents a major departure in the way that white pages directories are compiled and distributed and, as such, should only become the norm for larger metropolitan areas after a thorough vetting of the relevant facts by way of a pilot program.

To that end, the Commission requests that the Public Staff, Attorney General, and AT&T confer together as soon as practicable as to the precise parameters of the pilot program, customer notice procedures, and the data that should be collected and present same to the Commission for its review and approval at a Regular Commission Staff Conference not later than May 18, 2009. The results of the pilot program in Charlotte shall be filed with the Commission not later than December 31, 2009, so that the Commission can then decide whether to continue, modify, expand, terminate or make permanent AT&T's pending white pages directory proposal.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 15<sup>th</sup> day of April, 2009.

NORTH CAROLINA UTILITIES COMMISSION

*Gail L. Mount*

Gail L. Mount, Deputy Clerk

Pb041509.01

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of AT&T )  
Ohio for Waiver of Certain Minimum )  
Telephone Service Standards as set Forth in ) Case No. 09-42-TP-WVR  
Chapter 4901:1-5, Ohio Administrative Code. )

FINDING AND ORDER

The Commission finds:

- (1) On January 20, 2009, the applicant, AT&T Ohio, a local exchange company (LEC), filed an application by which it seeks a waiver of Rule 4901:1-5-03(B), Ohio Administrative Code (O.A.C.), which is the provision of the Commission's minimum telephone service standards (MTSS) that pertains to the manner in which LECs are to supply directories to their customers. Rule 4901:1-5-03(B), O.A.C., which will be referred to in this finding and order as MTSS Rule 3(B), reads:
  - (B) Local exchange companies (LECs) shall annually supply their customers with directory information through one of the following means:
    - (1) A printed directory(ies) that must include, at a minimum, all published telephone numbers in current use within the ILEC local calling area. Upon a customer's request, each LEC shall provide, free of charge, an applicable directory(ies) for all exchanges which are within the ILEC local calling area, including any exchanges that are within the local calling area as a result of extended area service. The printed directory shall be provided free of charge to customers. LECs may give customers the option to request an electronic directory, where available, but if they make this option available, LECs must, in this instance, provide the electronic directory at no charge.

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Technician Ann Date Processed 2/11/09

- (2) Free directory assistance for all published telephone numbers in current use within the ILEC local calling area. In addition, the LEC shall include on its web site the printed information required by paragraph (C) of Rule 4901:1-5-03 of the Administrative Code. An annual notice shall also inform customers that, in lieu of a printed directory, they will be provided free directory assistance for all telephone numbers in current use within their local calling area.

Thus, the rule provision from which AT&T Ohio seeks a waiver currently requires that LECs supply their customers with directory information through one of two means: either through a printed directory, or through free directory assistance.

- (2) Through this application, AT&T Ohio seeks to have the flexibility of making an electronic directory an acceptable option for delivering residential white pages directory listings, thus eliminating the automatic delivery of printed residential white pages directories to AT&T Ohio customers. According to AT&T Ohio, the Commission recently granted similar relief to Cincinnati Bell Telephone Company LLC (CBT) in a finding and order adopted on January 7, 2009, in Case No. 08-1197-TP-WVR (*In the Matter of the Application of Cincinnati Bell Telephone Company LLC for Waiver of Certain Minimum Telephone Service Standards as set Forth in Chapter 4901:1-5, Ohio Administrative Code*). The applicant explains that, while AT&T Ohio's waiver request differs from CBT's in some respects, the policy and practical reasons underlying the request are the same.
- (3) AT&T Ohio claims that customers have become less reliant on, and have less interest in, white pages directories for a number of reasons. First, AT&T Ohio submits that the movement from wireline to wireless services as well as a high demand for privacy with consumers requesting non-published numbers has contributed to the decreasing number of residential white pages listings. Citing to statistics from the Federal Communications Commission, AT&T Ohio asserts that today over sixty percent of the telephone numbers in Ohio are wireless and thus are not published in the white pages directory. Further, AT&T Ohio claims that many customers seek to access listing information by using

electronic devices in order to retrieve information from their homes, businesses, and remote locations. Also, without question states AT&T Ohio, many customers today favor environmentally friendly alternatives.

- (4) Under its proposal, AT&T Ohio states that customers will have access to an electronic version of the residential white pages directory that is free to anyone over the internet and which contains features superior to the printed directory. According to the applicant, AT&T Ohio's user-friendly directory website, [www.RealPagesLive.com](http://www.RealPagesLive.com), provides directory information in the traditional directory format which has the same look and feel of the printed directory but with capabilities simply not possible using a printed version. Customers will be able to access their local directory from any location where they can establish an internet connection, even over cell phones and Personal Digital Assistants (PDAs). Moreover, AT&T Ohio asserts, business websites listed in the printed directory become hot links to the actual business websites in the electronic directory and font size can be easily adjusted to meet the needs and preferences of each customer. Further, according to AT&T Ohio, all of the existing directory information is located on this site, including residential white pages listings, business white pages listings, government listings, and the Customer Guide, which contains the Customer Bill of Rights and other information required by MTSS Rule 3(B).

