



Tracy W. Hatch  
General Attorney

AT&T Florida  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301

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T: (850) 577-5508  
[th9467@att.com](mailto:th9467@att.com)

March 7, 2014

Ann Cole, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
14 MAR -7 PM 4:30  
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**Re: Staff Request for Information Related to AT&T's FCC IP  
Transition Trial Filing – CONFIDENTIAL INFORMATION**

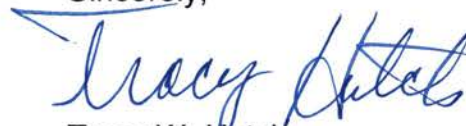
Dear Ms. Cole:

BellSouth Telecommunications, LLC d/b/a AT&T Florida pursuant to Section 364.183(3), Florida Statutes and Rule 25-22.006(5), Florida Administrative Code, hereby makes a claim of confidentiality for the information contained in the attached documents. The attached documents contain confidential and proprietary business information that should be held exempt from public disclosure. In accordance with Rule 25-22.006(5), enclosed are an original confidential document and two redacted copies.

The information contained in the attached documents is being filed at the request of the Commission Staff.

If you have any questions regarding this filing, please do not hesitate to call me at (850) 425-6360.

Sincerely,

  
Tracy W. Hatch

cc: Gregory R. Follensbee



Christopher Heimann  
General Attorney

AT&T Services, Inc.  
1120 20th Street NW, Suite 1000  
Washington, D.C. 20005  
Phone 202 457-3058  
Fax 202 457-3074

REDACTED — FOR PUBLIC INSPECTION

February 27, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

REDACTED

COMMISSION  
CLERK

14 MAR -7 PM 4:30

RECEIVED-FPSC

Re: *Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353*

Dear Ms. Dortch:

AT&T respectfully submits the attached Proposal for Wire Center Trials in the above-referenced dockets. Pursuant to the terms of the Protective Order and Second Protective Order in these dockets, AT&T has redacted from this version all confidential and highly confidential information for public inspection. *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Protective Order, DA 14-272 (rel. Feb. 27, 2014); *Technology Transitions, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014). Tomorrow, February 28, AT&T will file a paper copy of the highly confidential version, which will include the confidential and highly confidential information. If you have any questions, please contact me.

Respectfully submitted by,

/s/ Christopher M. Heimann

Enclosures

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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| In the Matter of  | ) |                      |
|   | ) |                      |
| Technology Transitions  | ) | GN Docket No. 13-5   |
|   | ) |                      |
| AT&T Petition to Launch a Proceeding<br>Concerning the TDM-to-IP Transition | ) | GN Docket No. 12-353 |

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**AT&T PROPOSAL FOR WIRE CENTER TRIALS**

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CHRISTOPHER M HEIMANN  
GARY L PHILLIPS  
LORI A FINK

Attorneys For:  
AT&T Services INC.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, D.C. 20036  
(202) 457-3058 – phone

February 27, 2014

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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| Technology Transitions  | ) | GN Docket No. 13-5   |
|   | ) |                      |
| AT&T Petition to Launch a Proceeding<br>Concerning the TDM-to-IP Transition | ) | GN Docket No. 12-353 |

**AT&T<sup>1</sup> PROPOSAL FOR WIRE CENTER TRIALS**

**Introduction and Overview**

Fifteen months ago, recognizing the seismic forces that were reshaping the communications industry and the economy at large as IP platforms displaced legacy TDM networks and services, AT&T filed a petition asking the Commission to authorize trials to provide a forum for identifying and resolving the many operational, technical and social issues raised by those changes. Under the leadership of Chairman Wheeler, the Commission granted AT&T's petition and provided a blueprint for those seeking approval to conduct such trials. AT&T is pleased to submit this proposal for two trials involving the transition of two wire centers — one rural and one suburban — to all IP services. AT&T's hope and expectation is that

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<sup>1</sup> AT&T Services, Inc. files this proposal on behalf of itself and its operating company affiliates (collectively "AT&T," except where otherwise expressly noted). AT&T provides TDM and IP-based services in the wire centers in which AT&T proposes to conduct the TDM-to-IP transition trials proposed herein through multiple affiliates, including AT&T Communications of the Southern States, LLC, AT&T Corp., AT&T Long Distance, AT&T Mobility LLC, BellSouth Long Distance, Inc., BellSouth Telecommunications, LLC, and SBC of Florida. Throughout this operating plan, the term "AT&T" generically refers to all such entities.



the trials will provide the Commission, AT&T and other stakeholders valuable information to ensure that the historic transition from 20<sup>th</sup> Century TDM technology to next-generation IP networks and services proceeds as smoothly as possible, and in a way that is faithful to the enduring social values — ensuring universal connectivity, consumer protection, public safety, reliability and competition — that must continue to provide the foundation for communications policies in the 21<sup>st</sup> Century.

The significance of this transition from a circuit-switched network to an all-IP world cannot be overstated, nor can its potential to improve American lives and benefit consumers. Indeed, Chairman Wheeler has described the IP transition as “the fourth network revolution,” likening it to Gutenberg’s invention of the printing press, the birth of the railroad, and the advent of instantaneous communications via telegraph and telephone. Each of those revolutions collapsed time and distance as impediments to communication and human interaction. Each resulted in exponential improvements in innovation, creativity, efficiency and human communication.

The IP transition is well underway, even though its potential has barely been tapped. Already it has transformed the way we communicate, educate our children, deliver healthcare, consume energy, obtain news and other information, engage in commerce, and interact with government. These changes, though, are just the tip of the iceberg: we have not yet even begun to imagine, let alone experience, the promise of this Fourth Network Revolution.

Importantly, IP networks are also transforming the structure of the communications industry. In the mid-1990s, during the last significant rewrite of the Communications Act, it was assumed that a communications provider needed to own, or at the very least lease, transmission facilities to the home in order to deliver communications services to customers and countless

pages of new laws and regulations were written to promote investment in or sharing of those facilities. Today, that vision is all but obsolete. To be sure, facilities-based providers of rival broadband platforms engage in intense competition, as was envisioned by the 1996 Act. But this competition is supplemented by intense competition from “over the top” providers of applications and services, which compete head to head with facilities-based providers. Vonage and Skype, for example, compete aggressively with telephone companies, cable multiple system operators (MSOs) and others in the provision of voice telephone services, while Apple, Roku, Google and others deliver video content directly to consumers through small pieces of hardware that connect wirelessly to the consumer’s underlying broadband service. And just last week, Facebook paid \$19 billion for a provider of text messaging services that has more than 400 million users worldwide, despite the fact that it does not provide the underlying connectivity to any of them. Incredibly enough, just a decade ago Facebook itself was an incipient social networking service for Harvard University students; today it is a worldwide platform with 1.25 billion users.

These transformative changes are taking place at an extraordinary pace. Indeed, a significant majority of Americans *already* have transitioned away from circuit-switched telephony, even if many are not aware they have done so. More than 70 percent of residential consumers in the 22 states where AT&T is the legacy “phone company” have abandoned legacy phone service. They rely instead on wireless, VoIP, and/or other services offered by cable companies and others. Indeed, in some states, the number of housing units purchasing legacy circuit-switched services from an ILEC has fallen below 20 percent.

The reason so many consumers have made this transition so quickly is simple: IP-based services offer greater functionality than circuit-switched telephony ever could offer, and the

“value gap” will only widen with the continuing integration of IP networks with cloud computing and the Internet of things. In other words, it is inevitable that over time circuit-switched telephony will become irretrievably obsolete. And that day is fast approaching. Not only are customers abandoning circuit-switched networks and services in droves, making it increasingly uneconomic to maintain those legacy networks, but manufacturers of the equipment needed to maintain and operate those networks are likewise moving on. Those manufacturers want to focus their businesses on the networks of the future, not technology that is being displaced, and so they are discontinuing production of TDM equipment. As a result, it is becoming increasingly difficult to obtain needed spare parts to keep legacy TDM networks going. Indeed, as strange as it may seem, AT&T has had to turn to Ebay to locate spare parts for its TDM network. At the same time, much of the workforce with the expertise to support TDM networks and services has retired or is nearing retirement, and those who are replacing them have no interest in becoming experts in yesterday’s technology. To the contrary, the best and the brightest minds emerging from our nation’s leading engineering universities are focused on IP technologies, the technologies of the future. In short, the IP-transition is well past the tipping point, and at some point in the not-too-distant future it will no longer be possible to maintain traditional TDM-based telephone networks and services. The demand won’t be there, the economics won’t support it, and the parts and labor to keep these networks going will not be available.

This is not news to the Commission. The Commission recognized in its historic National Broadband Plan that IP networks and services are displacing TDM networks and services and that maintaining both platforms in parallel is not a viable long term option. Doing so both “reduces the incentive for incumbents to deploy” next generation facilities and “siphons



investments away from new networks and services.”<sup>2</sup> As Chairman Wheeler recently observed, “[d]ue in part to outdated rules, the majority of the capital investments made by U.S. telephone companies from 2006 to 2011 went toward maintaining the declining telephone network, despite the fact that only one-third of U.S. households use it at all.”<sup>3</sup> “The challenge for the country,” as the Commission put it, “is to ensure that as IP-based services replace circuit-switched services, there is a smooth transition for Americans who use traditional phone service and for the businesses that provide it.”<sup>4</sup> The trials that are now being initiated should provide valuable information that can ensure we meet that challenge. And these trials come not a moment too soon because they can be conducted while the existing circuit-switched infrastructure remains operational.

To be sure, the transition to IP services will continue at rapid pace organically. Certainly that is AT&T’s expectation, and AT&T is putting its money where its mouth is. Through our Project Velocity IP (VIP), AT&T is investing billions of dollars in wireless and wireline broadband networks to support future IP data growth and new services. We are planning to expand our award winning U-verse broadband and video footprint to an additional 8.5 million customer locations in our 22 state wireline footprint (resulting in a total of almost 33 million customer locations — representing approximately 43 percent of our customer footprint — having the capability of receiving a video, voice and broadband bundle). In total, we plan to expand our wireline IP-broadband service to approximately 57 million customer locations, including U-verse

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<sup>2</sup> FCC, *Connecting America: The National Broadband Plan*, at 49, 59 (2010) (“*National Broadband Plan*”).

<sup>3</sup> Prepared Remarks of FCC Chairman Tom Wheeler, Silicon Flatirons, University of Colorado Law School, Boulder, CO (Feb. 10, 2014), available at: <http://www.fcc.gov/document/fcc-chairman-tom-wheeler-remarks-silicon-flatirons> (last checked Feb. 25, 2014) (adding that we must “act to ensure that more investment flows to the fiber-optic networks of tomorrow. . .”).

<sup>4</sup> *The National Broadband Plan* at 59.

services to a total of 33 million customer locations. We expect to be substantially complete in the 2015 and 2016 timeframe. At the same time, we are significantly increasing the broadband speeds available to U-verse customers as part of this plan. More than half of AT&T's U-verse broadband base has downstream speeds of 12MB or higher and we can deliver speeds of up to 45MB to approximately two-thirds of our U-verse video customers.

Our investments are not limited to residential customers. We also are expanding our fiber deployment, building fiber facilities to a planned 1,000,000 additional business locations within our 22 state wireline footprint. That investment will also serve as the platform for additional Distributed Antennae Systems, Cloud capabilities and enhanced Network-based security capabilities.

On the wireless side, we are expanding our 4G LTE network to cover approximately 300 million people across the nation and expect to essentially complete this expansion by the summer of 2014. To enhance that additional coverage, we announced plans to build 10,000 new macro cell sites, utilize over 40,000 small cells and construct over 1000 Distributed Antennae systems.

In total, we expect Project VIP to provide high-speed connectivity to approximately 99 percent of customer locations in AT&T's 22-state wireline service area, producing significantly greater broadband speeds and capabilities for AT&T's customers across the board. Our wireline IP network will reach approximately 75 percent of the customer locations in our 22-state wireline footprint, with many experiencing significantly faster speeds. Those customers will also have access to 4G LTE services, as will almost all the customers who will not be reached by U-verse or U-verse IPDSL. Our 4G LTE network will provide broadband at speeds up to 12 Mbps – significantly more robust than any of our legacy wireline DSL products. In addition to upgrading the reach of our 4G LTE networks, AT&T plans to introduce a Wireless Home Phone

service with LTE capabilities provided by AT&T Mobility, which will enable customers to use their existing home telephone to connect to our wireless broadband service with the features customers expect from a home telephone service, with the additional option of purchasing wireless broadband Internet access service. The only difference is that customers will be connected to our network wirelessly rather than through a legacy twisted-pair, copper loop. As a result of these investments, we will be able to ensure that there are robust options for customers throughout our serving area in an all-IP world. The underlying technology will change and customers will enjoy an expanded palate of enhanced features, functions, and capabilities. But while it is understandable that some consumers fear change, consumers are not going to lose phone service as a result of these trials, nor will AT&T abandon its commitment to the core principles that have guided communications policies over the past century.

To the contrary, in developing its plans for the trials (and the IP transition more generally), AT&T was guided by the same principles and values that the Commission articulated in its order authorizing these trials. These principles are:

- Universal Connectivity – All Americans, regardless of who they are or where they live, should have access to next generation broadband networks and services. The trials should shed light on how best to achieve that core goal.
- Consumer Protection – Consumers are entitled to certain basic protections, including a right to privacy, number portability, and safeguards against fraudulent, deceptive and unfair business practices.
- Public Safety – The transition to next generation wireless and IP-based services should not disrupt public safety, national security or emergency preparedness and response.
- Reliability – Next generation wireless and IP-based networks and services should be dependable and reliable. As we transition to services that rely increasingly on commercial power for customer premises equipment, service providers, manufacturers, consumers, and policymakers need to work together to ensure that such equipment has adequate battery back-up and consumers understand the steps they need to take to avoid losing connectivity during a power outage.



- Competition – Competition produces better outcomes for consumers than regulated or uncompetitive markets. Competition encourages innovation and investment, ensures that consumers have access to the services (including features, functions, and capabilities) they want at prices that are reasonable.

These principles (and the policies and rules enshrining them) have made America's existing communications network the envy of the world, and should continue to apply across all platforms and providers as we complete the historic transition to all-IP networks and services. But the way in which these principles are implemented must evolve to reflect marketplace and technological developments. While all of them are likely to undergo significant adaptation as we complete the IP transition, perhaps none will be as challenging as ensuring that next-generation services extend to all Americans, in particular to Americans who live in rural areas.

In the attached document, AT&T has laid out a detailed plan for how we propose to conduct TDM to all-IP trials in two wire centers. The plan identifies the geographic areas in which AT&T will conduct the trials, the specific TDM-based services that ultimately will be discontinued, the wireless and wireline IP-based alternatives that AT&T will offer, and other competitive alternatives available to customers in the test-bed wire centers. It also details AT&T's plans for notifying customers about the transition and migrating them to alternatives, and identifies special considerations, such as how AT&T proposes to address public safety, access by persons with disabilities, access by seniors and others with unique needs, and other important issues. AT&T is eager to receive input on its proposed trial plan from the Commission and other interested parties. We look forward to working with all stakeholders to resolve any issues that may arise.

For the most part, current federal and state rules will not stand in the way of these trials. We can introduce new IP-based services at any time and indeed already have introduced many

such services. However, we understand the need to work cooperatively with federal and state policymakers to retire the circuit-switched and TDM services that have served this country for so many years. By working together, policy-makers, consumers, service providers and other industry stakeholders will be able to develop plans to manage the IP transition in an efficient and pro-consumer manner, while the TDM network remains in place. This proceeding provides a forum to help ease this transition and address any unresolved or unknown issue that could impede our progress. But make no mistake, whether a customer subscribes to a wireless or a wireline broadband product, the capabilities of both of those services far exceed what is available in the circuit-switched POTs environment.

The Commission successfully has overseen similar technology transitions before. Twice in the past decade, the country has gone through similar transitions in communications technology and services – in the transition from analog to digital cellular service, and from analog to digital TV. In both cases, the Commission planned ahead and adopted policies to “ensure that legacy regulations and services did not become a drag on the transition to a more modern and efficient use of resources, that consumers did not lose services they needed and that business could plan and adjust to the new standards.”<sup>5</sup> These prior transitions establish the critical importance of identifying and cooperatively planning for all of the challenges that may arise as the country completes the TDM-to-IP technology transition, which is likely to have more far-reaching consequences and be more important to the economic growth and well-being of the nation than any that came before. Like the DTV trial in Wilmington, North Carolina, geographically limited IP trials, like those proposed herein, will provide the Commission, industry, and customers invaluable real-world experience regarding the issues that may arise as

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<sup>5</sup> *National Broadband Plan* at 59.

we discontinue the TDM facilities and services on which many Americans still rely even as many others already have made the switch to next-generation wireless and wireline IP-based services.

Under the order the Commission adopted to oversee these trials, wholesale customer participation will be voluntary during the initial stage of the trials. Retirement of wholesale services does remain a critical issue in the conversion to an all-IP world. At the same time we recognize that wholesale access, and other issues, are likely to be contentious, and will spark much debate over the next few years. Consequently, we have included in this plan a description with details of how we intend to proceed with respect to wholesale issues. We will either address those issues by proposing additions to the trials themselves or through existing processes under the Communications Act and the Commission's rules. It is important to be transparent about how these issues fit into the overall IP transition. It is our goal to pursue consensus and certainty regarding these issues, as well as to ensure that all providers have sufficient notice to prepare for the transition and the day when TDM wholesale services no longer will be available.

The IP transition, and the wire center trials detailed herein, will not happen overnight. AT&T expects that the trials and transition will take several years. Many of the products and services AT&T intends to offer in place of traditional, wireline TDM telephone services are already available in the marketplace, and millions of customers already have transitioned to them. But AT&T is still working on developing and enhancing other services that will become available as the trials proceed. Thus, the transition of customers to IP will vary depending on the services at issue, and the trial and this detailed plan likely will change and evolve as we proceed. In all cases, AT&T will seek to encourage to the greatest extent possible a voluntary migration through customer outreach and education. During the first phase of the trial, and after the



Commission's approval, AT&T plans to grandfather existing customers, and offer only next generation wireless and wireline IP-based services for new orders. Ultimately, existing customers will also have to upgrade to such alternatives, but as the FCC has constructed the trials, that second phase will not begin until after the Commission has evaluated results of Phase 1 and authorized us once again to move forward to the full IP transition. In each case though, AT&T will afford customers ample notice regarding the transition so that they can plan accordingly. And consistent with the *Technology Transitions Trial Order*, AT&T will seek Commission approval at each stage in the process to ensure the Commission is satisfied that customers will be protected.

We note that AT&T's proposed wire center trials contemplate network and service changes beyond those addressed in the *Technology Transitions Trial Order*. Thus, we recognize that, at this time, the Commission may not approve all aspects of the trial proposed herein. But, all of the network and service changes identified in the attached plan will be essential to complete the IP transition. And, insofar as the purpose of the trials is to enable all interested parties to identify and resolve the many issues that will arise as the nation migrates to all-IP services, we have sought to identify all of the network, service and other changes that will be necessary to complete the transition (or at least all of the changes we have identified to date) to open a dialogue regarding all of the implications and questions that must be addressed as the transition proceeds. We emphasize that, at all phases of the trial and transition, AT&T will proceed in an open and transparent manner, and that the Commission will remain in control of the trials to ensure that the transition proceeds in a manner consistent with the public interest.

