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June 27, 2011

VIA OVERNIGHT MAIL

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

RECEIVED

JUN 28 2011

PUBLIC SERVICE
COMMISSION

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

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and five (5)
copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's Report to the
Public Service Commission of Kentucky Regarding White Pages Distribution.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Dennis Howard, Esq., Assistant Attorney General

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BellSouth Telecommunications, Inc.
d/b/a AT&T Kentucky

Report to
The Public Service Commission of
Kentucky
Regarding White Pages Distribution

Case No. 2009-00480

June 2011

Introduction

On December 8, 2009, BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky") filed before the Public Service Commission of Kentucky ("the Commission") its Application for Declaration of Compliance with Directory Requirements Applicable to Electing Telephone Companies Pursuant to KRS 278.541 to 278.544 ("Application"). AT&T Kentucky requested that the Commission confirm that AT&T Kentucky's Residential White Pages Consumer Choice Initiative ("RWPCCI") for distribution of its Residential White Pages directory 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.

Under the RWPCCI, AT&T Kentucky would no longer automatically distribute printed copies of the Louisville White Pages directory. Instead, AT&T Kentucky would provide an internet-based electronic White Pages at no charge, and allow subscribers to receive a printed copy of the White Pages directory at no charge, upon request.

In its April 12, 2010 Order, the Commission found that AT&T Kentucky's RWPCCI satisfies KRS 278.541(1). In addition, the Commission placed certain requirements upon AT&T Kentucky during the course of this change in White Pages distribution. Specifically, the Commission's April 12, 2010 Order required:

AT&T Kentucky to submit an original and five copies of a report to the Commission, with a copy to the Attorney General, no later than June 30, 2011, with the following information:

1. The number of Kentucky subscribers who requested and received free copies of the printed Louisville White Pages directory from May 1, 2010 to June 1, 2011; and

2. Details of complaints made to AT&T Kentucky from end-users or competitive local exchange carriers related directly to AT&T Kentucky's change of its Louisville White Pages directory distribution method. AT&T Kentucky shall summarize the nature of those complaints and shall summarize the company's response (or resolutions) to the complaints.

This report is being submitted in compliance with the Commission's Order. The requirements noted above are addressed in the remainder of this report.

1. The number of Kentucky subscribers who requested and received free copies of the printed Louisville White Pages directory from May 1, 2010 to June 1, 2011

Six Kentucky subscribers requested and received free copies of the printed Louisville White Pages directory during the time period from May 1, 2010 to June 1, 2011. As outlined in AT&T Kentucky's original Application, the timeline for implementation of the RWPCCI was as follows:

- April, 2010 – Louisville White Pages directory was printed and distributed as usual.
- September, 2010 –The Real Yellow Pages[®] and Business White Pages directory for Louisville was updated, printed and distributed to every household and business in Jefferson and Oldham Counties. As AT&T Kentucky indicated in its original application, this directory included the following three separate notifications to customers detailing their options for accessing residential White Pages listings and obtaining a free copy of the Louisville White Pages.
 1. Ribbon message printed directly on the bottom of the front cover of The Real Yellow Pages;
 2. Verbiage included in the Customer Guide of The Real Yellow Pages; and
 3. A stiff, cardstock color insert.

In addition to the three notifications included in the September, 2010 issue of The Real Yellow Pages and Business White Pages, AT&T Kentucky submitted a media release and used bill messages to advise subscribers of the changes for distributing the

Louisville White Pages. It should also be noted that *The Louisville Courier Journal* ran an article on the directory change during the time of the Commission's review of AT&T Kentucky's application.

The next Louisville issue of The Real Yellow Pages and Business White Pages will be updated and distributed in September, 2011. This issue will again contain the three notifications described above, detailing the options for accessing residential White Pages listings, and reminding customers how they can obtain a free copy of the Louisville White Pages.

When the Louisville issue of The Real Yellow Pages and Business White Pages directory is distributed in September, 2011, AT&T Kentucky anticipates there may be a small increase in the number of requests for the Louisville White Pages from customers who prefer to use the printed directory to access residential listings. Since the last printed version of the Louisville White Pages that was automatically distributed is dated April, 2010, the delivery of the September 2011 Louisville issue of The Real Yellow Pages and Business White Pages may prompt these customers to elect to update the Louisville White Pages at that time.

At any time during a directory cycle AT&T Kentucky customers may request free directories by calling the Directory Distribution Center ("DDC") at 1-866-329-7118 or by accessing att.com/mydirectories.

2. Details of complaints made to AT&T Kentucky from end-users or competitive local exchange carriers related directly to AT&T Kentucky's change of its Louisville White Pages directory distribution method.

For the time period May 1, 2010 to June 1, 2011, the AT&T Southeast Customer Advocacy Center received no complaints related to the Louisville White Pages directory distribution method. For the same time period, the AT&T Kentucky State President's Office received one customer inquiry. On May 13, 2011, a customer called to say that his copy of the Louisville White Pages directory was outdated based on the cover message "Please Recycle after March 2011." Once the customer was informed of the new Louisville White Pages directory distribution method, he was satisfied and said he would call to request a new directory.

Summary

AT&T Kentucky's RWPCCI, that eliminated the automatic distribution of the Louisville White Pages directory to every business and household in Jefferson and Oldham Counties, has been successful. Based on the lack of complaints and only six directories requested, it appears Louisville area customers are using other options to access Residential White Pages listings instead of the printed directory. In addition, customers who prefer the printed directory can now choose a new directory whenever they believe they need one. AT&T Kentucky anticipates that requests for the Louisville White Pages directory may increase slightly in the next 12 months due to the timing of the last edition of the directory. Based on the results in other states, however, AT&T Kentucky expects the number of directories requested will continue to be minimal.