AT&T Ohio submits that this website also includes access to the AT&T Real Yellow Pages, and by June 2009, every AT&T directory published throughout the twenty-one states AT&T serves will be available on this site. In order to ensure that customers continue to receive some of the most important information currently included in the printed residential white pages directory, AT&T Ohio proposes to distribute the Customer Guide information and the business white pages with the printed AT&T Real Yellow Pages directory which will continue to be published and distributed by its affiliate to every customer.

- (5) AT&T Ohio recognizes that some customers will continue to have a preference for printed residential white pages listing information; therefore, the company will continue to make this option readily available to customers. By simply calling a toll free telephone number, AT&T Ohio submits, these customers will be able to

request a printed copy of the residential white pages shipped to them at no charge and without any shipping or handling fees. In addition to the two options already discussed, AT&T Ohio will offer two other alternatives to customers. First, through an AT&T website [www.YELLOWPAGES.COM](http://www.YELLOWPAGES.COM), the public may request electronic business and residential white pages listings from anywhere in the country. Second, AT&T Ohio will also publish the Cleveland and Columbus directories on CD-ROMs. These CD-ROMs will contain the same directory content that can be found in the printed directories and on [www.RealPagesLive.com](http://www.RealPagesLive.com). The CD-ROMs will be readily available at no charge and without shipping or handling fees through the same toll free telephone number that will be used to request a printed copy of the residential white pages directory.

- (6) In order to ensure that customers are aware of the directory delivery changes, a full page informational notice will be prominently placed in the front section of the printed directory containing the Customer Guide, the business white pages, and the AT&T Real Yellow Pages that will continue to be delivered annually to customers should this waiver be granted. This page of information will describe all of the alternatives for acquiring residential directory information, including how to access free listings at [www.RealPagesLive.com](http://www.RealPagesLive.com) and how to obtain a free printed copy of the residential white pages listings, a free copy of the CD-Rom (in Columbus and Cleveland), and the toll free telephone number to use to order that information. In addition, AT&T Ohio states that a "ride-along" card or letter containing the same information detailing the directory options available to the customer will be delivered with the printed AT&T Real Yellow Pages during the first delivery cycle associated with directories for which electronic alternatives are replacing delivery of printed residential white pages listings. For these reasons, AT&T Ohio requests that the Commission grant it a waiver from Rule 4901:1-5-03(B), O.A.C.
- (7) On February 4, 2009, the Office of the Ohio Consumers' Counsel (OCC) filed a motion to intervene and a memorandum contra AT&T Ohio's application for waiver. AT&T Ohio filed a reply to OCC's memorandum contra on February 6, 2009. OCC's motion to intervene is granted.



- (8) In support of its memorandum contra, OCC submits that the Commission should deny the waiver request in order to review whether AT&T Ohio's proposal is justified. OCC asserts that the white pages directory contains valuable information such as how to contact the company for repair, billing, and other purposes, and provides customers with quick access to emergency and non-emergency information. Making such information available only through the company's website and in its printed yellow pages is an inadequate substitute, argues OCC. AT&T Ohio believes that OCC misunderstands what the company is proposing. AT&T Ohio agrees that this valuable information, including government listings, the telephone customer bill of rights, and other information that is a part of the "Customer Guide," should be provided to customers. That is why AT&T Ohio will continue to provide a printed copy of this information automatically and annually to each customer as part of the business White Pages located in the front of the AT&T Real Yellow Pages directory. In addition, AT&T Ohio submits, this information will be fully available on-line.

If the Commission grants AT&T Ohio's waiver request, OCC asserts that customers must be adequately notified that they will no longer automatically receive a printed white pages directory. OCC claims that a multimedia customer notification campaign similar to what the Commission approved in the CBT order is essential to protecting consumers' interests. AT&T Ohio responds that prominently affixing information near the front of the AT&T Real Yellow Pages directory on how a customer may obtain a printed copy of the residential White Pages directory free of charge is superior to the broad ranging customer notification campaign OCC urges.

As for new customers, OCC recommends that the Commission require AT&T Ohio to notify new customers, at the time of enrollment, that they may have a printed directory delivered to them free of charge. Further, OCC urges the Commission to require AT&T Ohio to provide to all new customers a verbatim printing of the telephone customer rights and responsibilities, possibly in the welcome letter the customer receives from the company. AT&T Ohio responds that all new customers will automatically receive the AT&T Real Yellow Pages directory which will include not only the Customer Guide, but also the affixed card stock that contains information on how the customers may obtain, free of charge, a copy of the residential White Pages directory.