## **Trial Objectives**

The trials AT&T is proposing have several important objectives. First, the trials are designed to provide a process and forum for identifying and resolving the operational, technical, logistic, and other issues (both known and unforeseen) that could arise when existing TDM-based networks and services are discontinued and the customers remaining on those networks have to transition to next-generation wireless and wireline IP-based alternatives. We need to understand how this major technology change will impact consumers to ensure that IP transition proceeds as smoothly as possible, and in a way that is faithful to the enduring social values that have been at the root of communications policies over the past century. The trials provide a forum to work with and hear from customers and policymakers to make sure that we are timely addressing any issues or concerns that could impede an orderly transition. Second, the trials are intended to help AT&T (working with policymakers, customers and other stakeholders) further develop and implement processes for migrating customers (including residential, small and large business, wholesale, and governmental customers) off of traditional TDM networks and services and onto all IP platforms. We need to understand how to actually operationalize this effort efficiently, so that we have as little customer disruption as possible. Third, the trials seek to ensure that customers, manufacturers, policymakers, and other stakeholders have sufficient education and notice regarding the impending transition so that they also have the opportunity to prepare for the time when TDM networks and services no longer are available. And fourth, we hope to come out of the trials with an actionable plan that we can utilize to continue this transition in our approximately 4,700 wire centers and across the country in order to meet our stated goal of completing the IP Transition by the end of 2020.

Consistent with these objectives, the trials seek to replicate on a small scale the broader TDM sunset and migration to all-IP networks and services. Although many of the issues posed by the transition are common to all customers, each customer segment (residential, small and large business, government, wholesale) has its own, unique needs and challenges. Consequently, what works well for one segment may not be the best for another. The trials AT&T is proposing thus seek a complete migration of all customers (or as many as possible) to IP-based services in two wire centers. Excluding particular customer segments and/or services (such as dedicated or wholesale services) from the trial will deprive the Commission, consumers, industry and others of important real-world experience needed to prepare for the IP transition.

### **Trial Locations and Scope**

AT&T is proposing to conduct the trials in a rural wire center in Carbon Hill, AL, and in Kings Point, a suburban wire center in Palm Beach County, FL.<sup>6</sup> AT&T chose these wire centers with an eye towards gaining insights into some of the more difficult issues that likely will be presented by the TDM sunset. For example, Carbon Hill is a sparsely populated wire center located in rural Alabama with particularly challenging economic and geographic characteristics. There are approximately 4,388 living units in the Carbon Hill wire center. Living units include both business and residential locations (even if not currently occupied), as well as business or residential locations currently under construction.<sup>7</sup> Of the 4,388 living units in Carbon Hill to which AT&T offers wireline services, roughly [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent subscribe to AT&T’s retail wireline services (TDM and IP). This fact

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<sup>6</sup> The Kings Point serving wire center is located in an unincorporated part of Palm Beach County, west of the City of Delray Beach, FL. For purposes of this filing and the attached detailed plan, we will refer to that serving wire center as the “Kings Point” wire center.

<sup>7</sup> Living Units are the units AT&T’s network engineers use when designing and building communications networks because each living unit is a separate location that AT&T historically has been required to serve upon request.



underscores the point that many customers already have made the choice, even in rural areas, to transition away from the traditional TDM telephone network and services; it also vividly illustrates the increasingly difficult economics of the traditional wireline business and the regulatory framework associated with it. It is also worth noting that while the Carbon Hill wire center may qualify for funding under the Commission's revised universal service rules, the amount of that funding has yet to be determined — we thus welcome the CAF Phase II trial proposed by the Commission to try to begin finding answers to some of these questions.

Under AT&T's proposed plan, we would provide wireline and/or wireless broadband services to approximately 96 percent of the Carbon Hill living units – **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of those living units will have a wireline broadband alternative and **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent will have only a wireless 4G LTE solution available. Providing broadband services to the final 4 percent of the living units will be more difficult given the economics of deploying broadband services to those areas. AT&T recognizes that it is responsible for ensuring that these customers will have an alternative available to them prior to discontinuing TDM services and is, in all events, committed to working with the Commission, policymakers and other stakeholders to ensure that this happens. It is, however, critically important that we engage in a dialogue that addresses the geographic, demographic, and economic challenges of deploying and offering broadband in sparsely populated areas, like Carbon Hill. This is precisely why AT&T selected Carbon Hill as one of the trial wire centers, so that we and other stakeholders can begin that dialog on how best to resolve this issue while the TDM network remains in place.

Kings Point likewise raises important issues. Kings Point is a suburban wire center located in the West Palm Beach metropolitan area with a large population of older Americans

(according to US Census data, more than 70 percent of its population is over 50 years of age). Although many older Americans already have made the transition from traditional wireline telephone services to wireless and wireline IP-based services (often without even knowing they have done so), as a group they have been slower to migrate to these newer technologies. Kings Point thus will provide AT&T, the Commission and other stakeholders with critical insights into any unique challenges the IP transition may pose for seniors, and how best to address them. There are 49,712 living units in Kings Point to which AT&T offers wireline services, of which only **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent currently subscribe to an AT&T wireline retail service. That means that, like Carbon Hill, a large percentage of customers have already migrated to wireless, IP-based or other services. Under AT&T's current plans, we will offer wireless broadband services to 100 percent of the living units in Kings Point, and wireline broadband services to **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of the living units.

The wire centers AT&T chose for these trials will raise some of the most challenging geographic and economic issues that we will face with respect to the IP transition. While we recognize that other locations will raise issues that may be different in either degree or kind, we believe that these two wire centers will provide many valuable insights into most of the challenges that must be overcome to make the transition as smooth as possible.

Among the most important of these issues is how to achieve universal access to broadband and other communications services in competitive markets. Over the last century, policy-makers and local telephone companies relied on a complex web of implicit subsidies (shifting costs from local to long distance, rural to urban, and residential to business) to fund universal wireline service in rural and other high cost areas. That system made sense at a time



when local telephone companies were granted monopoly franchises in return for their universal service commitment. But the 1996 Act made that regulatory compact obsolete by opening all telecommunications markets to competition and requiring that the web of implicit subsidies, which Congress recognized would no longer be sustainable with competition, be replaced with adequate explicit subsidies targeted to rural and other high cost areas. In the ensuing two decades, robust competition both in urban areas and for the lowest cost, most profitable customers, combined with intercarrier compensation reform, have eliminated the implicit subsidies on which local telephone companies relied to make universal, low-cost wireline service feasible. The introduction of broadband services and the arrival of even more competition from “over-the-top” service providers gave consumers even more choices, but also put the subsidy system in free fall. Existing federal and state universal service support mechanisms (at least for price cap carriers like AT&T) were not designed to make up the shortfall, and the Commission’s new mechanisms to support broadband deployment in high cost areas remain works in progress.

As a consequence, the system pursuant to which one provider (the ILEC) could shoulder the entire burden of achieving universal connectivity in high cost areas is long gone. The good news is that by opening up our markets to competition, we have seen investments by telephone companies that have enabled them to compete in the video market; investments by cable companies that enabled them to compete in the voice market; and investment by cable, telephone, wireless companies and others, resulting in a robustly competitive broadband market that has brought more service choices to consumers. According to a White House report on Broadband Growth released in June 2013, “two of the largest telecommunications companies account[ed] for greater combined stateside investment than the top five oil/gas companies, and

nearly four times more than the big three auto companies combined.”<sup>8</sup> Indeed, between 2009 and 2012, nearly \$250 billion in private capital was invested in U.S. wired and wireless broadband networks, annual investment in U.S. wireless networks grew more than 40 percent, from \$21 billion to \$30 billion, and more high-speed fiber cables were laid in the United States than in any similar period since 2000.<sup>9</sup> But, given the high cost, and limited returns, of deploying broadband in remote areas with sparse populations, some locations lack a positive business case for private sector investment. In these areas, additional universal service support may be necessary to solve the broadband equation for everyone. Thus, while universal connectivity is a bedrock principle that should continue in an all-IP ecosystem, how we as a nation achieve that goal will have to change.

The foregoing universal service, intercarrier compensation, and Lifeline issues have been raised in a myriad of different proceedings currently pending before the Commission. We hope and expect that the trials commenced in this proceeding will provide the context and information the Commission needs to complete its reform of universal service in a way that will enable the United States to achieve its goal of ensuring that all Americans have access to affordable broadband services. And, as we indicate above, AT&T is committed to working with policy-makers, customers, industry, and others to find the right solutions.

#### **Services Included in the Trials**

AT&T proposes to include in the trials all of its consumer TDM-based voice and internet access transport services, and to offer AT&T’s U-verse Voice service, AT&T’s U-verse High

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<sup>8</sup> Office of Science and Technology Policy & The National Economic Council, *Four Years of Broadband Growth*, at 5 (June 2013) (citations omitted), available at [http://www.whitehouse.gov/sites/default/files/broadband\\_report\\_final.pdf](http://www.whitehouse.gov/sites/default/files/broadband_report_final.pdf) (last checked Feb. 23, 2014).

<sup>9</sup> *Id.* (citations omitted).

Speed Internet services, and AT&T Mobility's Wireless Home Phone and Wireless Home Phone and Internet with 4G LTE Broadband services in place of those TDM services. Customers within AT&T's wireline IP network footprint have access to AT&T's U-verse® Voice and High Speed Internet services, which provide next-generation voice calling features and high-speed broadband Internet access.<sup>10</sup> Customers in AT&T's wireless footprint also will be able to purchase one of AT&T's commercial mobile radio services (CMRS) (including AT&T Mobility's Wireless Home Phone and Wireless Home Phone and Internet with 4G LTE Broadband service) in place of traditional, TDM-based voice telephone services. For those customers located outside AT&T's wireline IP footprint, AT&T will offer only its Wireless Home Phone and Wireless Home Phone and Internet with 4G LTE Broadband service (or other wireless services) in place of TDM services.<sup>11</sup> AT&T's Wireless Home Phone and Wireless Home Phone and Internet with 4G LTE Broadband services include nationwide calling with enhanced calling features. The wireless Internet component of Wireless Home Phone and Internet provides broadband Internet speeds generally capable of downstream speeds between 5-12 Mbps. AT&T's LTE network is consistently recognized as the fastest, most reliable LTE network in the nation.

AT&T also proposes to transition its current retail business customers in the trial wire centers from TDM-based voice and data services to wireless and wireline IP-based services over the next three years. AT&T will offer business customers within its wireline IP network

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<sup>10</sup> Approximately [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of the living units in the King's Point Wire Center will have access to AT&T's U-verse video service as well as broadband and voice.

<sup>11</sup> Fewer than one percent of AT&T existing consumer customers with TDM-based services are located in areas outside of AT&T's IP network footprint and are ineligible for the Wireless Home Phone products because of the wireless network coverage issues.



footprint a variety of IP-based business-class voice services that include next generation calling features,<sup>12</sup> such as U-verse® Business Voice, AT&T Voice DNA® and IP Flexible Reach, in place of legacy TDM services, such as BellSouth Centrex and Business Access line services. AT&T also offers IP-based Internet access and data services in the Trial Wire Centers, including U-verse® High Speed Internet-Business Edition, and a variety of business-class Ethernet services that deliver extremely reliable service at ultra-fast speeds. AT&T is in the process of developing a wireless business phone product, which (like Wireless Home Phone) will enable business customers in AT&T's wireless footprint to use their existing CPE to communicate over AT&T's wireless network. AT&T's Wireless Business Phone service will include nationwide calling with enhanced calling features designed for business and wireless Internet access using AT&T's 4G LTE network.

The wireless and wireline IP-based services that AT&T will offer in place of traditional TDM-based services will support the vast majority of the devices and applications enumerated in Appendix B of the *Transitions Trial Order*. However, AT&T does not currently plan to support certain limited applications with rapidly declining market demand or applications that are based on outdated technology. In the Device and Application Compatibility Chart included in the attached Wire Center Trial Operating Plan, AT&T has identified whether particular applications or devices currently supported over TDM also are (or will be) supported over AT&T's wireless and wireline IP-based replacement services (we also identify the date by which AT&T expects to support applications and devices still under development). We do so in order to ensure that all

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<sup>12</sup> AT&T's wireline IP network in the Carbon Hill and Kings Point wire centers currently covers [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of the service locations of AT&T's current business customers in Kings Point, percent in Carbon Hill. AT&T recognizes that it is and [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] responsible for ensuring that these customers will have an alternative available to them prior to discontinuing TDM services and is, in all events, committed to working with the Commission, policymakers and other stakeholders to ensure that this happens.

interested parties have an opportunity to engage in a dialog regarding the features and functions consumers and businesses that should continue in an all-IP ecosystem even if the particular application by which that functionality is provided today is retired.

In addition, AT&T Mobility's Wireless Home Phone and Wireless Home Phone and Internet services currently are not compatible with analog data devices and services (*e.g.*, home security systems, fax machines, and dial-up Internet service). AT&T understands the importance of some of these capabilities and is therefore developing enhancements to Wireless Home Phone with LTE that will allow this wireless service to work with analog data devices, such as alarm monitoring, medical alert and credit card applications. We currently plan to introduce all of the foregoing enhancements **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]**. AT&T will not seek to grandfather its TDM-based voice services until these enhancements are available.

Like AT&T Mobility's other mobile wireless ("CMRS") service offerings, Wireless Home Phone presently complies with the Commission's existing CMRS 911 service regulations (47 C.F.R. Part 20). This means that, depending on the subscriber's location, Wireless Home Phone will provide access to Basic 911 Service (Basic), Phase I Enhanced 911 Service (Phase I), or Phase II Enhanced 911 Service (Phase II). As the Commission knows, Phase II service includes providing the PSAP both the telephone number of the originator of the 911 call and the caller's longitude and latitude in conformance with the Commission's Phase II accuracy requirements.<sup>13</sup> All of the PSAPs serving the Carbon Hill and Kings Point wire centers are Phase II compliant.

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<sup>13</sup> 47 C.F.R. § 20.18(h).

AT&T recognizes that regulators and the public safety community have raised concerns regarding situations in which consumers are *required* to accept a different standard of 911 access, and thus is working on a solution to address these concerns. Specifically, AT&T is developing upgrades to the 911 capability of Wireless Home Phone by adding an ALI function to emulate the customer's experience with wireline TDM service.<sup>14</sup> To emulate the wireline 911 experience in a mobile offering, we are developing enhancements that will allow AT&T to send MSAG information to the appropriate PSAP while the device is at a registered service address. Under any such solution, the service would have to allow subscribers to update their MSAG address easily and accurately when the base station device has been moved to a new location.<sup>15</sup> To the extent a customer uses the device while in motion (such as in a mobile home or other vehicle), the device would provide the same 911 functionality as any other CMRS device. We currently plan to introduce this enhancement **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]**. AT&T will not seek to grandfather its TDM-based voice services until this enhancement is available.

AT&T has included in Exhibit E Product Data sheets for each TDM-based service that AT&T proposes to grandfather, and ultimately sunset, in the trial wire centers. The Product Data sheets provide the following information concerning each service: current customer counts for the service, proposed grandfather and sunset dates, proposed customer notification dates, AT&T's replacement products, and the presence of competitive alternatives in the trial wire centers.

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<sup>14</sup> Today, with wireline telephony, calls to 9-1-1 provide both the call back telephone number (ANI) and the Master Street Address Guide (MSAG) location—*i.e.*, the dialing party's actual street address.

<sup>15</sup> If the wireless device were not at the registered MSAG location, then the service could still provide the calling party's ANI and ALI, *i.e.*, the latitude and longitude of the caller's location, as appropriate for any other wireless device operating on AT&T's licensed spectrum.



## Protecting Enduring Values

### *Protecting Consumers*

AT&T will continue to meet its historic commitment to meeting the needs of persons with disabilities and populations with unique needs (including seniors, persons with limited English proficiency, low-income populations, and residents of Tribal lands).<sup>16</sup> That commitment will not change during the trials proposed herein (or, indeed, during the broader IP transition). That commitment is unparalleled in the communications industry and is a model for service providers in other industries.

From its founding, AT&T has recognized the vital role that technology can play in enhancing the lives of all persons, especially those with disabilities, and how products designed to enable disability access can benefit all customers.<sup>17</sup> Thus it has integrated accessibility into all aspects of the product and service life-cycle from basic research and product development to marketing and customer service in order to create cutting-edge products and services to meet the communications needs of persons with disabilities, seniors and other underrepresented populations with unique needs, and ensure that they can benefit from advances in communications technologies. Among other things, AT&T has developed a corporate

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<sup>16</sup> As discussed in section 6.2.2. of the Trial Operating Plan, one of the IP-based replacement services AT&T will offer in the trial wire centers is its Wireless Home Phone service. The price of Wireless Home Phone is lower than a typical customer pays today for traditional telephone service, providing low income consumers (including seniors on a fixed income) a low-cost option that meets their budgetary needs.

<sup>17</sup> Indeed, Alexander Graham Bell, the founder of AT&T, was a teacher of deaf people, and his invention of the telephone in 1876 was an outgrowth of his efforts to develop the first hearing aid. Global Initiative for Inclusive Information and Communication Technologies (G3ict), White Paper, *Accessibility, Innovation, and Sustainability at AT&T: How a culture of inclusion and the adoption of Universal Design at AT&T drive business processes to serve persons with disabilities*, at 13 (2013) (listing early accessibility milestones at AT&T) (available at: [http://www.att.com/Common/merger/files/pdf/G3ict\\_White\\_Paper.pdf](http://www.att.com/Common/merger/files/pdf/G3ict_White_Paper.pdf)), attached hereto as Exhibit G. G3ict is an Advocacy Initiative of the United Nations Global Alliance for ICT and Development, which seeks to facilitate and support implementation of the Convention on the Rights of Persons with Disabilities.

accessibility policy, which provides that AT&T will perform accessibility evaluations as early as feasible in the design of new and redesigned products and services, networks, and applications, and implement accessibility features where achievable. It has a Corporate Accessibility Technology Office to undertake those evaluations and to engage the disability community about how to improve the accessibility of products and services to persons with disabilities. AT&T also has a Human Factors Group to test company designs to evaluate the accessibility and usability of products and services, and invites aging adults and persons with disabilities to take part in these studies as appropriate.

Although AT&T itself does not develop or manufacture customer equipment, it works with manufacturers and third-party accessibility, aging, technology and disability organizations to encourage and specify the development of products that meet the needs of persons with disabilities, seniors, and others with unique needs. It also has an Advisory Panel on Access and Aging, which meets regularly with national leaders in assistive technology, aging and disabilities to discuss issues impacting customers, emerging accessible and usable technologies, current products and services, and customer service for persons with disabilities and seniors; a Citizenship & Sustainability Expert Team on Access and Aging to champion accessibility across AT&T; a National Center for Customers with Disabilities, which handles inquiries and requests relating to AT&T Mobility's products and services; and a Disability and Aging Center, which operates call centers dedicated to serving the elderly and persons with disabilities, in English and in Spanish, across AT&T's entire wireline footprint. In addition, AT&T has customer service representatives available to respond to inquiries from persons with limited English proficiency in Cantonese, Mandarin, Korean, Tagalog, Japanese, Russian, and Polish, in addition to Spanish. In short, ensuring that persons with disabilities, seniors and other populations with unique needs

have access to communications products and services that meet their needs is our commitment and integral to everything we do.

AT&T has a proven track record of delivering innovative solutions to ensure that persons with disabilities and others with unique needs have access to cutting edge communications technologies and services. The following list highlights just a few of these solutions:

#### FACETIME OVER CELLULAR

In October 2012, AT&T rolled out several new billing plans making FaceTime over Cellular available to deaf and hard of hearing customers who qualify for special text and data-only packages.

#### TEXT ACCESSIBILITY PLAN (TAP)

AT&T offers the Text Accessibility Plans (TAP), which was designed with input from the deaf community and provides lower-cost data and text plans for the deaf and hard of hearing.