- (9) Upon review, the Commission finds that, for the following reasons, AT&T Ohio has adequately demonstrated sufficient reason for granting its waiver application. First, AT&T Ohio will make directory listing available through a variety of methods. AT&T Ohio will make directory listings available through www.RealPagesLive.com, which will have the same familiar format customers are accustomed to, through an AT&T website www.YELLOWPAGES.COM, and through a free copy of the CD-Rom which is currently available for Columbus and Cleveland telephone numbers. In addition, AT&T Ohio will continue to make printed residential white pages available to customers free of charge by the customer contacting a toll free telephone number. AT&T Ohio has committed that there will be no shipping or handling charges incurred by the customer for requesting and receiving a printed residential directory through this method. In addition, although the company did not seek this method of directory distribution, we would find it acceptable, similar to the relief granted CBT on January 7, 2009, in Case No. 08-1197-TP-WVR, for the company to make copies of the residential white pages directory available for pick-up by customers at AT&T retail stores or through other retail outlets or public venues that customers might likely visit on a more frequent basis, such as grocery stores, banks, or pharmacies.

In order to ensure that customers continue to receive some of the most important information currently included in the printed residential white pages directory, AT&T Ohio proposes, and we condition our approval of this application upon, the company distributing the Customer Guide information, including a verbatim printing of the telephone customer rights and responsibilities as set forth in the Appendix to Rule 4901:1-5-03, O.A.C., and the business white pages with the printed AT&T Real Yellow Pages directory which will continue to be published and distributed by its affiliate to every customer.

In order to ensure that customers are aware of the directory delivery changes, the company proposes, and we condition our approval of this application on, AT&T Ohio prominently placing a full-page informational notice in the front section of the printed directory containing the Customer Guide, the business white pages, and the AT&T Real Yellow Pages that will continue to be delivered

annually to customers. This page of information must describe all of the alternatives for acquiring residential directory information, including how to access free listings at [www.RealPagesLive.com](http://www.RealPagesLive.com) and how to obtain a free printed copy of the residential white pages listings, a free copy of the CD-Rom (in Columbus and Cleveland), and the toll free telephone number to use to order that information. In addition, AT&T Ohio proposes that a "ride-along" card or letter containing the same information detailing the directory options available to the customer will be delivered with the printed AT&T Real Yellow Pages during the first delivery cycle associated with directories for which electronic alternatives are replacing delivery of printed residential white pages listings. We further condition our approval of this waiver on AT&T Ohio affixing the "ride-along" card or letter to the front of the printed AT&T Real Yellow Pages during the first delivery cycle for which electronic alternatives are replacing delivery of printed residential white pages listings. As for new customers, AT&T Ohio should ensure that new customers, as part of the welcome letter or otherwise, are provided with the directory options information contained on the ride-along card in addition to including such information in the AT&T Real Yellow Pages directory.

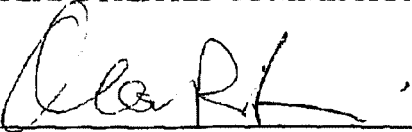
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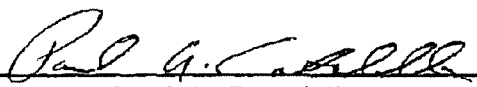
ORDERED, That OCC's motion to intervene is granted in accordance with finding 7. It is, further,

ORDERED, That in accordance with the above findings, AT&T Ohio's application for waiver for Rule 4901:1-5-03(B), O.A.C., submitted on January 20, 2009, is granted subject to all of the conditions set forth in finding 9. It is, further,

ORDERED, That a copy of this finding and order be served upon AT&T Ohio and OCC, as well as all other parties and interested persons of record.

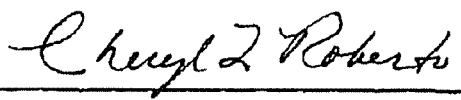
THE PUBLIC UTILITIES COMMISSION OF OHIO

  
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Alan R. Schriber, Chairman

  
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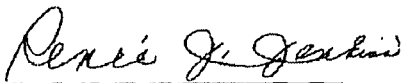
  
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Renee J. Jenkins  
Secretary



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*The Real Yellow Pages*

**Central Florida  
A-Z**

Area Code: 321 / 407



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EXHIBIT 3



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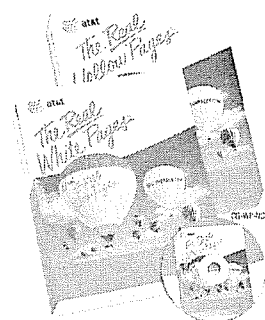
Includes customer listings for all local telecommunications companies.  
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To obtain a FREE copy of the printed Residential White Pages, please call 1-800-422-1955.