#### FREE 411 (MOBILITY DIRECTORY ASSISTANCE)

Recognizing that directory assistance services can facilitate dialing by customers with significant visual, cognitive, and physical disabilities, AT&T provides 24/7 access to live operators to enable customers to obtain local and national telephone numbers and addresses ( which can be delivered via a text message), and connections to those numbers at no additional fee to qualified customers. Customers also can use 4-1-1 Info to obtain information regarding nearby businesses, movie showtimes, turn-by-turn driving directions, reverse lookup, and business category search information.

#### U-VERSE® EASY REMOTE



AT&T developed Easy Remote to make it easier for persons with disabilities and older customers to access and use AT&T's award-winning U-verse television service through voice commands, and even customer gestures. U-verse Easy Remote provides access to more than 50 powerful and user-friendly features, like customizable screen displays and gesture commands, to help users quickly navigate to their favorite channels. Powered by AT&T Watson<sup>SM</sup> speech recognition technology through the AT&T Speech API, the app not only recognizes voice input, but also will learn and adapt to individual speech patterns. The U-verse Easy Remote app is currently available for download free of charge in the iTunes store.

#### AT&T SPEECH MASHUP

AT&T's cloud-based Speech Mashup enables anyone to easily create innovative and accessible services for a wide variety of internet connected devices including smart phones, tablets, computers and television control boxes. In 2011, AT&T received the FCC Chairman's "Lifted By The Cloud Award" and the FCC Chairman's Award for Advancement in Accessibility for Speech Mashup.

#### ACCESSIBLE DVR PROGRAMMING FOR U-VERSE TV

AT&T U-verse customers can program their DVR from their PC, allowing visually impaired subscribers to easily schedule recordings.

#### HEARING AID COMPATIBLE MOBILE PHONES

To ensure that deaf and hard of hearing individuals have access to digital wireless devices that meet their needs, AT&T offers dozens of hearing aid compatible mobile phones with different features and at different price points. Nearly all of these devices carry a

compatibility rating of M3 or M4, which are less likely to generate interference to hearing devices.

AT&T also has been recognized frequently as a leading provider of accessibility and equal opportunity by disability organizations, including:

- American Foundation for the Blind Access Award, 2013, which honors individuals, corporations and organizations that eliminate or substantially reduce inequities faced by people with vision loss. AT&T won the award for its U-Verse Easy Remote App;
- DiversityInc Top 10 Companies for People with Disabilities, 2013, which ranked AT&T at number 6 (AT&T also ranked in the top 10 in 2012);
- DiversityInc Top Company for Supplier Diversity, 2013;
- Careers and the Disabled Magazine Top 50 Employers List, 2012 (AT&T ranked as Number 1 employer for professionals with disabilities);
- USBLN Market Share Corporation of the Year, 2011 (presented to the employer that has demonstrated exceptional products and/or services to benefit the disability community);
- Equal Opportunity Employer Magazine, 2011, Top 50 Employer;
- 2013 Company of the Year from the Texas Department of Assistive and Rehabilitative Services (DARS) for a "culture that gives all employees the opportunity to excel both personally and professionally."

AT&T has included in its detailed plan for conducting TDM to all-IP trials an outreach plan for persons with disabilities and other populations with unique needs as an integral component of the trials to ensure that they will continue to have access to the communications services they need. That plan has five elements: identifying customers with disabilities in the trial wire centers; customer outreach and education; customer care and support; identifying accessible technology solutions; and transitioning persons with disabilities from one service to another. Taken together, these elements will ensure that AT&T can and will meet the needs of disabled persons and other populations with unique needs.

*Protecting Customer Privacy.*

AT&T will conduct all aspects of the trial consistent with the AT&T Privacy Policy, which applies to our legacy TDM services, as well as IP-based services. In addition, AT&T will continue to comply with applicable privacy laws and regulations, including those concerning customer proprietary network information (CPNI). AT&T has established comprehensive processes and procedures designed to ensure compliance with the Commission's CPNI regulations.<sup>18</sup> Accordingly, pursuant to the Commission's 2007 order extending the CPNI regulations to interconnected VoIP providers, the AT&T business units that provide interconnected VoIP services – AT&T Business, AT&T Home Solutions and AT&T Mobility – apply these processes and procedures today to safeguard the CPNI of AT&T's interconnected VoIP customers.<sup>19</sup> AT&T's CPNI processes and procedures are described in AT&T's annual CPNI compliance certifications filed with the Commission pursuant to 47 C.F.R. § 64.2009, and will apply to all CPNI generated in connection with the interconnected VoIP services used in the trial.<sup>20</sup>

**Wholesale Services**

Any robust and meaningful examination of the processes necessary to effect an orderly transition from legacy TDM-based services to an all-IP ecosystem necessarily must include an assessment of the impact of that transition on wholesale customers. To that end, AT&T has endeavored to identify the extent to which wholesale customers are active in the two trial wire

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<sup>18</sup> 47 C.F.R. § 64.2001 *et seq.*

<sup>19</sup> *See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information*, 22 FCC Rcd. 6927, ¶¶ 54-59 (2007).

<sup>20</sup> *See, e.g.*, AT&T Annual CPNI Compliance Certifications Calendar Year 2012, EB Docket No. 06-36, filed Mar. 1, 2013; AT&T Annual CPNI Compliance Certifications Calendar Year 2011, EB Docket No. 06-36, filed Mar. 1, 2012; AT&T Annual CPNI Compliance Certifications Calendar Year 2010, EB Docket No. 06-36, filed Mar. 1, 2011.



centers, as well as the legacy TDM products and services they are obtaining and their IP-based replacements, and to develop plans for engaging those customers in the trials and encouraging them to purchase the replacement products and services. As is the case with AT&T's retail customers, a complete test of the transition will entail the required participation of all actors in the test wire centers, including wholesale customers. AT&T nevertheless is prepared to move forward with trials in the test wire centers subject to the condition established in the *Transition Trials Order* limiting the involvement of wholesale customers in the initial phase of the trials to those that participate voluntarily.<sup>21</sup> But, as the *Order* contemplates,<sup>22</sup> AT&T intends to pursue additional phases of these trials that would include, with the Commission's authorization through the Section 214 process, the complete withdrawal of TDM-based wholesale services. To that end, AT&T has identified in the detailed plan the interstate TDM wholesale services for which 214 applications will be filed, and anticipates submitting an application to grandfather those services in the trial wire centers.

AT&T values its relations with its wholesale customers, and intends to work aggressively to retain their business as the entire industry undergoes the transition to an all-IP ecosystem. AT&T is interested in receiving feedback from its wholesale customers on how the transition can work best for their needs as well as the needs of their customers. Accordingly, AT&T has identified the replacement products that already are available as alternatives to current legacy TDM services – such as the AT&T Switched Ethernet (ASE) service that is available to replace DSn-level special access services and high capacity loop and transport UNEs – and will provide customers who choose to do so the opportunity to transition to those alternatives in this initial

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<sup>21</sup> *Transition Trials Order*, ¶ 59 and n.91.

<sup>22</sup> *Id.*, n.91.

phase of the trial. Similarly, while AT&T will continue to meet its wholesale obligations under Section 251(c) of the Act (including by making UNEs available through the current stage of the trial), AT&T intends eventually not only to withdraw its legacy TDM services but also to retire the TDM electronics and other facilities used to provide those TDM services (and UNEs). At the same time, wholesale customers will have the opportunity to obtain bare copper loops and utilize their own electronics to provide high capacity services to their end user customers — TDM or IP or any other technology the wholesale customer desires to provision.<sup>23</sup> AT&T also is working diligently to develop IP replacement services that it will make available for **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]**. AT&T's objective is to complete those development efforts, as well as those aimed at developing an IP-based alternative to the Local Wholesale Complete product, as soon as possible, although it is likely the final commercial products will not be available until the trials already are underway.

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<sup>23</sup> The *Transition Trials Order* stated that the Commission did not intend to resolve legal and policy questions resulting from the transition in the context of any trials. *Technology Transitions, et al.*, GN Docket No. 13-5, *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-5 at ¶ 8 (rel. Jan. 31, 2014) (*Transition Trials Order*). Consistent with the Commission's intent, AT&T is not seeking to resolve any issues through this application, nor in this phase of the proposed trial, on such issues, including those concerning the extent to which wholesale obligations associated with an ILEC's provision of TDM-based services, such as the required unbundling of high capacity loops or the resale of telecommunications services, apply to IP-based services.

**Conclusion**

For the foregoing reasons, the Commission should approve the trials proposed herein.

/s/ Christopher M Heimann

CHRISTOPHER M HEIMANN

GARY L PHILLIPS

LORI A FINK

Attorneys For:

AT&T Services INC.

1120 20<sup>th</sup> Street, NW

Suite 1000

Washington, D.C. 20036

(202) 457-3058 – phone

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**at&t**

# **Wire Center Trial Operating Plan**

**February 27, 2014**

## **Section 1: Introduction and Overview**

In this document, AT&T has laid out a detailed plan for conducting TDM to all-IP trials in two wire centers. The plan identifies the geographic areas in which AT&T will conduct the trials, the specific TDM-based services that ultimately will be discontinued, the alternative wireless and wireline IP-based alternatives that AT&T will offer, the dates by which AT&T intends to seek Commission approval to grandfather and later sunset such services, and other competitive alternatives available to customers in the test-bed wire centers. It also details AT&T's plans for notifying customers about the transition and informing them of the available service alternatives, and identifies special considerations, such as how AT&T proposes to address public safety, access by persons with disabilities, and other important issues.

As set forth herein, AT&T initially will seek to encourage to the greatest extent possible a voluntary migration of its existing customers for wireline TDM services through customer outreach and education. Subsequently, AT&T plans to seek Commission approval to grandfather existing customers and offer only next generation wireless and wireline IP-based services for new orders. Ultimately, AT&T will seek approval to upgrade existing customers to such alternatives after the Commission has evaluated the results of the first phase of the trials. The dates on which AT&T plans to seek approval to grandfather existing customers, and later to sunset existing wireline TDM-based services, will vary depending on the services at issue and the availability of IP-based alternatives.

In addition to providing detailed information regarding AT&T's plan for conducting the proposed trials, this document explains how AT&T will preserve and protect the enduring principles and values articulated by the Commission in its order authorizing the trials.<sup>1</sup> Those values should continue to apply across all platforms and providers as we complete the transition to all-IP networks and services.

AT&T is eager to receive input on its proposed trial plan from the Commission and other interested parties. We look forward to working with all stakeholders to resolve any issues that may arise.

## **Section 2: Statement of Purpose & Scope**

The trials proposed herein have several important objectives. First, the trials are designed to provide a process and forum for identifying and resolving the operational, technical, logistic, and other issues (both known and unforeseen) that could arise when existing TDM-based networks and services are discontinued and the customers remaining on those networks have to transition to next-generation wireless and wireline IP-based alternatives. Identifying and resolving these issues in the context of a limited trial while the TDM network still is in place is

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<sup>1</sup> *Technology Transitions, et al.*, GN Docket No. 13-5, *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-5 at ¶ 23 (rel. Jan. 31, 2014) (*Technology Transition Trials Order*).

critical to ensure that the transition is orderly. Second, the trials are intended to help AT&T (working with policymakers, consumers and other stakeholders) further develop and implement processes for migrating customers (including residential, small and large business, wholesale, and governmental customers) off of traditional TDM services and onto all IP platforms in an efficient manner, with as little disruption as possible. And third, the trials seek to ensure that customers, manufacturers, policymakers, and other stakeholders have sufficient notice regarding any issues raised by the impending transition so that they also have the opportunity to prepare for the time when TDM networks and services no longer are available.

Consistent with these objectives, the trials seek to replicate on a small scale the broader TDM sunset and migration to all-IP networks and services. Although many of the issues posed by the transition are common to all customers, each customer segment (residential, small and large business, government, wholesale) has its own, unique needs and challenges. Consequently, what works well for one segment may not be the best for another. The trials proposed herein thus seek a complete migration of all customers (or as many as possible) to IP-based services in two wire centers. Excluding particular customer segments and/or services (such as dedicated or wholesale services) from the trial will deprive the Commission, consumers, industry and others of important real-world experience needed to prepare for the IP transition.

This application proposes to conduct the trials in a rural wire center in Carbon Hill, AL, and in Kings Point, a suburban wire center in Palm Beach County, FL.<sup>2</sup> AT&T chose these wire centers with an eye towards gaining insights into some of the more difficult issues that likely will be presented by the TDM sunset. For example, Carbon Hill is a sparsely populated wire center located in rural Alabama with particularly challenging economic and geographic characteristics. There are approximately 4,388 living units in the Carbon Hill wire center. Living units include both business and residential locations (even if not currently occupied), as well as business or residential locations currently under construction, and are the units AT&T's network engineers use when designing and building communications networks because each living unit is a separate location that AT&T historically has been required to serve upon request. Of those 4,388 living units to which AT&T currently offers wireline service in Carbon Hill, roughly

**[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent actually subscribe to AT&T's retail wireline services (TDM and IP). This fact underscores that numerous customers already have made the choice to abandon traditional TDM telephone services, and the difficult economics of the existing wireline regulatory regime. Adding to the uncertainty is the fact that, while the Carbon Hill wire center may qualify for funding under the Commission's revised universal service rules, the amount of that funding has yet to be determined — we thus welcome the CAF Phase II trial proposed by the Commission to answer some of these questions.

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<sup>2</sup> The Kings Point serving wire center is located in an unincorporated part of Palm Beach County, west of the City of Delray Beach, FL. For purposes of this plan, we will refer to that serving wire center as the "Kings Point" wire center.



Under AT&T's current plans, we will offer wireline and/or wireless broadband services to [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of the living units in Carbon Hill. Providing broadband services to the [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent is going to be more difficult given the economics of deploying broadband services to those areas. AT&T recognizes that it is responsible for ensuring that these customers will have an alternative available to them prior to discontinuing TDM services, and is, in all events, committed to working with the Commission, policymakers, and other stakeholders to ensure that this happens. But, it is critically important that we, as a nation, engage in a dialog that addresses the geographic and economic challenges of deploying and offering broadband in sparsely populated areas like Carbon Hill. That is precisely why AT&T selected Carbon Hill as one of the trial wire centers so that we and other stakeholders can begin that dialog on how best to resolve this issue while the TDM network remains in place.

Kings Point likewise raises important issues. Although many seniors already have made the transition from traditional wireline telephone services to wireless and wireline IP-based services (often without even knowing they have done so), as a group they have been slower to migrate to these newer technologies. Kings Point has a sizable population of seniors, and thus will provide AT&T, the Commission and other stakeholders insights into any unique challenges the IP transition may pose for seniors, and how best to address them.

To evaluate whether AT&T's plan for transitioning customers (residential, business, wholesale, and government) from TDM to all-IP networks and services will preserve core network values, AT&T proposes to collect and report data about the progress of the trial, IP call quality and network performance, and customer satisfaction with the migration process and the new wireless/IP products.

### **Section 3: Description of Trial Serving Wire Centers**

#### **3.1 OVERVIEW**

AT&T has selected two diverse serving wire centers for the trials: Carbon Hill, Alabama and Kings Point, Florida.<sup>3</sup> The Carbon Hill wire center has a generally rural customer base with a population of 6,594 and 4,388 living units.<sup>4</sup> Of the 4,388 living units to which AT&T offers wireline services in Carbon Hill, [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] currently subscribe to AT&T's retail wireline services (TDM and IP).

<sup>3</sup> Kings Point, Florida is also sometimes referred to as Delray Beach, Florida.

<sup>4</sup> See U.S. Census Bureau, *The 2006-2010 ACS 5-Year Summary File Technical Documentation*, available at [https://assets.nhgis.org/original-data/acs/2010ACS\\_5.pdf](https://assets.nhgis.org/original-data/acs/2010ACS_5.pdf) (2006-2010 ACS Data). Census blocks have been mapped to the wire center boundaries to obtain relevant data for the wire centers. Living units include business, residential, vacant and under-construction locations. Living units are the units network engineers use when designing and building communications networks because each living unit is a separate location that AT&T historically has been required to serve upon request.

The Kings Point wire center serves parts of Palm Beach County west of Delray Beach with a population of 64,218 across 49,712 living units,<sup>5</sup> of which **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent currently subscribe to an AT&T retail wireline service. These two wire centers afford ample opportunity to address industry-wide challenges using a customer-focused approach. See Exhibit A for maps of the wire centers.

### 3.2 WIRE CENTER SUMMARY

| Serving Wire Center   | Carbon Hill, AL   | Kings Point, FL   |
|---|---|---|
| Address   | 308 NW 4 <sup>th</sup> Street,<br>Carbon Hill, Alabama 35549  | 6037 W Atlantic Ave,<br>Delray Beach, Florida 33445     |
| CLLI  | CRHLALNM  | DLBHFLKP  |
| Switch Type   | DMS-100 Remote  | 5ESS  |
| Overview of Area<br>(based on public information)   | Primarily comprised of Western Walker County but includes SE corner of Marion and NE corner of Fayette Counties | Palm Beach County                                       |
|   | City total area is 5.6 sq. miles  | City total area is 15.9 sq. miles                       |
|   | Rural, former mining town   | Coastal city, part of West Palm Beach metropolitan area |
|   | 6,594 people in the wire center   | 64,218 people in the wire center                        |
| Living Units<br>(includes business, residential, vacant lots, and locations under construction) | 4,388 Living Units  | 49,712 Living Units                                     |

<sup>5</sup> See 2006-2010 ACS Data.



### 3.3 GEOGRAPHY

Walker County, Alabama, where most of the Carbon Hill wire center serving area is located, has an area of approximately 790 square miles in the Northwestern part of the state.<sup>6</sup> The average annual rainfall in the city of Carbon Hill is 59.67 inches of rain.<sup>7</sup> Palm Beach County, Florida, where Kings Point is located, has an area of 1,977 square miles on the Southeastern Coast of Florida, in the West Palm Beach metropolitan area.<sup>8</sup> The average annual rainfall is 62.33 inches in the city of Delray Beach.<sup>9</sup> Both areas can experience severe weather including hurricanes or tornados. See Exhibit B for topographical maps.

### 3.4 DEMOGRAPHICS

The population density in the Carbon Hill wire center is 38 per square mile. The population density in the Kings Point wire center is 1,961 per square mile.<sup>10</sup>

| Population Density |             |                  |                           |
|--------------------|-------------|------------------|---------------------------|
|                    | Population  | Area<br>Sq Miles | Population<br>per Sq Mile |
| Carbon Hill, AL    | 6,594       | 172              | 38                        |
| Kings Point, FL    | 64,218      | 32.75            | 1,961                     |
| Alabama            | 4,779,736   | 52,420           | 91                        |
| Florida            | 18,801,310  | 65,758           | 286                       |
| United States      | 308,745,538 | 3,796,742        | 81                        |

Source: U.S. Census Bureau, United States Census 2010, available at <http://www.census.gov/2010census>

In the Carbon Hill wire center, 95 percent of the 6,594 residents are white, and four percent African-American. In the Kings Point wire center, 84 percent of the 64,218 residents are white, seven percent are African-American, and seven percent Hispanic.<sup>11</sup>

<sup>6</sup> United States Census Bureau, State and County Quick Facts (Walker County, Alabama), <http://quickfacts.census.gov/qfd/states/01/01127.html> (visited Feb. 11, 2014).

<sup>7</sup> See *Weatherdb.com*, available at <http://average-rainfall.weatherdb.com/d/d/Alabama> (visited Feb. 9, 2014).

<sup>8</sup> See *Palm Beach County Interesting Facts and Figures*, available at <http://www.pbcgov.com/publicaffairs/facts.htm#Geography> (visited Feb. 9, 2014).

<sup>9</sup> See *Weatherdb.com*, available at <http://forecast.weatherdb.com/l/33445/Delray-Beach-FL> (visited Feb. 9, 2014).

<sup>10</sup> See 2006-2010 ACS Data. To obtain wire center data, AT&T mapped census blocks to wire center boundaries.

<sup>11</sup> See 2006-2010 ACS Data.



|                        | Total  | White alone   | Black or African American alone | American Indian and Alaska Native alone | Asian alone | Native Hawaiian and Other Pacific Islander alone | Some other race alone | Two or more races | Hispanic or Latino |
|------------------------|--------|---------------|---------------------------------|---|-------------|--|-----------------------|-------------------|--------------------|
| <b>Carbon Hill, AL</b> | 6,594  | 6,250<br>95%  | 275<br>4%                       | 2<br>0%                                 | 6<br>0%     | 0<br>0%  | 0<br>0%               | 55<br>1%          | 6<br>0%            |
| <b>Kings Point, FL</b> | 64,218 | 53,715<br>84% | 4,330<br>7%                     | 59<br>0%                                | 1,089<br>2% | 0<br>0%  | 259<br>0%             | 455<br>1%         | 4,311<br>7%        |

Source: U.S. Census Bureau, *The 2006-2010 ACS 5-Year Summary File Technical Documentation*, available at [https://assets.nhgis.org/original-data/acs/2010ACS\\_5.pdf](https://assets.nhgis.org/original-data/acs/2010ACS_5.pdf).

In the Carbon Hill wire center, approximately 99 percent of the population speaks English only. In the Kings Point wire center, approximately 81 percent speaks English only and six percent speak Spanish.<sup>12</sup>

|                 |              |         |       | Spanish - No one 14 and over speaks English only or speaks English very well | Spanish - At least one person 14 and over speaks English only or speaks English very well | Other Indo-European - No one 14 and over speaks English only or speaks English very well | Other Indo-European - At least one person 14 and over speaks English only or speaks English very well | Asian and Pacific - No one 14 and over speaks English only or speaks English very well | Asian and Pacific - At least one person 14 and over speaks English only or speaks English very well | Other - No one 14 and over speaks English only or speaks English very well | Other - At least one person 14 and over speaks English only or speaks English very well |     |     |     |
|-----------------|--------------|---------|-------|--|---|--|---|--|---|--|---|-----|-----|-----|
| Total           | English only | Spanish |       |  | Other Indo-European languages   |  | Asian and Pacific Island languages  |  | Other languages   |  |   |     |     |     |
| Carbon Hill, AL | 6,594        | 6,556   | 27    | -  | 27  | 9  | 9   | 2  | 2   | -  | -   |     |     |     |
|                 |              | 99.42%  | 0.41% |  |   | 0.14%  |   | 0.04%  |   | 0.00%  |   |     |     |     |
| Kings Pt, FL    | 64,218       | 52,186  | 4,044 | 1,149  | 2,895   | 6,698  | 2,055   | 4,643  | 603   | 157  | 445   | 686 | 260 | 426 |
|                 |              | 81.26%  | 6.30% |  |   | 10.43%   |   | 0.94%  |   |  | 1.07%   |     |     |     |

Source: U.S. Census Bureau, *The 2006-2010 ACS 5-Year Summary File Technical Documentation*, available at [https://assets.nhgis.org/original-data/acs/2010ACS\\_5.pdf](https://assets.nhgis.org/original-data/acs/2010ACS_5.pdf).

In the Carbon Hill wire center, the single largest age group is 22 to 49 year olds, with 38 percent of the population 50 years old or older. In the Kings Point wire center, 70 percent of the population are 50 years of age or older, although the single largest age group (19%) is 22 to 49 year olds.<sup>13</sup>

<sup>12</sup> See 2006-2010 ACS Data. To obtain wire center data, AT&T mapped census blocks to wire center boundaries.

<sup>13</sup> See 2006-2010 ACS Data. To obtain wire center data, AT&T mapped census blocks to wire center boundaries.

|                 | Age Number of People<br>(Men and Women) |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 |                 |                   |
|-----------------|---|------------------|--------------------|------------------|------------------|-----------------|-----------------|------------------|-----------------|-----------------|-----------------|-----------------|-------------------|
|                 | Under 18                                | 18 to 21         | 22 to 49           | 50 to 54         | 55 to 59         | 60 and 61       | 62 to 64        | 65 to 69         | 70 to 74        | 75 to 79        | 80 to 84        | 85 and over     | 50 and over       |
| Carbon Hill, AL | 1,524<br>23%                            | 291<br>4%        | 2,296<br>35%       | 542<br>8%        | 293<br>4%        | 206<br>3%       | 311<br>5%       | 301<br>5%        | 324<br>5%       | 242<br>4%       | 167<br>3%       | 97<br>1%        | 2,483<br>38%      |
|                 |   |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 | 6,594           |                   |
| Kings Point, FL | 6,277<br>10%                            | 964<br>2%        | 12,066<br>19%      | 3,024<br>5%      | 4,130<br>6%      | 1,776<br>3%     | 3,265<br>5%     | 5,164<br>8%      | 6,297<br>10%    | 7,886<br>12%    | 7,398<br>12%    | 5,970<br>9%     | 44,911<br>70%     |
|                 |   |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 | 64,218          |                   |
| Alabama         | 1,132,303<br>24%                        | 284,216<br>6%    | 1,766,242<br>37%   | 337,627<br>7%    | 301,166<br>6%    | 113,367<br>2%   | 142,513<br>3%   | 197,198<br>4%    | 156,036<br>3%   | 120,449<br>3%   | 87,698<br>2%    | 73,836<br>2%    | 1,529,890<br>32%  |
|                 |   |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 | 4,712,651       |                   |
| Florida         | 4,013,090<br>22%                        | 1,017,224<br>5%  | 6,837,598<br>37%   | 1,283,619<br>7%  | 1,162,393<br>6%  | 447,540<br>2%   | 616,051<br>3%   | 897,204<br>5%    | 735,810<br>4%   | 615,886<br>3%   | 472,654<br>3%   | 412,551<br>2%   | 6,643,708<br>36%  |
|                 |   |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 | 18,511,620      |                   |
| United States   | 74,033,117<br>24%                       | 17,940,909<br>6% | 117,432,247<br>39% | 21,532,191<br>7% | 18,817,728<br>6% | 6,776,873<br>2% | 8,682,794<br>3% | 11,518,053<br>4% | 8,975,414<br>3% | 7,358,170<br>2% | 5,721,633<br>2% | 5,176,143<br>2% | 94,558,999<br>31% |
|                 |   |                  |                    |                  |                  |                 |                 |                  |                 |                 |                 | 303,965,272     |                   |

Source: U.S. Census Bureau, *The 2006-2010 ACS 5-Year Summary File Technical Documentation*, available at [https://assets.nhgis.org/original-data/acs/2010ACS\\_5.pdf](https://assets.nhgis.org/original-data/acs/2010ACS_5.pdf)

In the Carbon Hill wire center, 21 percent of households have income below the poverty line, compared to 9 percent in the Kings Point wire center.<sup>14</sup>

|                 | Percent of HHs with Income<br>Below Poverty Level |            |
|-----------------|---|------------|
|                 | HHs (%)   | HHs        |
| Carbon Hill, AL | 21%   | 579        |
| Kings Point, FL | 9%  | 2,955      |
| Alabama         | 17%   | 308,181    |
| Florida         | 13%   | 923,394    |
| United States   | 13%   | 14,865,322 |

Source: U.S. Census Bureau, *The 2006-2010 ACS 5-Year Summary File Technical Documentation*, available at [https://assets.nhgis.org/original-data/acs/2010ACS\\_5.pdf](https://assets.nhgis.org/original-data/acs/2010ACS_5.pdf).

<sup>14</sup> See *2006-2010 ACS Data*. Through the American Community Survey, the US Census Bureau estimates the number of households in poverty by Census Block Group (CBG). The standard for poverty varies as a function of household size. To obtain wire center data, AT&T mapped the Census Blocks to the wire center boundaries, based on the assumption that the Census Blocks that make up the wire center have the same poverty characteristics as the Census Block Group.



### 3.5 WIRE CENTER PROFILES

During the course of the trials, AT&T plans to use a combination of IP-based wireline and wireless service solutions as replacements for legacy TDM-based services in the Carbon Hill and Kings Point wire centers.<sup>15</sup> The wireline service solutions will be provided by AT&T Southeast and the wireless service solutions will be provided by AT&T Mobility. As part of planning for the trials, AT&T has performed a careful analysis of the availability of wireline and wireless IP-based alternatives to living units in these wire centers. The results of that analysis are set forth in the table below.<sup>16</sup>

| End of Year 2015    |                       |                   |             |                                   |             |                                 |             |
|---------------------|-----------------------|-------------------|-------------|-----------------------------------|-------------|---------------------------------|-------------|
| Serving Wire Center | Total Wire Center LUs | IP Wireline Green |             | IP Wireline Red/IP Wireless Green |             | IP Wireline Red/IP Wireless Red |             |
|                     |                       | LUs               | % Total LUs | LUs                               | % Total LUs | LUs                             | % Total LUs |
| Carbon Hill         | 4,388                 |                   |             |                                   |             |                                 |             |
| Kings Point         | 49,712                |                   |             |                                   |             |                                 |             |

3.5.1. *Carbon Hill.* As of December 2013, AT&T provides wireline retail services to [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]<sup>17</sup> in the Carbon Hill wire center out of a total of 4,388 living units in the wire center to which it offers wireline services. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of the Carbon Hill living units will have a wireline IP-based alternative to TDM-based services available from AT&T by the end of 2015. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent will have at least one IP-based alternative available—wireline, wireless or both. AT&T has not yet found a viable replacement service for the [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of living units, and still is considering its options for those living units. AT&T recognizes that it is responsible for ensuring that these customers will have an alternative available to them prior to discontinuing TDM services, and is, in all events, committed to working with the Commission, policymakers, and other stakeholders to ensure that this happens.

<sup>15</sup> See Section 4.

<sup>16</sup> In the table, living units are listed as “green” for a particular service if that service will be available to those locations from AT&T by the end of 2015 and as “red” if the service will be unavailable. Living units included in the “IP Wireline Green” category will have available a wireline IP alternative to TDM-based services. Approximately [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of the Carbon Hill living units and all of the Kings Point living units in the Wireline IP Green category will also have a wireless IP broadband service alternative. Living units in the “Wireline IP Red/Wireless IP Green” will have a wireless IP broadband alternative, but not a wireline IP broadband alternative. The living units in the “IP Wireline Red and IP Wireless Red” category will not have an IP-based alternative available from AT&T. AT&T continues to consider options for these living units.

<sup>17</sup> Business customers include small business, enterprise, affiliates and unidentified business customers. This analysis does not include wholesale customers. See Section 6.3.



3.5.2. *Kings Point.* As of December 2013, AT&T provides wireline retail services to [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] in the Kings Point wire center out of a total of 49,712 living units in the wire center. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent of these living units will have a wireline IP-based alternative to TDM-based services available from AT&T by the end of 2015. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] percent will have at least one IP-based alternative available—wireline, wireless or both.

### 3.6. SCHOOLS AND LIBRARIES.<sup>18</sup>

Among AT&T's customers is the Walker County, Alabama School System, which has one public school location in the Carbon Hill wire center. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]. In the Kings Point wire center, there is one public school and one private school. [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE].

In addition, AT&T has identified one library in Carbon Hill—the Carbon Hill City Library—and two libraries in Kings Point—the Hagen Ranch Road Branch of the Palm Beach County Library System and the Donald B. Gordon Memorial Library of the Morikami Museum and Japanese Gardens. All three libraries are [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE].

### 3.7. COMPETITORS.

Among others, AT&T has identified cable, wireless and satellite providers that compete aggressively and head-to-head with AT&T for both business and residential, voice and broadband customers in the Carbon Hill and Kings Point wire centers. In Carbon Hill, Charter Communications, Verizon LTE, Sprint 3G, T-Mobile 3G, HughesNet, Dish Network, and DirecTV provide alternatives to consumers and businesses for voice and broadband services. Among others, in Kings Point, Comcast Communications, Verizon LTE, Sprint 3G, T-Mobile 3G, HughesNet, Dish Network, and DirecTV provide alternatives to consumers and businesses for voice and broadband services. The maps in Exhibit C show the coverage of these competitors in each wire center.

### 3.8. STATE, TRIBAL, AND OTHER GOVERNMENT ENTITIES.

AT&T does not expect to need any authorization from other federal, State, Tribal or other governmental entities to conduct the trials in Kings Point, Florida or Carbon Hill, Alabama.<sup>19</sup> There are no Tribal governments in the trial areas. Although no authorizations will be required,

<sup>18</sup> Any transition of schools and libraries to IP-based services will be done a manner fully compliant with the E-Rate program and obligations.

<sup>19</sup> To the extent that AT&T seeks to withdraw intrastate switched and/or special access services in Carbon Hill, it will have to obtain approval from the Alabama PSC. AT&T will comply with all requirements to do so. To the extent necessary AT&T will request ETC relief in both wire centers. See section 6.2.2.

AT&T has a comprehensive plan to inform, educate and coordinate with government entities in the trial areas.<sup>20</sup> AT&T requests no preemption by the FCC of any state or local law to conduct the trials at this time. In the course of the trials, AT&T will comply with all applicable State laws and regulations.<sup>21</sup>

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<sup>20</sup> See section 5.

<sup>21</sup> AT&T's VoIP and wireless services meet or exceed all current federal, state, and local requirements for 911 emergency services. See also section 6.1.

| State & Local Government Contacts |   |   |
|-----------------------------------|---|---|
|                                   | Carbon Hill Wire Center   | Kings Point Wire Center   |
| State                             | Dr. Robert Bentley<br>Governor – State of Alabama<br>600 Dexter Avenue<br>N-104<br>Montgomery, Alabama 36130  | Office of Governor Rick Scott<br>State of Florida<br>The Capitol<br>400 S. Monroe St.<br>Tallahassee, FL 32399-0001<br><br>Department of Agriculture and<br>Consumer Affairs<br>Adam Putnam, Commissioner<br>The Capitol<br>400 S. Monroe St.<br>Tallahassee, FL 32399-0800 |
| Public Utility<br>Commission      | Alabama Public Service<br>Commission<br>Hon. Walter Thomas, Secretary<br>Suite 850<br>100 North Union Street<br>Montgomery, AL 36104  | Florida Public Service<br>Commission<br>Office of Commission Clerk<br>Carlotta S. Stauffer, Commission<br>Clerk<br>2540 Shumard Oak Blvd.<br>Tallahassee, FL 32399-0850   |
| County                            | Fayette County Commission<br>103 1st Avenue NW, Suite 2<br>Fayette, AL 35555<br><br>Marion County Commission<br>P. O. Box 460<br>Hamilton, AL 35570<br><br>Walker County Commission<br>P. O. Box 1447<br>Jasper, AL 35502-1447  | Palm Beach County<br>301 N. Olive Avenue<br>West Palm Beach, FL 33401   |
| City                              | Town of Carbon Hill<br>P. O. Box 519<br>Carbon Hill, AL 35549<br><br>Town of Eldridge<br>P. O. Box 99<br>Eldridge, AL 35554<br><br>Town of Kansas<br>P. O. Box 186<br>Kansas, AL 35573  | City of Delray Beach<br>City Hall<br>100 NW 1st Avenue<br>Delray Beach, Florida 33444   |
| 911 Authorities                   | Fayette County E-911<br>Attn: Treasa Blake, Director<br>118 1st Ave NE<br>Fayette, AL 35555<br>Phone: 205 932-1911<br><br>Marion County E 911<br>PO Box 1744 Linda Winters,<br>Director<br>Hamilton, AL 35570<br>Phone: 205.921-0911<br><br>Walker County E9-1-1 District<br>302 15th St NE Attn: Roger D.<br>Wilson, Director<br>Jasper, AL 35504<br>Phone: 205-221-7911 | Palm Beach County, FL.<br>Mr. Charles Spalding<br><a href="mailto:cspalding@pbcgov.org">cspalding@pbcgov.org</a><br>Department of Public Safety<br>20 S Military Trail<br>West Palm Beach, FL 33415<br>Phone: 561 712-6339  |



## Section 4: Technical Parameters and Timeline

AT&T's proposed trials contemplate replacing the vast majority of the TDM-based services in the trial wire centers over the next three years. AT&T identifies below each TDM-based service it currently offers in the trial wire centers and the wireless and wireline IP-based alternatives that AT&T will offer in the trial wire centers, along with a timeline setting forth the dates on which AT&T proposes to implement each stage of the trials to the extent it receives the necessary approvals to do so.<sup>22</sup> Many of the TDM-based services listed herein are intrastate services. Nonetheless, AT&T has included all of the TDM services that AT&T proposes to include in the trials regardless of their regulatory jurisdiction to ensure the Commission and other interested parties have a comprehensive view of the implications of the IP transition.<sup>23</sup>

### 4.1. CONSUMER SERVICES

AT&T proposes to include in the trial all of its consumer TDM-based voice and internet access transport services, and to offer the following services in place of those TDM services: AT&T's U-verse Voice service, AT&T's U-verse High Speed Internet services, and AT&T's Wireless Home Phone service and Wireless Home Phone and Internet service.

Customers within AT&T's wireline IP network footprint have access to AT&T's U-verse® Voice and High Speed Internet services, which provide next-generation voice calling features and high-speed broadband Internet access. More than half of AT&T's U-verse broadband base has downstream speeds of 12MB or higher and we can deliver speeds of up to 45MB to approximately two-thirds of our U-verse video customers. Consumers in AT&T's wireless footprint also will be able to purchase one of AT&T's CMRS services (including AT&T's Wireless Home Phone and Wireless Home Phone and Internet services) in place of traditional, TDM-based voice telephone services. AT&T's Wireless Home Phone and Wireless Home Phone and Internet services include nationwide calling with enhanced calling features. The wireless Internet component of Wireless Home Phone and Internet provides broadband Internet speeds capable of downstream speeds between 5-12 Mbps. AT&T's LTE network is consistently recognized as the fastest, most reliable LTE network in the nation.

AT&T has included in Exhibit E, Product Data sheets for each consumer service that AT&T proposes to grandfather, and ultimately sunset, in the trial wire centers. The Product Data

<sup>22</sup> Exhibit D.

<sup>23</sup> When AT&T is ready to grandfather its TDM-based services, AT&T will file Section 214 Discontinuance Applications for the TDM-based services that it provides subject to the FCC's interstate jurisdiction. AT&T will follow applicable intrastate regulatory requirements to grandfather and/or discontinue the intrastate TDM-based services identified in this plan.

sheets provide the following information concerning each service: current customer counts for the service, proposed grandfather and sunset dates, proposed customer notification dates, AT&T's replacement products, and the competitive presence in the trial wire centers.

#### 4.2. BUSINESS SERVICES

AT&T also proposes to transition its current retail business customers in the trial wire centers from TDM-based voice and data services to wireless and wireline IP-based services over the next three years. AT&T will offer business customers within its wireline IP network footprint a variety of IP-based business-class voice services that include next generation calling features, such as U-verse® Business Voice, AT&T Voice DNA® and IP Flexible Reach, in place of legacy TDM services, such as BellSouth Centrex and Business Access line services. AT&T also offers IP-based Internet access and data services in the Trial Wire Centers, including U-verse® High Speed Internet-Business Edition, and a variety of business-class Ethernet services that deliver extremely reliable service at ultra-fast speeds. In addition, AT&T is in the process of developing a wireless business phone product, which (like Wireless Home Phone) will enable business customers to use their existing CPE to communicate over AT&T's wireless network. AT&T's Wireless Business Phone service include nationwide calling with enhanced calling features designed for business and wireless Internet access using AT&T's 4G network.