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## AT&T OFFERS CONSUMERS MORE CHOICES!

AT&T is committed to exceeding the needs of our customers by providing you with choices as to how you can access your **FREE** Residential White Pages listings. You have the option of using [www.RealPagesLive.com](http://www.RealPagesLive.com), which includes the Residential White Pages, Business White Pages, Government Pages and the AT&T Real Yellow Pages, **YELLOWPAGES.COM**, or request a copy of the directory on CD-ROM or a **FREE** copy of the printed Residential listings directory by calling **1-800-422-1955**. You will continue to automatically receive printed copies of the AT&T Real Yellow Pages and the Business White and Government Pages.



The following four options are available to provide you with **FREE** access to Residential White Pages listings:

- Electronic access through [www.RealPagesLive.com](http://www.RealPagesLive.com)
- Electronic access through [YELLOWPAGES.COM](http://YELLOWPAGES.COM)
- Order a **FREE** printed directory by calling **1-800-422-1955**
- Order a **FREE** CD-ROM for access to all Residential, Business, Government and Yellow Pages listings by calling **1-800-422-1955**

### About The Publisher



Welcome to the AT&T Advertising Solutions family of directories. A division of AT&T, we publish in excess of 1,250 Yellow Pages titles across the nation. We offer a wide range of services to both users and advertisers, beginning with traditional paper products. In some markets we also offer advertising on the internet and in specialty print products.

A leading Internet Yellow Pages and local search site, **YELLOWPAGES.COM™** delivers deep, rich advertiser content under the most intuitive URL in local search. **YELLOWPAGES.COM** provides users with a range of useful tools to make their search easier.

We appreciate the opportunity to serve you as your one-stop shop for telephone numbers, a shopping guide you can trust, and a showcase for your advertising needs. We're proud to have been serving your needs by publishing directories for over 100 years. We hope you will remember to turn to the AT&T Real Yellow Pages for real consumer and business solutions.

### Directory Recycling



We care about the environment and want you to have the resources you need to know where to recycle our phone directories. This directory is 100% recyclable and is printed on recycled paper. To find a local recycling center near you:

- Visit 'Keep America Beautiful' on the Internet at [www.kab.org](http://www.kab.org), or call **1-877-88RECYCLE (1-877-887-3292)**.
- You may also find additional recycling information in the AT&T Real Yellow Pages under the heading "Recycling".

To Order A Directory For Cities Across the U.S. as well as Specialty Directories Call the Directory Sales Center . . . . . **1-800-682-4000**

(Note: Charges will apply for non-local directories)

To Advertise in the AT&T Real Yellow Pages or Online at **YELLOWPAGES.COM**  
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EXHIBIT 5

# AT&T Offers More Choices On How To Access Residential White Pages Listings!



AT&T is committed to exceeding the needs of our customers by providing you with choices as to how you can access FREE Residential White Pages listings in the Central Florida area.

You have the choice of using AT&T's two online options to access Residential White Pages listings. An online version of the printed Central Florida directory can be found at [www.RealPagesLive.com](http://www.RealPagesLive.com) including the Residential White Pages, Business White & Government Pages and the AT&T Real Yellow Pages. Residential listings are also available at [YELLOWPAGES.COM](http://YELLOWPAGES.COM). You will continue to automatically receive printed copies of the AT&T Real Yellow Pages and the Business White & Government Pages.

To order a FREE printed Residential White Pages directory or a CD-ROM that contains the Residential White Pages along with the Business White & Government Pages and the AT&T Real Yellow Pages, please call 1-800-422-1955.



Real White Pages

You now have the following **FREE** options to choose how you access Residential White Pages listings for the your area.

**1) Electronic access through RealPagesLive.com**

- Log onto <http://www.RealPagesLive.com>
- Select search criteria by either method:
  - Type in requested data and press enter
  - Select desired state from map, then select directory from populated list
- Directory cover appears same as Yellow Page printed product
  - Search criteria available in multiple forms
    - Tabs at top for various directory types
    - Popular Categories search feature to the left
    - Page number search feature at the top
- Home page can be selected as a short-cut on your desktop for ease of use & accessibility

**2) Electronic access through YELLOWPAGES.COM**

- Log onto <http://www.YELLOWPAGES.COM>
- Click on the tab "Find A Person" and enter desired information
- Home page can be selected as a short-cut on your desktop for ease of use & accessibility

**3) Order a directory**

You may order a your Residential White Pages **FREE** of charge. Simply call **1-800-422-1955** to place your order. Please allow 2 weeks for delivery.

**4) Order a FREE CD-ROM** for access to the Residential, Business, Government & Yellow Page listings by calling **1-800-422-1955**.



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