AT&T has included in Exhibit E, Product Data sheets for each business service that AT&T proposes to grandfather, and ultimately sunset, in the trial wire centers. The Product Data sheets provide the following information concerning each service: current customer counts for the service, proposed grandfather and sunset dates, proposed customer notification dates, AT&T's replacement products, and the competitive presence in the trial wire centers.

#### 4.3. DEVICE AND SERVICE APPLICATION COMPATIBILITY

As illustrated in the chart below, the wireless and wireline IP-based services that AT&T will offer in place of traditional TDM-based services will support the vast majority of the devices and applications enumerated in Appendix B of the *Transitions Trial Order*. However, AT&T does not currently plan to support certain applications with rapidly declining market demand or applications that are based on outdated technology such as DVR services, elevator phones, third party pay per call, dial around calls, and operator services functions (live operators and collect calling). The chart identifies whether particular applications or devices currently supported over TDM also are (or will be) supported over AT&T's wireless and wireline IP-based replacement services (we also identify the date by which AT&T expects to support applications and devices still under development).



| Application/Devices                                 | TDM Voice | U-verse Voice  | Wireless Home/Business Phone | Wireless Home/Business Phone with Internet |
|---|-----------|----------------|------------------------------|--|
| E-911 with Address                                  | Y         | Y              | Y <sup>a</sup>               | Y <sup>b</sup>                             |
| Alarm Monitoring                                    | Y         | Y              | Y <sup>c</sup>               | Y <sup>d</sup>                             |
| Medical Alert                                       | Y         | Y              | Y <sup>e</sup>               | Y <sup>f</sup>                             |
| 411   | Y         | Y              | Y                            | Y  |
| DVR Services <sup>24</sup>                          | Y         | Y              | N                            | N  |
| Credit Card/Merchant Services                       | Y         | Y              | Y <sup>g</sup>               | Y <sup>h</sup>                             |
| 800 # Service <sup>25</sup>                         | Y         | N              | Y <sup>i</sup>               | Y <sup>j</sup>                             |
| 3 <sup>rd</sup> Party Pay per Call (500, 976, etc.) | Y         | N              | N                            | N  |
| Calling Card calls using IVR (8xx platforms)        | Y         | Y              | Y                            | Y  |
| Dial-around calls                                   | Y         | N              | N                            | N  |
| Abbreviated Dialing Codes (N11) <sup>26</sup>       | Y         | Y              | Y                            | Y  |
| Live Operator via "0"                               | Y         | N              | N                            | N  |
| Collect Calls                                       | Y         | N <sup>k</sup> | N <sup>l</sup>               | N <sup>m</sup>                             |
| Correctional Facility Ankle Bracelets               | Y         | Y              | N                            | N  |
| TTY-Assistive Technology                            | Y         | Y              | Y <sup>n</sup>               | Y <sup>o</sup>                             |
| Elevator Phone Service <sup>27</sup>                | Y         | N              | N                            | N  |

<sup>24</sup> DVR compatibility should be a relatively minor concern as the DVRs provided by video content providers no longer require the use of TDM-voice service or a separate internet connection to operate. DVRs that are purchased without a video service may be unable to utilize the full functionality of the DVR without a TDM-voice connection; however, AT&T believes this to be a very small and rapidly declining user group.

<sup>25</sup> 800 number service permits 800 calls that originate from diverse geographic locations within the U.S. to terminate onto the subscribing customer's local exchange service lines.

<sup>26</sup> AT&T's services support the abbreviated dialing codes that are have been activated in the specific geographic area. For example, in Carbon Hill, the 311 and 511 codes are not active or operational on AT&T's services.

<sup>27</sup> Based on AT&T's initial research, there are no elevator phones in the trial wire centers.



**Notes a-h:** Currently, Wireless Home Phone and Wireless Home Phone and Internet, which are CMRS, comply with the Commission's existing 911 requirements for CMRS, and do not provide E-911 with street address. Nor does Wireless Home Phone and Wireless Home Phone and Internet currently support alarm monitoring, medical alert and credit card validation applications. However, AT&T currently is developing enhancements that will provide all of these applications (*i.e.*, E-911 with street address, as well as alarm monitoring, medical alert and credit card applications), which we plan to introduce in the **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]**. AT&T knows that these applications are vitally important to its customers and is committed to supporting these applications before AT&T takes any action to grandfather or discontinue its TDM-based voice services. The E-911 enhancement for Wireless Home Phone and Wireless Home Phone and Internet will deliver an address when the device is stationary. When the device is in motion, it will deliver a location generated by GPS like any other CMRS device and service.

**Notes i-j:** 800 number service is not supported by Wireless Home Phone/Wireless Home Phone and Internet for consumer customers but will be included in AT&T's wireless business voice services.

**Notes k-m:** U-verse Voice, Wireless Home Phone and Wireless Home Phone and Internet do not support collect calling, but some 3<sup>rd</sup> party systems have applications that facilitate collect calls from correctional institutions. These 3<sup>rd</sup> party applications will function with AT&T's services.

**Notes n-o:** TTY compatibility and accessibility for Wireless Home Phone and Wireless Home Phone and Internet services is being carefully assessed. AT&T is committed to supporting this functionality and will not take any action to grandfather or discontinue service to a customer with assistive technology that is known to be incompatible with AT&T's replacement services.

#### 4.4. SWITCHED ACCESS SERVICES

AT&T plans to discontinue its ILEC-provided TDM-based interstate and intrastate switched access services in the trial wire centers as well. These services are used to originate and terminate interexchange calls. As discussed above, AT&T intends to offer wireless and wireline IP-based services in place of traditional TDM voice services in the trial wire centers. Both are all-distance services with unlimited domestic local and long distance calling. As a consequence, customers that transition to those services will have no need to purchase a stand-alone interexchange service that would require originating access, and thus neither offers equal access functionalities. Currently, AT&T's affiliate, AT&T Corp., provides TDM interconnection for the exchange of traffic to or from AT&T's VoIP customers primarily through indirect interconnection arrangements. For customers that transition to AT&T VoIP services, AT&T will exchange traffic to or from end users on another provider's network through that provider's existing interconnection arrangement with AT&T's access tandem, which then routes

traffic to and from AT&T Corp. — just as AT&T does today for its existing VoIP customers. Likewise, for customers that transition to an AT&T wireless service, AT&T will exchange traffic to or from end users on another provider's network through that provider's existing interconnection arrangement with AT&T's access tandem, which then routes traffic to and from AT&T Mobility. To the extent a provider has direct interconnection arrangements with AT&T Corp. or AT&T Mobility, the traffic will be exchanged with AT&T over the existing interconnection arrangements designated for each type of traffic. The dates on which AT&T will grandfather and sunset its ILEC-provided interstate and intrastate switched access services depend on when AT&T grandfathers and sunsets the underlying consumer and business voice services. Accordingly, AT&T will not take any steps to grandfather or sunset switched access services until the replacement voice services are available as discussed above.

AT&T has included in Exhibit E, Product Data sheets for each interstate and intrastate switched access service that AT&T proposes to grandfather, and ultimately sunset, in the trial wire centers. The Product Data sheets provide the following information concerning each service: current customer counts for the service, proposed grandfather and sunset dates, and proposed customer notification dates.

#### 4.5. PRIVATE LINE AND SPECIAL ACCESS SERVICES

AT&T also intends to grandfather, and ultimately withdraw, intrastate private line and interstate and intrastate TDM-based special access services in the trial wire centers. AT&T currently provides the following categories of TDM-based special access and private line services in the trial wire centers: DS-0, DS-1, DS-3 and OC-N speeds, shared SONET service and Dedicated Ring service. AT&T Switched Ethernet (ASE) service and several new services that are in development, will replace those TDM-based private line and special access services in the trial wire centers.

AT&T has included in Exhibit E, Product Data sheets for each special access service that AT&T proposes to grandfather, and ultimately sunset, in the trial wire centers.<sup>28</sup>

### Section 5: Customer Notice and Outreach

AT&T shares the Commission's view that "we can only achieve our goal of advancing technology transitions if customers are fully educated and informed."<sup>29</sup> Thus, customer outreach and education are critical elements of our plan for the trials, and will be essential to their success. Consequently, we have developed detailed and extensive plans both to notify specific customers

<sup>28</sup> AT&T understands that special access services may have an end-point that is located outside of the trial wire center. AT&T will manage the transition of these services on a case by case basis with the applicable customers in the trial wire centers.

<sup>29</sup> *Technology Transition Trials Orders* at ¶ 69.



about the transition and its impact on them, and to educate the customers, community leaders and other stakeholders about the transition and trial in the trial wire centers and more broadly. In the latter effort, we will tailor our outreach efforts to ensure that certain populations with unique needs (including seniors and persons with disabilities) have the information they need regarding the trials and transition, and what they mean for those particular groups.

#### 5.1. CUSTOMER OUTREACH.

AT&T has developed detailed customer outreach campaigns in Carbon Hill and Kings Point, which will include, *inter alia*, briefing state and local leaders, briefing the press, posts to Twitter, direct mailings to customers, community meetings, and launching microsites on the web where customers can obtain information about the trials. Our specific plans for each wire center are set forth below. In addition to the plans outlined here, AT&T has developed targeted outreach efforts to inform disabled persons, seniors, and others with unique needs regarding the trials, which are described in section 6.2.1. below.

##### 5.1.1. Carbon Hill.

AT&T will take the following steps to inform customers, community leaders and others in Carbon Hill of the trial:

- AT&T will send direct mail to all consumer and small business customers in the Carbon Hill wire center that currently purchase wireline TDM-based services notifying them that: (1) AT&T has selected their community as the location for a trial; (2) the trial will be overseen by the FCC; (3) AT&T will host meetings and town halls to provide more information about the trial, and (4) providing a 1-800 telephone number and website where they can obtain more information. These letters will be mailed so that they arrive on or shortly after February 27.<sup>30</sup>
- AT&T will post a blog, post a Twitter communication, issue a press release, and host a press conference for national media on the day after AT&T files this plan with the Commission.
- AT&T's state external affairs team will begin briefing state and local leaders during the week we file the plan.
- AT&T will distribute internal and external e-newsletters to its employees and customers in Carbon Hill.
- AT&T will activate a microsite to provide information regarding the trial.

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<sup>30</sup> See Exhibit F.



In the weeks following the filing of this detailed plan, AT&T will engage in the following additional outreach measures:

- AT&T will hold community events at different locations around Carbon Hill to provide customers information about the trial and transition. AT&T will send direct mail to its customers and run informational advertisements in local media to notify interested parties of these meetings. The following are the initial dates and locations of such events:
  - Thursday, March 6 – Carbon Hill Community Center
  - Saturday, March 8 – American Legion, Post 101
  - Tuesday, March 11 – Carbon Hill Community Center
  - Thursday, March 13 – Carbon Hill Community Center
- AT&T tentatively plans to hold the following additional meetings to inform interested parties of the trial and its implications:
  - April: Meeting with first responders (fire, police, EMS)
  - May: Open meeting for customers with questions or concerns.
  - June: Meeting with local religious leaders. Possible additional meetings in each of their churches.
  - July: Meeting with focus on seniors and senior tech training.
  - August: Meeting with local educators (teachers, principals, librarians)
  - September: Meeting with economic developers (local business owners/managers)
  - October: Meeting focused on introducing new technologies
  - November: Open meeting for customers with questions or concerns.
  - December: Meeting with health care providers

#### *5.1.2. Kings Point.*

AT&T will take the following steps to inform customers, community leaders and others in Kings Point of the trial:

- AT&T will send direct mail to all consumer and small business customers in the Kings Point wire center that currently purchase wireline TDM-based services notifying

them that: (1) AT&T has selected their community as the location for a trial; (2) the trial will be overseen by the FCC; (3) AT&T will host meetings and town halls to provide more information about the trial, and (4) providing a telephone number and website where they can obtain more information. These letters will be mailed so that they arrive on or shortly after February 27.<sup>31</sup>

- AT&T will post a blog, issue a press release to the South Florida Business Journal and the AT&T State President for Florida will provide an interview to the Fort Lauderdale Sun Sentinel on the day after AT&T files this plan with the Commission.
- During the week of the filing, AT&T will hold press briefings with local media, including the daily for the West Delray Beach area and the Ft. Lauderdale Sun Sentinel. We also will provide press releases to the South Florida Business Journal and the Palm Beach Post. AT&T also will post a communication on Twitter, and post a blog regarding the trial.
- AT&T's state external affairs team will begin briefing state and local leaders immediately after the filing.
- AT&T will distribute internal and external e-newsletters to its employees and customers in Kings Point.
- AT&T will activate a microsite to provide information regarding the trial.

In the weeks following the filing of this detailed plan, AT&T will engage in the following additional outreach measures:

- AT&T will hold community events at different locations around Kings Point to provide customers information about the trial and transition. AT&T will send direct mail to its customers and run informational advertisements in local media to notify interested parties of these meetings. These events will include meetings with local senior groups, local churches and synagogues, the local chamber of commerce and economic development agencies, first responders, educators and healthcare providers. These include:
  - Two to four Listening Tour Meetings with Key Stakeholders and AT&T's state president for Florida within the first 30 days after filing this plan.
  - Two to four Town Hall events within the first 45 days, depending on community participation and interest.

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<sup>31</sup> See Exhibit F.

- AT&T will hold several technology training events within the first 90 days to demonstrate how to use the IP-based replacement products AT&T will offer in Kings Point.

## 5.2. CUSTOMER NOTICE.

In addition to the customer outreach and education efforts described above, AT&T will send its residential customers multiple notices regarding AT&T's plans to grandfather and ultimately sunset existing TDM-based services. These notices will identify the specific TDM-based services that AT&T plans to grandfather (and later sunset), the date on which AT&T proposes to grandfather or sunset such services, the IP-based alternative service(s) available from AT&T, a description of any difference in features or functions between such TDM-based services and their IP-based replacements, information regarding the pricing of the IP-based alternative services, information about how to contact AT&T for more information or to provide AT&T feedback, a statement that the trials are being conducted under Commission oversight, and information about how to contact the Commission with any concerns. AT&T will provide these notices through direct mail, email, door hangers, and bill messages throughout the trial. In addition, when AT&T seeks approval to grandfather interstate TDM-based services, its customer notices for these services will include the information required by section 63.71 of the Commission's rules.

AT&T will notify business customers (both wholesale and retail) regarding the trials through its business customer account teams and sales agents, using the customers' preferred method of contact, which might include email, telephone calls, personal visits, or some combination thereof. AT&T will inform such customers regarding its plans to grandfather and/or sunset existing TDM-based services and the IP-based wireline and wireless alternatives (including those alternatives' features, capabilities and options) available to them, and assist them in developing a migration plan. AT&T will mail such customers section 214 customer notification letters before it proposes to grandfather any business services, and before it proposes to sunset any such services. In addition, AT&T customer account and sales teams will contact each business customer semiannually to provide them information regarding the trials and to consult with them regarding their migration plans.

## **Section 6: Protecting Enduring Values**

### 6.1. PUBLIC SAFETY & NATIONAL SECURITY

AT&T shares the Commission's commitment to protecting public safety and national security. AT&T is dedicated to making sure that, during the trials proposed herein, as well as during the ultimate transition from TDM-based networks to all-IP networks and services, the existing level of public safety and national security services is maintained.



### 6.1.1. Preserving 911/E911 and Next Generation 911 Capabilities

As a condition to approving any Trial Proposal, the Commission has made it clear that services provided by trial participants must “in no way diminish consumer access to 911/E911 emergency services” and that Public Safety Answering Points (PSAPs) must “continue to receive all consumer, phone identifying, and automatically-provided street address location information associated with a 911/E911 call, consistent with existing Commission rules and regulation.”<sup>32</sup> Moreover, the Commission has informed potential participants that PSAPs must be “provided with at least the same level of network access, resiliency, redundancy, and security that they enjoy under agreements and tariffs currently framing the legacy emergency network.”<sup>33</sup> As explained below, AT&T’s Trial Proposal will meet these conditions.

Today, AT&T uses its IP network to offer interconnected Voice over IP services (AT&T VoIP services) in its ILEC regions.<sup>34</sup> AT&T also already is providing CMRS service (including its Wireless Home Phone service) in its service territory and across the country. During the trial, AT&T intends to offer its existing VoIP and CMRS services as replacements for TDM-based voice services in the trial wire centers (in some areas, AT&T will offer only a wireless replacement service).<sup>35</sup> Hence, AT&T is not proposing to offer *experimental services* as legacy replacements, rather AT&T is proposing to expand the reach of its existing IP services, which include the ability to provide appropriate E911 access, and an appropriate wireless service, where available.

#### a. VoIP Services

AT&T’s U-verse Voice residential services currently are geographically fixed to the consumer’s service address. Likewise, business customers can buy fixed VoIP services, but customers may augment these services to include a nomadic feature.<sup>36</sup> This fixed aspect allows AT&T VoIP service to emulate the E911 experience enjoyed by users of traditional telephone service.<sup>37</sup> When an AT&T VoIP customer dials 9-1-1, his or her call is routed to the service’s network gateway where the call is converted from IP to TDM and delivered to the legacy telephone network. Once on the Public Switched Telephone Network (PSTN), the 9-1-1 call hits

<sup>32</sup> *Technology Transition Trials Order*, ¶ 39.

<sup>33</sup> *Id.*, ¶ 39.

<sup>34</sup> Some of these VoIP services are sold as a bundled offering of U-verse High-Speed Internet access (HSIA), U-verse TV (IPTV), and U-verse Voice (VoIP) or, alternatively, just HSIA and VoIP. AT&T relies on different network architectures, such as its VDSL and its IP-DSLAM architectures, to provide these services. Residential or consumer service is referred to as “CVoIP,” while the business service is referred to as “BVoIP.”

<sup>35</sup> See discussion below on AT&T’s wireless service.

<sup>36</sup> AT&T offers non-fixed or nomadic VoIP applications that expand the reach of some business VoIP services. For those services, AT&T adheres to the Commission’s 911/E911 regulations and directives. By way of example, for nomadic interconnected VoIP services, the PSAP is provided with the caller’s Registered Location, which is initially obtained by the service provider and later, if the subscriber changes his or her physical location, must be updated by the subscriber. See 47 C.F.R. § 9.3.

<sup>37</sup> AT&T VoIP is presently only offered in or provisioned in areas in which the PSAP is Phase I or Phase II capable.

the selective router switch, which queries the Selective Router Database (SRDB) and the Master Street Address Guide (MSAG) using the caller's originating telephone number to match the call to the appropriate PSAP's Emergency Service Number (ESN). The 9-1-1 call is then routed to the PSAP using the ESN. As is the case with traditional TDM-based calls, AT&T VoIP services provide the PSAP with both the user's call-back number (automatic number identification or ANI) and the automatic location information (ALI) consistent with existing Commission rules and regulation. For AT&T VoIP services, ALI information also is verified with the MSAG database. Consequently, AT&T VoIP services already provide a reliable and accurate E911 service on par with TDM-based 9-1-1 calls.<sup>38</sup>

Some PSAPs are starting the transition to Next Generation 911 service (NG911), which will provide PSAPs with enhanced features, like use of real time text, still images, and video. Due to state and municipal government budget constraints and other issues, the rollout of NG911 will take time, however. We anticipate that, before the sunset of the PSTN, it will be common for 911 Service Providers<sup>39</sup> to support both traditional E911 and NG911 services. For the Trial Wire Centers, however, no PSAPs have migrated off the legacy system and onto a NG911 system, and AT&T's Trial Proposal does not include any plans to migrate those PSAPs off of the legacy system *as part of the trial*. Consequently, for the foreseeable future, AT&T VoIP services will continue to provide routing for 9-1-1 calls to these legacy PSAPs in the manner described above and consistent with existing Commission rules.

For the Trial Wire Centers, AT&T acts as the 911 Service Provider for the area PSAPs. Because these PSAPs have not yet transitioned to NG911, AT&T does not foresee any reason that it would not be able to meet its obligations as a "Covered 911 Service Provider" under the Commission's recently released *911 Network Reliability R&O*.<sup>40</sup> Nonetheless, were these PSAPs to green light a plan to migrate to NG911 after the Commission approves AT&T's Trial Proposal, AT&T would be willing to provide the Commission with supplemental information that would reassure the Commission of AT&T's intention to abide by the requirements of the *911 Network Reliability R&O*, including bringing the Commission up to date on any "alternative measures" such a change might require.<sup>41</sup>

<sup>38</sup> See e.g., *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking*, WC Docket Nos. 04-36 and 05-196, 20 FCC Rcd 10245, n.80 (2005) (*VoIP 911 Order*) ("In general, providers of solely 'fixed' VoIP services (i.e., those that are not portable) face fewer technical obstacles to providing their customers with E911 service. [References omitted.] It appears that most fixed VoIP service providers already have deployed, or are in the process of deploying, E911 services very much like those provided to wireline telephone customers.").

<sup>39</sup> Also known as System Service Providers.

<sup>40</sup> See *Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-75, 11-60, Report and Order, FCC 13-158 (rel. Dec. 12, 2013) (*911 Network Reliability R&O*).

<sup>41</sup> See *Technology Transitions Trial Order*, ¶ 14.



b. Wireless Service

AT&T Mobility's *Wireless Home Phone* service is a Commercial Mobile Radio Service (CMRS). Wireless Home Phone uses a mobile base station device to facilitate the use of AT&T's CMRS voice service in the home by allowing a subscriber to connect traditional customer premises equipment (*i.e.*, touch-tone, corded or cordless home telephones) to the Wireless Home Phone base station and thereby allow connectivity to AT&T's licensed spectrum—just like any of AT&T's other CMRS voice network-compatible devices.<sup>42</sup>

Because it is a CMRS service, Wireless Home Phone is mobile and can be used at different locations and, like AT&T's other CMRS service offerings, presently complies with the Commission's existing CMRS 911 service regulations (47 C.F.R. Part 20). This means that, depending on the subscriber's location, Wireless Home Phone will provide access to Basic 911 Service (Basic), Phase I Enhanced 911 Service (Phase I), or Phase II Enhanced 911 Service (Phase II). As the Commission knows, Phase II service includes providing the PSAP both the telephone number of the originator of the 911 call and the caller's longitude and latitude in conformance with the Commission's Phase II accuracy requirements.<sup>43</sup>

Wireless Home Phone is a reliable CMRS product. It provides at least the same level of service and access to 911 as other CMRS services. Across the country, consumers have opted to replace wireline POTS service with interconnected VoIP (*e.g.*, AT&T's U-verse fixed voice offering or Vonage's nomadic VoIP service) or with wireless service (*e.g.*, by using a traditional handset or smartphone or by using a base-station device, like AT&T's Wireless Home Phone) regardless of the differences between the 911 access provided by POTS and these alternative services. For consumers opting to choose wireless service as an alternative to wireline POTS, Wireless Home Phone provides a convenient, economical, reliable, and practical choice. AT&T recognizes, however, that regulators and the public safety community have raised concerns regarding situations in which consumers are *required* to accept a different standard of 911 access. AT&T seeks to address these concerns ahead of proposing a wireless service as a substitute for wireline POTS.

AT&T is already working on upgrading the 911 capability of its Wireless Home Phone offering to address the concerns expressed by the public safety community, such as adding an ALI function to emulate the customer's experience with wireline TDM service.<sup>44</sup> Naturally, this effort to enhance the Wireless Home Phone offering is complicated by the *mobile* aspect of the service. To emulate the wireline 911 experience in a mobile offering, we are developing

<sup>42</sup> The Wireless Home Phone base station doesn't have a key pad and relies on the corded or cordless home telephone to dial telephone numbers. Wireless Home Phone includes caller-ID, call forwarding, and voicemail features.

<sup>43</sup> 47 C.F.R. § 20.18(h).

<sup>44</sup> Today, with wireline telephony, calls to 9-1-1 provide both the call back telephone number (ANI) and the Master Street Address Guide (MSAG) location—*i.e.*, the dialing party's actual street address.



enhancements that will allow AT&T to send MSAG information to the appropriate PSAP while the device is at a registered service address. Under any such solution, the service would have to allow subscribers to update their MSAG address easily and accurately when the base station device has been moved to a new location.<sup>45</sup> To the extent a customer uses the device while in motion (such as in a mobile home or other vehicle), the device would provide the same 911 functionality as any other CMRS device. AT&T will not seek to grandfather its TDM-based voice services until these enhancements are available.

#### *6.1.2. Safeguards to Ensure Public Safety Functionality in Adverse Conditions*

In any trial of IP-based services, the Commission wants providers to demonstrate that they “will be able to immediately restore [their] legacy service, fix [their] IP-based service, or provide a comparable service.”<sup>46</sup> This condition has already been addressed for AT&T’s proposed trial because (1) AT&T is planning on replacing legacy services with tested AT&T VoIP services, which are highly reliable; and (2) AT&T has long-standing and well-tested maintenance and repair operations and procedures to address the occasional service disruption. Likewise, AT&T has the personnel, equipment, experience, and training to address service disruptions caused by natural or manmade disasters (*e.g.*, hurricanes, tornados, or derechos).

The AT&T VoIP services that AT&T plans to use during the Wire Center Trial are already in place in those wire centers, as well as in hundreds of other wire centers across AT&T’s in-region footprint. They have been tested over time and under various conditions. AT&T intends to offer these services in place of legacy services—first on a voluntary basis and ultimately as a replacement for discontinued services. These services are generally available in the marketplace, and have been for years—they are not in any way new or experimental. Consequently we already have practices and procedures in place to maintain and test facilities and to address service disruptions. During the Wire Center Trials, AT&T will exercise the same standard of maintenance, repair, and replacement for its IP-based services that it applies when maintaining, repairing, and replacing legacy services.

In addition to everyday efforts to maintain and repair AT&T VoIP services, AT&T stands ready, today, to respond to man-made and natural disasters that are capable of inflicting significant damage to communities at large, resulting in commercial power outages and destruction of facilities. As explained in prior filings with the Commission, AT&T has the personnel, equipment, and know-how to respond to such events.<sup>47</sup>

<sup>45</sup> If the wireless device were not at the registered MSAG location, then the service could still provide the calling party’s ANI and ALI, *i.e.*, the latitude and longitude of the caller’s location, as appropriate for any other wireless device operating on AT&T’s licensed spectrum.

<sup>46</sup> *Technology Transition Trials Order*, Appendix B, ¶ 17.

<sup>47</sup> *See, e.g.*, Comments of AT&T, PS Dockets Nos. 11-60, 10-92, 06-119, pp. 3-12 (filed July 7, 2011) (*AT&T July 2011 Comments*).

The first line of defense is a hardened network. AT&T protects its facilities from physical damage by designing them to meet or exceed industry standards for continued operations during a wide range of natural and man-made disasters. This design focus includes reference to specific conditions inherent to the local environment (*e.g.*, frequency of earthquake activity, susceptibility to hurricanes, likelihood of wild fires, *etc.*). At a minimum, AT&T requires that critical equipment comply with Network Equipment-Building System (NEBS) guidelines developed originally by Bell Labs and then later maintained by Telcordia Technologies, Inc., now Ericsson. Moreover, AT&T is a leader in the measurement of network reliability by adapting the manufacturing model of defects per million (DPM) to the measurement of reliability in its own networks. Through the DPM measurement, AT&T is able to rapidly and accurately determine the root cause of a network outage and to hold the responsible party (*e.g.*, vendor, supplier, process, or business unit) to account with the aim of avoiding similar events in the future.

In addition to hardening the network, AT&T has invested in a Network Disaster Recovery (NDR) program whereby AT&T “strives to deliver the highest levels of service, quality, and reliability under all circumstances.”<sup>48</sup> Under the NDR program, AT&T stands ready to mobilize personnel and equipment by pre-staging and distributing mobile disaster response technologies across the country. For example, AT&T has specially-designed tractor-trailers, which act as virtual network offices and mobile command centers, called Emergency Communications Vehicles (ECVs), and self-contained mobile cell sites (*e.g.*, cells on wheels, COWs, and cells on light trucks, COLTs) and satellite COLTs, which employ a satellite link to provide voice and data service within 30 minutes of arriving on site.<sup>49</sup>

Additionally, AT&T maintains other emergency equipment and logistical support ready for quick deployment, such as portable generators, industrial chillers, dewatering pumps, diesel, gasoline, compressed natural gas fuel tanker capability, and mobile local fuel storage cells. AT&T maintains a robust, best-in-class disaster recovery program, prepared to set up a “M.A.S.H.”-style tent city, with thousands of military-grade Meals Ready to Eat (MRE) and complete life, health, and safety support for AT&T’s army of restoration personnel. When a telecommunications disaster strikes, it does not necessarily leave any supporting infrastructure, so AT&T is prepared to operate a self-sufficient restoration camp, whenever necessary.<sup>50</sup>

AT&T applies the same staff, equipment, and know-how to AT&T VoIP services. Therefore, the switch from reliance on TDM-based services to VoIP services will not diminish

<sup>48</sup> See *id.*, pp. 10-12. See also: <http://www.corp.att.com/ndr/>.

<sup>49</sup> An example of this can be seen in AT&T’s response to the EF-5 tornado that struck Moore, OK, on May 21, 2013. [http://www.corp.att.com/ndr/deployment\\_2013\\_moore\\_tornado.html](http://www.corp.att.com/ndr/deployment_2013_moore_tornado.html).

<sup>50</sup> AT&T was the first company in the country certified by Department of Homeland Security under the PS-Prep™ standards. See: <https://www.dhs.gov/news/2012/03/14/dhs-announces-att-ps-prep-certification> (“The Department of Homeland Security (DHS) announced today that AT&T Inc. has become the first private sector company to be certified to DHS-selected standards under the Voluntary Private Sector Preparedness Program. PS-Prep™”).



AT&T's investment in disaster recovery preparedness, lessen AT&T's commitment to respond quickly to disaster events, or otherwise undermine AT&T's abilities to address the unique challenges presented by such events. So, whether through everyday maintenance and repair operations or through disaster recovery plans, AT&T has contingencies in place to address the Commission's concerns about confronting events that might compromise public safety.

#### *6.1.3. Protect Essential Communications Services for Safety of Life and National Security.*

In the *Technology Trial Order*, the Commission emphasized that the proposed trials would not "be permitted to threaten our country's essential national security and public safety communications systems."<sup>51</sup> As noted, certain departments and agencies of the United States Government "maintain communications systems that today rely heavily on legacy TDM-based networks and services."<sup>52</sup> In the Order, the Commission mentioned two by name—i.e., Department of Defense (DOD) and the Federal Aviation Administration (FAA)—but other executive branch agencies may be in the same situation. Therefore, the Commission directed applicants that any proposed trials "must . . . allow for the continuation of TDM-based networks and services for critical Federal systems *until it is proven that IP-based solutions can meet system requirements for the performance of safety of life and national security missions.*"<sup>53</sup>

Our study indicates that there are no DOD facilities or facilities of any other Federal executive branch agency, including the FAA, served by any legacy TDM-based network facilities or services originating from the Trial Wire Centers. Nevertheless, to the extent such facilities exist, AT&T is committed to maintaining them until it is proven that AT&T IP-based solutions can meet system requirements for the performance of safety of life and national security missions.

#### *6.1.4. Ensure Network Security*

The Commission has requested detailed descriptions, including supporting data, regarding the security practices that applicants have undertaken to secure IP-based infrastructure and descriptions of the Supply Chain Risk Management (SCRM) practices applicants will follow in the course of conducting their experiments. Network and information security are a cornerstone of AT&T's operations worldwide. AT&T has in place today a comprehensive risk management program to ensure the security and integrity of its network and services, including our IP-based infrastructure. In this section, AT&T provides an overview of that program, which will apply to the wireless and wireline IP-based services AT&T will offer in place of TDM both during and after the trials proposed here. Given the sensitivity of providing more detailed

<sup>51</sup> *Technology Transition Trials Order*, ¶ 42.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*, Appendix B, ¶ 18.



information on AT&T's security practices, additional information may be provided upon request in direct consultation with the Commission.

AT&T has a long history of collaborating with the Commission on emerging issues and security standards development through the Communications Security Reliability and Interoperability Council (CSRIC). We also participate in the communications sector coordination process for critical infrastructure, which is led by the Department of Homeland Security (DHS). AT&T also notes that on February 12, 2014, the National Institute of Standards and Technology (NIST) published its initial baseline Cybersecurity Framework to fulfill President Obama's Executive Order on cybersecurity, which proposes a set of baseline requirements for critical infrastructure.<sup>54</sup> NIST designed that framework based on industry standards and best practices, with input from the communications sector and other stakeholders. The implementation and continued evolution of the NIST framework should be a cooperative effort that includes industry and government agencies. In addition, any standards that the Commission develops in this area should broadly apply to all IP service providers, including providers of VoIP services.

a. AT&T's Security Practices

AT&T's corporate policy and practice is to protect its information resources from unauthorized or improper use, theft, accidental or unauthorized modification, disclosure, transfer, or destruction, and to implement protective measures commensurate with their sensitivity, value, and criticality. AT&T's information resources include any owned or managed systems, applications, and network elements, and the information stored, transmitted, or processed with these resources. AT&T develops and issues specific internal standards and other reference materials in support of this policy, collectively referred to as the "AT&T Security Policy and Requirements" (ASPR). ASPR includes policies addressing AT&T's workforce; its technology, vendor, contractor, and supplier contracts; and overall compliance, as well as related risk-assessment practices. Given the dynamic environment that AT&T supports, ASPR is continually re-evaluated and modified as industry standards evolve and as circumstances require.

AT&T's program is built upon industry standards such as ISO/IEC 27001:2005. AT&T has undertaken an audit of its enterprise security policies, program and practices, resulting in formal certification to the ISO27001:2005 Information Security Management Standard, including the latest certification, which covers hosting and cloud services. Consistent with such certification, AT&T: (1) systematically examines the organization's information security risks, taking account of the threats, vulnerabilities, and impacts; (2) designs and implements a coherent and comprehensive suite of information security controls and/or other forms of risk treatment (such as risk avoidance or risk transfer) to address those risks that are deemed unacceptable; and

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<sup>54</sup> *Framework for Improving Critical Infrastructure Cybersecurity*, Version 1.0, National Institute of Standards and Technology, Feb. 12, 2014. Available at <http://www.nist.gov/cyberframework/>.

(3) has adopted an overarching management process to maintain information security controls that continue to meet the organization's information security needs on an ongoing basis. AT&T follows standards and certifications required for specific lines of business, including SSAE 16/ISAE 3402/SOC1 (formerly SAS 70), SOC 3 (formerly SysTrust), Payment Card Industry (PCI) Data Security Standard (DSS), HITRUST, or similar certifications or audits.

Further, AT&T actively participates in a wide range of standards bodies that include initiatives related to information security including the Internet Engineering Task Force (IETF), Alliance for Telecommunications Industry Solutions (ATIS), 3rd Generation Partnership Project (3GPP), GSMA, and the National Institute of Standards and Technology (NIST).

AT&T regularly conducts internal reviews of operations and applications functions to ensure adherence to established security procedures. AT&T reports the results of these reviews to its regional security managers and executive management. AT&T's internal review of business unit and operational compliance with security requirements consists of a comprehensive review of an organization's adherence to regulatory guidelines and internal policies, controls, and procedures, as applicable. AT&T security auditors and assessors evaluate the strength and thoroughness of compliance. Assessors review security policies, user access controls, and risk management procedures over the course of a compliance engagement and report the findings to all key stakeholders.

More specific to cybersecurity, AT&T maintains an extensive security program for the detection and mitigation of cyber threats. There are multiple components to the program including physical and logical access controls; network perimeter protection; intrusion detection; workstation security management; security status checking and vulnerability testing; risk management; security advisory program; security incident reporting; management and response; security compliance reviews; internal and external reviews and audits; real time traffic monitoring; change management; business continuity and disaster recovery; AT&T corporate management engagement; strategy for continuous improvement; personnel security; security awareness and education; and security training and certifications.

AT&T also has in place control frameworks that span various network assets including applications, databases, servers, end-user devices (*e.g.*, personal computers), modems, routers and switches, and firewalls. These control areas can include, but are not limited to, as appropriate, authentication, authorization, user and session management, data protection, data validation, error and exception handling, auditing and login, configuration management, account control, identification, system protection and integrity, patch management, anti-virus, disk encryption, host intrusion, and a variety of other security controls. With respect to company security practices that may be broadly applicable across sectors and throughout industry, AT&T employs processes and procedures in each of the following functional categories: separation of business from operational systems; separation of duties for administrators and users; use of encryption and key management; identification and authorization of users accessing systems;



asset identification and management; monitoring and incident detection tools and capabilities; incident handling policies and procedures; mission/system resiliency practices; and security engineering practices.

AT&T also maintains the security of its mobile network. AT&T's Radio Access Network (RAN) complies with 3GPP airlink security standards, as well as AT&T Security policies, which are in turn certified to the ISO/IEC 27001:2005 Information Security Management Standard. The RAN uses secure protocols in order to maintain and manage communication with the mobile station, as well as specific procedures that include power control and handover management. An important security mechanism that protects the radio link against eavesdropping is encryption, which protects both user data and network control information.

AT&T and its employees also interact with and participate in several U.S. and international security organizations, including, but not limited to the following:

- Communications Sector Coordinating Council (CSCC);
- National Security Telecommunications Advisory Council (NSTAC);
- Computer Emergency Response Team/Coordination Center (CERT/CC);
- Forum of International Response and Security Teams (FIRST) Team;
- U.S. Department of Homeland Security's National Security Telecommunications Advisory Committee (NSTAC) and its National Coordinating Center (NCC) for Telecommunication;
- U.K. Centre for the Protection of National Infrastructure (CPNI);
- National Security Information Exchange (NSIE);
- Various Information Sharing and Analysis Centers (ISACs), including Information Technology-ISAC and communications-ISAC;
- US InfraGard;
- Security activities within the Internet Engineering Task Force (IETF).

AT&T also participates in the following government cybersecurity initiatives:

- National Infrastructure Protection Center (NIPC);
- National Telecommunications and Information Administration (NTIA);
- Network Reliability Steering Committee (NRSC).



b. Supply Chain Security Requirements

AT&T deals with a carefully selected and limited number of well-established core network router and switch vendors, and has trusted relationships with these manufacturers and vendors that have developed over time. When conducting due diligence in the selection of network equipment, AT&T may, among other things, evaluate hardware and software to ensure it meets AT&T's security standards; test equipment to ensure data transfers cannot be intercepted or redirected; test software to ensure data transmission security; examine manufacturer's provenance and business history; and consult with the NIST or the Department of Commerce.

AT&T generally requires its vendors to comply with the specifications applicable to the network equipment, software, and devices that it procures. Compliance with these specifications is an important factor in the vendor selection process. In addition, vendors generally are required to comply with AT&T's Supplier Information Security Requirements (SISR), a detailed set of information and data security requirements incorporated into contracts. SISR, among other things, requires a vendor to document its security controls and procedures and requires that they be made available to AT&T for audit. These SISR requirements are an integral part of ASPR. All suppliers and contractors and agents of the AT&T companies are responsible for protecting AT&T information resources to preserve the confidentiality, integrity, and availability of computing, networking, and information assets. Suppliers and contractors are trained before being admitted into an AT&T workspace.

c. IP Telephony

The security challenges associated with IP services include the risk of toll fraud, concerns over data transmission and eavesdropping, voice phishing, denial of service attacks and spam.<sup>55</sup> Most, if not all, of these threats are not new; they existed on traditional TDM networks too. With proper precautions in place, security threats can be managed and minimized. Recently, a range of standards and best practices to address these concerns have emerged.

AT&T follows standard security practices for IP-based services as part of its security risk management program. During the trial, and throughout the transition, AT&T will continue its review of emerging cybersecurity threats and security standards to determine which are appropriate to protect its IP-based infrastructure. In 2010, the Commission, through CSRIC (working group #2A, which was co-chaired by AT&T), refreshed its cybersecurity best practices from its predecessor the Network Reliability and Interoperability Council (NRIC) and added several practices related to VoIP. These include the suggestions that: service providers and network operators should use dedicated VoIP servers; service providers and network operators should block protocols meant for internal VoIP call control use at the VoIP perimeter; service

<sup>55</sup> <http://eandt.theiet.org/magazine/2011/07/voicing-security-concerns.cfm>.

providers should proxy remote HTTP access to VoIP perimeter firewalls; network operators should ensure that network services are hardened and have authentication, integrity and authorization controls in place to avoid inappropriate use of services; and equipment suppliers should harden their equipment.

These recommended practices are based upon standards developed by the Defense Information Systems Agency (DISA), the National Security Agency's (NSA) Security Guidance for Deploying IP Telephony Systems and the PacketCable Security Specifications. In addition, the industry has developed a range of common practices for the protection of IP-based telephony services, including NIST 800-58 Security Considerations for Voice Over IP Systems. Most of these documents apply existing cybersecurity practices—such as hardening, encryption, access controls etc.—in a VoIP configuration.

#### 6.1.5. *Ensure Adequate Backup Power*

In its *Technology Trials Order*, the Commission asks applicants to supply sufficient information to help the Commission “evaluate the measures that will be taken to maintain communications services in the event of a power outage.”<sup>56</sup> In particular, the Commission is focused on compliance with the Commission’s rules recently adopted in the *911 Network Reliability R&O*.

As to the *911 Network Reliability R&O*, the Commission has directed *Covered 911 Service Providers* to submit an annual reliability certification, which includes certifications with respect to backup power.<sup>57</sup> The rule adopted in 2013, and which is still subject to Office of Management and Budget approval under the Paperwork Reduction Act, requires certification with respect to the manner of backup power (fixed or portable generators, batteries, fuel cells, or combination), the duration of backup power (24 hours for Central Offices that directly serve a PSAP; 72 hours for such Central Offices if they also host a selective router), testing and maintenance of backup power equipment, and design of backup power equipment (e.g., fully automatic operation, stand-alone functioning).<sup>58</sup> If the Covered 911 Service Provider cannot certify to all these elements, the rule also allows it to certify to *alternative measures* employed by the provider to mitigate loss of service.

<sup>56</sup> *Technology Transition Trials Order*, ¶ 44.

<sup>57</sup> A “Covered 911 Service Provider” is defined as: “Any entity that: (A) Provides 911, E911, or NG911 capabilities such as call routing, automatic location information (ALI), automatic number identification (ANI), or the functional equivalent of those capabilities, directly to a public safety answering point (PSAP), statewide default answering point, or appropriate local emergency authority as defined in sections 64.3000(b) and 20.3; and/or (B) Operates one or more central offices that directly serve a PSAP. For purposes of this section, a central office directly serves a PSAP if it hosts a selective router or ALI/ANI database, provides equivalent NG911 capabilities, or is the last service-provider facility through which a 911 trunk or administrative line passes before connecting to a PSAP.” *911 Network Reliability R&O*, Appendix B, Rule 12.4(a)(4).

<sup>58</sup> *911 Network Reliability R&O*, Appendix B, Rule 12.4(c)(2).



With respect to the Trial Wire Centers, AT&T is a Covered 911 Service Provider and, as such, it fully intends to comply with all applicable Commission rules regarding 911 network reliability and backup power. Today, on the network side, AT&T's IP networks rely on commercial power with a combination of fixed and portable generators and batteries to supply backup power in case of loss of commercial power.

The Test Wire Centers have fixed diesel-fueled, backup engines. As a general practice, AT&T strives to maintain a minimum of 72 hours' worth of fuel in the engine tanks at all times. For its disaster recovery efforts, AT&T has an emergency fueling plan, which is managed by its Emergency Response Center and Fleet. And AT&T has a strategic partnership with a national fueling vendor that is capable of drawing upon resources from around the country in support of emergency refueling efforts.

In addition to the backup engines, each Test Wire Center has backup battery arrays. The Carbon Hill Wire Center has a 7.7 Battery Hour Reserve (BHR) and Kings Point has a 3.6 BHR. The BHR is the estimated battery life in terms of hours. Besides these backup power battery arrays, AT&T has portable generators available to support the fixed engines in the event of a failure for any reason. Portable generators are not typically staged at the wire center, but they are close enough for AT&T to deploy them before exhaustion of the battery reserve life of the direct-current plant (*i.e.*, backup battery array) for each office. With the portable generators, run times vary by the size of tank and the engine and current office load.

A significant difference between the network architecture of the TDM network and the IP network is that the IP network is more distributed, meaning that not all of the critical network elements are found within the confines of a wire center. These distributed elements are also powered by commercial power with battery backup power. Typically, depending on the facility in question, the backup power for distributed network elements runs from approximately four to eight hours. Power to these distributed facilities, like a DLC remote terminal, is also backed up by portable generators that are designed to be easily and quickly deployed and operationalized. The only distributed network facility that relies solely on batteries for backup power is the fiber-to-the-premises optical network terminal (ONT), which normally operates on commercial power drawn from the subscriber's home or place of business. Depending on circumstances, the ONT backup power lasts approximately eight hours.

AT&T provides customers information regarding the battery backup for the terminal equipment used with AT&T's VoIP services online at its U-verse Voice Support web page.<sup>59</sup> There, and in other customer-facing documents, AT&T alerts subscribers to the differences between traditional telephone service and AT&T VoIP service, the different devices used to provide the service (*e.g.*, residential gateway and ONT), how such equipment is powered, their respective backup power options, and instructions on what to do in preparation for and during

<sup>59</sup> See: <http://www.att.com/esupport/article.jsp?sid=KB409162#fbid=Yn0OinKDISU>.



commercial power outages with the aim of improving the subscriber's backup power battery life. During the trial, the same information will be readily available to customers of the Trial Wire Centers.

On the customer side of the demarcation point, AT&T U-verse VoIP, HSIA and IPTV service rely on a residential gateway (RG) for customer access. Customers simply plug in traditional corded or cordless home telephones to access the VoIP service.<sup>60</sup> The RG runs on commercial power but has a self-contained, rechargeable backup battery device that attaches to the power wall socket on one side and the RG on the other.<sup>61</sup> Should a subscriber lose commercial power, the battery device automatically provides backup power for approximately four hours.

Likewise, for Wireless Home Phone, the base-station device has a manufacturer-provided rechargeable battery pack that has an approximate 36 stand-by hours and three and a half (3.5) talk-time hours.<sup>62</sup>

#### 6.1.6. *Report Network Outages*

In the *Technology Trial Order*, the Commission stated that, during any "experiments," the trial applicants should "commit[] to filing outage reports and PSAP notifications consistent with the Part 4 rules."<sup>63</sup> The VoIP services that AT&T will use in the Trial Wire Centers to replace existing TDM-based services are not experiments but rather tested services (see discussion above). As such, with respect to these services today, AT&T is presently reporting outages as set forth in the Part 4 rules and is committed to continue doing so during the Trial and going forward.<sup>64</sup>

Similarly, Wireless Home Phone is a tested CMRS product and CMRS outages affecting Wireless Home Phone customers are presently reported in conformance with 47 C.F.R. § 4.9(e). AT&T fully expects any enhanced, successor product to be handled in a similar fashion.

#### 6.1.7. *Continued Compliance with CALEA*

The Commission seeks acknowledgement from applicants that services used by customers during any approved trial "will satisfy the Communications Assistance for Law Enforcement Act (CALEA), their obligations under Titles 18 and 50, and similar State

<sup>60</sup> While traditional corded phones do not rely on commercial power, cordless phones do. The backup power options for a subscriber's cordless phone would depend entirely on the make and model.

<sup>61</sup> With future models of the RG, the backup power will be contained within the RG unit itself.

<sup>62</sup> The rechargeable battery can be recharged by commercial power and by tapping into a motor vehicle electrical system using an inverter or the vehicle's power port or cigarette lighter.

<sup>63</sup> *Technology Transition Trials Order*, ¶ 45.

<sup>64</sup> 47 C.F.R. §§ 4.1 *et seq.*

requirements.”<sup>65</sup> With respect to AT&T VoIP services, AT&T presently complies with its CALEA and other law enforcement obligations. With respect to CALEA in particular, AT&T VoIP services are compliant with the ATIS-1000678.v2.2006 (also known as T1.678) standard.

Likewise, AT&T’s wireless services are CALEA compliant. Our Wireless Home Phone product today complies with the J-STD-025 for TDM-based wireless service. Moreover, with the rollout of AT&T’s Voice over LTE (VoLTE) service, Wireless Home Phone will comply with the appropriate IP-based standard (ATIS 0700005). Again, AT&T fully expects any enhanced, successor product to be handled in a similar fashion.

#### *6.1.8. Maintain Network Reliability*

As previously noted, the Commission is expecting trial applicants to show that they will maintain the “current levels of reliability, including the ability to function during commercial power failures and security from external attack, should be maintained in an experiment.”<sup>66</sup> To this end, the Commission is interested in considering “the extent to which applicants will follow the CSRIC best practices in the course of conducting their experiments,” both with regard to their new networks and their transitioned networks.<sup>67</sup>

In its efforts to build and maintain a reliable and resilient network, AT&T strives to apply best practices wherever and whenever such practices are appropriate to the situation at hand. AT&T is an active participant in CSRIC, and has willingly adopted CSRIC best practices as appropriate to the field conditions and the nature of the service offering. During the trial, AT&T will continue to follow the CSRIC best practices, as applicable, with respect to its legacy network and in the provision of VoIP and Wireless Home Phone services.

Both AT&T VoIP services and AT&T’s wireless services are highly reliable. With respect to AT&T VoIP services, these services are at least as reliable as competitive fixed VoIP services offered in AT&T’s in-region territories.<sup>68</sup> Apart from the inherent reliability of the AT&T VoIP services, AT&T has committed to a program to address the occasional, temporary loss of commercial power (see discussion above on Backup Power), as well as the more serious challenges posed during and after man-made and nature disasters (see Safeguards to Ensure Public Safety above).

#### *6.1.9. Provision of Public Alerts*

The Commission correctly presumes that “applicants who support provision of Wireless Emergency Alerts (WEA) over some or all of their service areas’ legacy infrastructure will

<sup>65</sup> *Technology Transition Trials Order*, ¶ 46.

<sup>66</sup> *Id.*, Appendix B, ¶ 24.

<sup>67</sup> *Id.*

<sup>68</sup> Both Comcast in Kings Point and Charter Communications, Inc., in Carbon Hill offer competing VoIP services.



continue to provide WEA or provide equivalent alerting capability in such areas.”<sup>69</sup> With regard to AT&T, that presumption is correct. This trial will in no way alter or diminish AT&T’s provision of WEA.

Emergency Alert Systems (EAS) will not be affected by AT&T’s Transition Trial because EAS are not dependent on legacy TDM facilities. As for AT&T’s U-verse television service, in particular, we monitor, receive, and retransmit emergency alerts independently of TDM services.

Accordingly, during AT&T’s Transition Trial, there should be no issue with sustaining and providing current levels of public alerts.

#### *6.1.10. Public Safety Priority Services*

The Commission also presumes that during any trial, applicants “will accommodate priority access, routing, provisioning, and restoration for essential national security and emergency preparedness communications.”<sup>70</sup> In particular, the Commission highlighted the importance of Wireless Priority Service (WPS), Government Emergency Telecommunications Service (GETS), and Telecommunications Service Priority (TSP) as being “at the core of community planning” and “vital for tactical, emergency response.”<sup>71</sup> None of these services will be adversely affected by the proposed trial.

GETS traffic prioritization has been engineered into AT&T’s business VoIP offering allowing call prioritization across the IP and TDM networks. GETS prioritization has not yet been engineered into the AT&T’s consumer VoIP offering (e.g., U-verse). GETS calls will still complete across the CVoIP platform, but call prioritization would only occur on a portion of the call that was engineered for NS/EP priority, (e.g., a TDM or BVoIP portion). WPS will not be adversely impacted by the Wire Center Trial. WPS access is currently available through AT&T’s Wireless Home Phone service.<sup>72</sup>

During the Trial, AT&T will support and comply with all TSP rules and policies for applicable services—*i.e.*, those services that have a Layer 1 component to the circuit. Specifically, in the Trial Wire Centers, AT&T will be able to tag AT&T VoIP service circuits to provide priority service for our TSP subscribers.<sup>73</sup> As for any future enhanced version

<sup>69</sup> *Technology Transition Trials Order*, Appendix B, ¶ 25.

<sup>70</sup> *Id.*, Appendix B, ¶ 27.

<sup>71</sup> *Id.*

<sup>72</sup> AT&T Mobility subscribers seeking to use the Wireless Home Phone service for WPS access will need a SIM card provisioned for such access and will need to pay a subscription for the service. Access to GETS does not require a paid subscription, but subscribers are charged when GETS is accessed.

<sup>73</sup> While not anticipating any issues, AT&T is willing to take any unforeseen matters to the Commission’s TSP Oversight Committee.



of Wireless Home Phone, there would be no individualized Layer 1 element to prioritize.<sup>74</sup> Restoration of wireless network service is appropriately prioritized to address the needs of Wireless Home Phone subscribers.

## 6.2. UNIVERSAL ACCESS

### 6.2.1. *Access for Persons with Disabilities and Populations with Unique Needs.*

During the trial (and, indeed, the broader IP transition), AT&T will continue to meet its historic commitment to satisfying the communications needs of persons with disabilities and populations with unique needs (including seniors, persons with limited English proficiency, low-income populations, and residents of Tribal lands).<sup>75</sup> That commitment dates to AT&T's founding, and is unparalleled in the communications industry and a model for service providers in other industries.<sup>76</sup> That will not change during the trials. To meet that commitment, AT&T has developed an outreach plan for persons with disabilities and other populations with unique needs as an integral component of the trials. That plan has five elements: identifying customers with disabilities in the trial wire centers; customer outreach and education; customer care and support; identifying accessible technology solutions; and transitioning persons with disabilities from one service to another.

#### a. Customer Identification

An essential component of AT&T's outreach plan for persons with disabilities and other populations with unique needs is to identify these customers so that we can provide notice of the trials, accommodate their needs, and provide them a means to communicate with AT&T with any concerns or issues they may have. However, AT&T does not generally request customers to self-identify any disability or keep any records identifying customers with disabilities or who use assistive technology. As a consequence, AT&T is seeking the cooperation and assistance of national, state and local disability organizations with expertise regarding a range of disabilities to help AT&T identify customers with disabilities while simultaneously maintaining those customers' reasonable expectations of privacy. Already, AT&T has met with disability advocates and experts representing a dozen national organizations to share its plans for the trial

<sup>74</sup> The Wireless Home Phone base station device is like any hand-held wireless device; that is, it is owned by the subscriber. AT&T does not dispatch repair services for CPE.

<sup>75</sup> As discussed in section 6.2.2., one of the IP-based replacement services AT&T will offer in the trial wire centers is its Wireless Home Phone service. The price of Wireless Home Phone is lower than a typical customer pays today for traditional POTS service, providing low income consumers (including elderly customers on a fixed income) a low-cost option that meets their budgetary needs.

<sup>76</sup> Indeed, Alexander Graham Bell, the founder of AT&T, was a teacher of deaf people, and his invention of the telephone in 1876 was an outgrowth of his efforts to develop the first hearing aid. Global Initiative for Inclusive Information and Communication Technologies (G3ict), White Paper, *Accessibility, Innovation, and Sustainability at AT&T: How a culture of inclusion and the adoption of Universal Design at AT&T drive business processes to serve persons with disabilities*, at 13 (2013) (listing early accessibility milestones at AT&T) (available at: [http://www.att.com/Common/merger/files/pdf/G3ict\\_White\\_Paper.pdf](http://www.att.com/Common/merger/files/pdf/G3ict_White_Paper.pdf)), attached hereto as Exhibit G. G3ict is an Advocacy Initiative of the United Nations Global Alliance for ICT and Development, which seeks to facilitate and support implementation of the Convention on the Rights of Persons with Disabilities.

and to discuss the limitations we face in identifying customers with disabilities. AT&T will work with these organizations to develop a plan for providing persons with disabilities detailed information regarding the trials, and the steps AT&T will make to ensure they continue to have access to accessible communications technologies and services. That plan will rely on those organizations to contact their constituents directly to provide them such information using communications media appropriate for individuals with different disabilities. AT&T is soliciting proposals from these disability groups regarding how they will identify and communicate with their constituents.

b. Outreach/Communications

As discussed in Section 5, AT&T has developed a detailed and extensive customer outreach and communications plan to ensure that all of our customers receive appropriate notice and information about the trials, and their potential impact on customers. AT&T will include in this initiative messages and communications media specifically tailored to meet the needs of persons with various disabilities, and populations with unique needs. In particular, AT&T will:

- Work with national disability organizations to identify and begin outreach to local disability organizations in the trial areas and brief those local organizations on the IP trials;
- Include in customer notices regarding the trial a telephone number that customers can call to speak with representatives at AT&T's Disability and Aging Center, who are specially trained to assist seniors and customers with disabilities and will be able to communicate using TTY;
- Launch an accessible website with information about the IP transition for customers with and without disabilities;
- Ensure that information it posts to the web about the trials will be accessible to customers who are blind, with low vision, or other disabilities;
- Provide customer service agents and retail employees with training materials about the impact of the IP Transition on customers with disabilities;
- Hold training sessions for local disability organizations, and for seniors;
- Provide informational materials to local disability organizations and seniors groups, and support their efforts to educate their constituents about the trials, how AT&T plans to address the needs of persons with disabilities and seniors, and how to provide feedback about their experiences to AT&T;
- Collaborate with other organizations in the development of outreach material; and
- Engage with local disability organizations and groups for seniors upon request , and participate with them in trial-related events.



c. Customer Care Process

AT&T's customer care and support plans also have been designed to accommodate persons with disabilities and populations with unique needs. Among other things, AT&T has designed its customer care webpages and online tools to be accessible by persons with disabilities and populations with unique needs (for example, the customer care webpages are available in English and Spanish). We also have provided customer care agents at AT&T's Disability and Aging Center training and other materials regarding the trials, and how the transition could impact assistive technology to ensure they provide appropriate care and support to persons with disabilities and seniors.

d. Technology

In section 4 and the detailed product sheets attached as Exhibit E, we have provided detailed information regarding the transition, including information about the TDM-based products and services offered in the trial wire centers, their IP-based wireline and wireless replacements, and any differences in features, functions and capabilities between them. As discussed above, AT&T still is developing some of these replacement services, and is in the process of upgrading others to meet its customers' needs and the fundamental network values discussed above. For example, AT&T is upgrading its Wireless Home Phone service to provide enhanced location accuracy, and to ensure that health monitoring and other devices will function properly.

In developing and upgrading its IP-based wireline and wireless services, AT&T has sought to ensure that they will meet the needs of persons with disabilities, seniors and other populations with unique needs. We recognize the concerns such persons may have regarding the impact of the TDM to IP transition, and plan to address accessibility issues head-on during the trial so that we can work cooperatively with disability organizations, seniors and others to develop appropriate technical solutions, consistent with our product/service design and development process outlined above.

e. Specific Customer Transitions

In the foregoing subsections, we have described AT&T's general plans for addressing the unique needs of persons with disabilities, seniors and other populations so they have access to IP-based communications products and services that meet their needs, and are providing them information needed to make the transition from TDM to IP during the trial. But we recognize that each of our customers is a unique individual, and may have needs or concerns that we may not have anticipated. As a consequence, we have implemented two precautions to ensure that all of our customers with disabilities continue to have access to accessible communications services. First, if a customer with a disability relies on assistive technology that does not function effectively over AT&T's IP-based alternative service and an IP-compatible device with comparable functionality is not available, AT&T will not seek to transition that customer to an IP alternative. Second, if customers with disabilities transition from TDM to IP and later find their assistive technology does not work, AT&T promptly will switch them back to their prior TDM service while we identify an appropriate solution.



### 6.2.2. *Maintaining Universal Service Status Quo.*

Consistent with the Commission's presumption in the *Technology Transitions Order*, AT&T will maintain its existing eligible telecommunications carrier (ETC) status and comply with all obligations arising from that status, at the outset of the trials — that is, during the period AT&T offers IP-based services only on a voluntary basis in the wire centers.<sup>77</sup> But, at an appropriate time before AT&T seeks to grandfather existing customers of TDM-based services, AT&T plans to file a request for relief from the ETC obligations in the trial wire centers effective on the first day of Stage 1 of the trials.<sup>78</sup> In that request, AT&T will demonstrate how it will satisfy the universal access statutory objective in other ways, and elaborate on why such relief is appropriate. In this section, we provide a brief overview of the issue to preview why it will be unnecessary to require AT&T and AT&T to maintain their ETC status in the two trial wire centers, and how doing so would hinder these experiments.

Congress created the ETC designation in the Telecommunications Act of 1996 (1996 Act) and determined that only ETCs shall be eligible to receive specific universal service support,<sup>79</sup> except for Lifeline support, which Congress exempted from that requirement.<sup>80</sup> Notwithstanding this congressional exemption, the Commission has linked participation in its Lifeline program to the ETC designation through its rules so that, currently, every ETC must participate in the Commission's Lifeline program.<sup>81</sup> Additionally, the Commission has permitted providers to participate only in the Commission's Lifeline program but it has required those providers to become Lifeline-only "ETCs," which, is unnecessary pursuant to section 254(j) of the statute.

By statute, ETCs are common carriers that must "offer the services that are supported by Federal universal service support mechanisms" throughout their designated ETC service areas.<sup>82</sup> Currently, "voice telephony service" is the sole supported service.<sup>83</sup> As a condition of receiving high-cost support in a state, the Commission requires an ETC to offer voice telephony service on a standalone basis throughout its designated service area in that state.<sup>84</sup> AT&T does not offer its

<sup>77</sup> *Technology Transition Trials Order*, App. B at ¶ 32.

<sup>78</sup> Of course, if the Commission modifies its ETC requirements before the first day of Stage 1 of the trials, which it should, there may be no need for AT&T to request such relief.

<sup>79</sup> See 47 U.S.C. §§ 214(e), 254(e).

<sup>80</sup> 47 U.S.C. § 254(j) ("Nothing in this section shall affect the collection, distribution, or administration of the Lifeline Assistance Program . . .").

<sup>81</sup> See 47 C.F.R. § 54.405(a).

<sup>82</sup> See 47 U.S.C. § 214(e)(1).

<sup>83</sup> 47 C.F.R. § 54.101(a).

<sup>84</sup> See *Connect America Fund, et al.*, WC Docket No. 10-90 et al., 26 FCC Rcd 17663, ¶ 80 (2011) (*USF/ICC Transformation Order*).

VoIP services on a common carrier basis, nor does it offer its VoIP services on a standalone basis. Additionally, as noted above, ETCs must offer Lifeline-discounted service to eligible low-income customers and comply with the Commission's Lifeline program obligations.

ETCs also must comply with various reporting requirements and, potentially, state-imposed ETC obligations. State commissions are required to permit an ETC to relinquish its designation in any area served by another ETC.<sup>85</sup> But, there is no clear path for ETCs to relinquish their designations in those geographic areas where there is no other ETC even if there are numerous other providers offering voice telephony service in such areas.

Despite the Commission's directive in 1997 that states should not designate large carriers as ETCs throughout their entire study areas,<sup>86</sup> all of the state commissions where AT&T provides service as an incumbent local exchange carrier (ILEC) did just that. The ETC service areas of AT&T's ILECs mirror these carriers' study areas. Consequently, in those states where AT&T's ILECs receive some amount of high-cost support, however small or targeted to discrete geographic areas, these carriers are required to offer voice telephony service on a standalone basis throughout their vast study areas. AT&T receives so-called frozen high-cost support in Alabama and Florida. Although it is not required to spend any of that high-cost support in the trial wire centers under the Commission's current requirements, AT&T must offer a standalone voice service in these wire centers.

Later this year, the Commission will offer price cap carriers, such as AT&T, Connect America Fund (CAF) Phase II support.<sup>87</sup> This support will be targeted to Commission-identified high-cost areas. All other areas within a price cap carrier's study area will be ineligible for CAF Phase II support. If a price cap carrier declines the Commission's offer of model-calculated support (referred to as the state-level commitment), the Commission will commence a competitive process to award support to providers that will deploy broadband in these Commission-identified areas.<sup>88</sup> Unless the Commission modifies the ETC requirements applicable to price cap carriers, which it should, any AT&T ILEC that remains a legacy ETC will be saddled with service obligations (to provide Lifeline, to the extent it continues to receive frozen high cost support and stand-alone voice throughout its entire study area) that would not apply to their competitors receiving the same support. Those competitors likely will seek and obtain ETC designations covering only those areas where they actually receive CAF Phase II support. Even if AT&T's ILECs do not accept any CAF Phase II support, they will be subject to service obligations (to offer voice telephony service and Lifeline supported services throughout the area for which they have been designated as an ETC) that will not apply to such competitors.

<sup>85</sup> 47 U.S.C. § 214(e)(4).

<sup>86</sup> *First Universal Service Order* at ¶¶ 184, 185.

<sup>87</sup> *Technology Transitions Trial Order* at ¶ 98 ("We expect to implement the offer of model-based support to price cap carriers before the end of 2014.").

<sup>88</sup> *See, id.* at ¶ 100.



Moreover, insofar as large swaths of AT&T ILECs' service territories will be ineligible for CAF Phase II support, their obligation to provide voice and Lifeline service in much, if not most, of their territories will be unfunded.

Under the latest version of the Commission's Connect America Model (CAM), almost all of the Kings Point wire center is ineligible for CAF Phase II support, and many areas within the Carbon Hill wire center are similarly ineligible.<sup>89</sup> Unless the Wireline Competition Bureau drastically changes the CAM before the date it is scheduled to offer price cap carriers Phase II support later this year, the Commission soon will conclude (based on its own measure — the CAM) that the trial wire centers require little or no universal service support to preserve and advance universal access,<sup>90</sup> and neither AT&T nor any other provider will be eligible to receive support there. If the Commission determines that support is unnecessary to maintain universal access in these areas, it also should find that requiring a carrier to maintain its ETC status is unnecessary to protect the public interest. For those pockets of the two trial wire centers that are CAF Phase II eligible, if the Commission offers a sufficient amount of support, some provider — which may be AT&T or some unaffiliated provider — may accept the service obligations in exchange for the funding. And, that provider will be an ETC, in accordance with the Commission's requirements.

Requiring AT&T to provide voice on a standalone basis in areas where it does not receive — and, under CAF Phase II, where it cannot receive — high-cost support, would distort the market. In particular, such a requirement would preclude AT&T, but not its competitors, from offering voice only as part of a bundle with broadband Internet access and/or video services, or as an application provided over a broadband Internet access service.<sup>91</sup> Particularly given the robust competition AT&T faces from wireless, cable MSOs and other wireline providers of broadband, there is no basis for limiting the way in which AT&T and other ETCs may structure their services if those limits do not apply to competitors as well — particularly in areas where the Commission has concluded that funding is unnecessary to support universal service. Any such requirement is wholly unnecessary because customers in the trial wire centers have a multitude

<sup>89</sup> See *Wireline Competition Bureau Releases Maps of Illustrative Results for Connect America Cost Model Version 4.0*, WC Docket No. 10-90, Public Notice, DA 14-153 (rel. Feb. 6, 2014). According to CAM v4.0, the amount of CAF Phase II support that would be available to serve the eligible areas in the Kings Point wire center is less than \$8,900/year and \$160,000/year in the Carbon Hill wire center.

<sup>90</sup> See 47 U.S.C. § 254(b)(5) (The Commission should establish “specific, predictable, and sufficient . . . mechanisms to preserve and advance universal service.”).

<sup>91</sup> Given the very high capital costs necessary to expand broadband deployment, service providers must be able to recover their costs from subscribers. Often the most cost-effective way to do so is by offering bundled packages of services. The alternative is to significantly increase the cost of stand-alone voice services to levels that may be unacceptable to consumers.



of voice offerings available,<sup>92</sup> including AT&T Mobility's Wireless Home Phone service, which provides unlimited local and long distance calling within the United States for \$19.99/month

Nor is there any reason to require AT&T to remain an ETC in the trial wire centers solely to provide Lifeline. Other than AT&T, there currently are 19 providers offering Lifeline in the Carbon Hill wire center and 7 providers offering Lifeline in the Kings Point wire center. Moreover, as discussed above, AT&T will offer in the trial wire centers unlimited local and domestic long-distance calling over its Wireless Home Phone service at rates that are typically less expensive than the amount AT&T's Lifeline customers currently pay for traditional voice telephone services.<sup>93</sup> Consequently, irrespective of whether AT&T provides Lifeline service, low income customers (and, indeed, other persons with unique needs, such as seniors on fixed incomes) will continue to have access to low cost voice telephone services in the trial wire centers.

In any event, one of the objectives of these trials is to evaluate the effect the IP transition will have on customers. As broadband is ubiquitously deployed and adoption rates increase, voice is apt to become just another application that will be offered to customers. Quite simply, as the IP transition progresses, there likely will be no business case for a wireline provider to offer voice on a standalone basis. Post-transition, to the extent that companies offer "standalone" voice, they are likely to do so only at prices that are approximately the same as the price for standalone broadband service, and there is no policy reason why the Commission should compel AT&T to do otherwise during the experiment. For the reasons mentioned above, which will be described in further detail in a subsequent pleading, AT&T will request relief from their ETC obligations in the two trial wire centers.

### *6.2.3. Preserving and Enhancing Broadband Access.*

AT&T has long been committed to deploying next generation broadband facilities and services to as much of its service territory and customers as possible. Where it is economic to do so, AT&T is expanding its U-verse footprint and replacing its traditional DSL broadband technology (which is approaching the end of its life cycle) in order to provide higher-speed, IP-based wireline broadband to 57 million customer locations. In particular, AT&T is expanding U-verse—AT&T's integrated voice, data, and IPTV platform—by 8.5 million additional customer locations, for a total potential U-verse market of nearly 33 million customer locations. AT&T also plans to offer IPDSL-based service (U-verse High-Speed Internet) to nearly 24 million customer locations in its wireline service area. At the same time, AT&T is expanding its LTE deployment to reach 300 million people. As part of that initiative, AT&T will offer wireless

<sup>92</sup> See *supra* section 3.7.

<sup>93</sup> Using billing data for a one month period, the average monthly bill for traditional voice telephone services (including local telephone service with features and long distance services) for Lifeline customers in Carbon Hill was [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE] and for Lifeline customers in Kings Point it was [CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]. These amounts include the Lifeline discount.

communications alternatives (including its Wireless Home Phone, Wireless Home Phone and Internet and Wireless Business Phone services) to customers living in particularly high-cost areas. Taken together, these deployments are projected to extend high-quality IP-based broadband services (wireline, wireless or both) to 99 percent of all customer locations within AT&T's 22-state wireline service area. Those broadband services are significantly better than AT&T's legacy ATM-based DSL services, enabling customers to access the Internet faster and with better quality service than ever before.

However, AT&T cannot economically extend its next generation wireline and wireless broadband footprint to reach every corner and customer across its 22-state wireline service area, which is the case in the trial wire centers as well. As discussed above, AT&T designed these trials to ensure that they will provide an opportunity to flesh out the most challenging issues raised by the IP transition. The Carbon Hill wire center, in particular, presents geographic, economic and technical challenges. It is a sparsely populated area located in rural Alabama. These factors make it uneconomic for AT&T to extend its next generation wireline broadband network and services to all existing customer locations in Carbon Hill. Consequently, AT&T currently plans to offer such wireline IP services to approximately **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of living units in Carbon Hill. It will offer its wireless broadband voice and data services only to an additional **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of living units. AT&T has not yet found a viable replacement service for the remaining four percent of locations, and still is considering its options for those living units. AT&T recognizes that it is responsible for ensuring that these customers will have an alternative available to them prior to discontinuing TDM services, and is, in all events, committed to working with the Commission, policymakers, and other stakeholders to ensure that this happens.

Some of AT&T's existing wireline broadband customers (those purchasing traditional DSL services) reside at locations that cannot be reached by AT&T's U-verse or IP DSLAM network and services given the distance limitations of those technologies. At the same time, AT&T economically cannot maintain its legacy network (including the facilities used to provide traditional DSL services) to continue serving the relatively small number of such locations that could be reached by legacy DSL but not AT&T's U-verse VDSL or IPDSL services. In all cases, AT&T will be able to offer those customers wireline or wireless broadband services. In Carbon Hill, **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of existing consumer DSL customers will have only a wireless broadband service available from AT&T. The remaining **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent will have a wireline broadband replacement available from AT&T, and most of these also will have access to a wireless broadband service. In Kings Point, **[CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE]** percent of existing consumer DSL customers will have only a wireless broadband service available from AT&T. The remaining approximately **[CONFIDENTIAL –**



**NOT FOR PUBLIC DISCLOSURE]** percent will have wireline broadband replacement available from AT&T, and most of these also will have access to a wireless broadband service.

#### *6.2.4. Maintaining Quality of Service.*

As the Commission itself recognizes, converged IP networks are far more dynamic, versatile, resilient, and efficient than the single-purpose TDM networks they are replacing. IP networks (both wireline and wireless) thus enable a variety of new services, features and functions that will benefit customers and provide a platform for growth and innovation. It is important not to lose sight of this enormous potential amidst fears that not everything will be exactly the same or that certain functionalities will be lost as the transition proceeds. If customers experience significant net benefits from the transition — which they will — then the transition is in the public interest. But, if service providers end up designing their IP networks and services simply to replicate the features, functions and capabilities of legacy TDM networks and services, the IP Transition will be a failure insofar as customers will not realize the full benefits offered by the transition. As AT&T previously has explained,<sup>94</sup> the transition to all-IP services will entail trade-offs, and not every feature and function offered over TDM will be available or will work in the same manner during and after the transition.

In designing the wireline and wireless IP-based services that it will offer in place of legacy TDM services, AT&T has sought to carry over those features and functions that customers demand, and that are necessary to meet the foregoing fundamental principles and values. In some cases, the features and functions of those replacement services differ from those of existing services. For example, voice quality on CMRS networks and services currently differs from that of traditional, TDM voice services (which were designed solely to transmit voice communications). Nonetheless, over 40 percent of American households have cut the cord entirely and rely solely on CMRS service for their voice communications needs. And millions of these rely on CMRS to connect traditional telephone handsets to the PSTN (*e.g.*, through AT&T's Wireless Home Phone and other comparable services). The question then is whether the differences in features and functions between legacy TDM services and their wireless and wireline IP replacements are nonetheless acceptable, and thus whether those replacements are reasonable and adequate alternative to TDM,<sup>95</sup> which are some of the questions these trials are intended to address.

Of course, IP services are continuing to evolve, and they undoubtedly will provide even greater levels of functionality and higher quality to users than they do now. Today, wireline VoIP services offer sound quality as good as or better than the sound quality customers have come to expect from TDM voice services. That was not always the case. And even if some

<sup>94</sup> See Reply Comments of AT&T Services, Inc., GN Docket No. 13-5, at 9-12 (filed Aug. 7, 2013).

<sup>95</sup> As the tens of millions of customers that have cut the cord and rely solely on wireless for voice communications both in and outside their homes demonstrate, that would appear to be the case with wireless voice quality.

customers do not deem the sound quality of CMRS to be as good as traditional POTS, that quality will only get better as wireless providers expand their deployment of LTE, which will enable high-definition (“HD”) voice, which, in turn, is expected to provide audio quality superior to traditional POTS services. But these innovations will never get off the ground if the transition is bogged down by misguided calls to replicate every facet of the TDM network.

In this plan, AT&T has identified the features and functions of its wireless and wireline IP replacement products (including those already available and those that will be implemented in the course of the trial along with a timeline showing when they will be available). It also has identified whether and how they differ from TDM to ensure all interested parties understand the impact of, and can appropriately prepare for, the IP transition. AT&T believes its IP replacement services (most of which already are available in the market today) provide appropriate and, in many cases, superior substitutes for the legacy TDM services it will discontinue as the IP transition proceeds. We welcome a dialogue with consumers, policymakers and others regarding any potential gap in technology or services they may identify, and whether and by whom such gap should be filled.

### 6.3 COMPETITION

#### 6.3.1. *Maintaining Wholesale Access.*

As is the case with AT&T’s end user retail customers, a complete test of the transition would entail the required participation of all actors in the test wire centers, including wholesale customers. AT&T nevertheless is prepared to move forward with trials in the test wire centers subject to the condition established in the *Transition Trials Order* limiting the involvement of wholesale customers at the initiation of the trial to those that participate *voluntarily*.<sup>96</sup> In this section, AT&T describes its plans for addressing the other conditions and presumptions established in the *Order* and its Appendix B that are pertinent to our wholesale customers.<sup>97</sup>

Non-affiliated carriers currently are purchasing wholesale services in both proposed test wire centers.<sup>98</sup> As might be expected for a wire center of its size and rural location, the Carbon Hill wire center has less wholesale activity than Kings Point. The most recent data available shows that the bulk of the wholesale services that non-affiliated carriers purchase in Carbon Hill involves CLECs purchasing either AT&T’s Local Wholesale Complete™ (LWC) commercial product or retail services for resale, although other carriers also are purchasing DS1 special access circuits for what appears to be wireless backhaul.

<sup>96</sup> *Technology Transition Trials Order*, ¶ 59 and n.91. As the *Order* contemplates (*id.*, n.91), AT&T expects to pursue additional phases of these trials that would include, with the Commission’s authorization through the Section 214 process, the complete withdrawal of TDM-based wholesale services. To that end, AT&T has identified in the product data sheets in Exhibit E the interstate TDM wholesale services for which 214 applications will be filed, and anticipates submitting an application to grandfather those services in the trial wire centers on July 1, 2015, with the goal of sunseting TDM wholesale services there by March 31, 2017.

<sup>97</sup> See *id.*, ¶¶ 59-64 and App. B, ¶¶ 35-39.

<sup>98</sup> AT&T is continuing to research the specific extent of wholesale activity in each wire center, and will supplement this filing at an appropriate time to incorporate information regarding such activity.



In contrast, far more wholesale customers are active in the Kings Point wire center, and they purchase wholesale services in greater volumes than in Carbon Hill, which is not surprising, given the relatively larger and denser population and suburban location of that wire center. Those customers are a diverse group, including large national wireless carriers, some of the nation's largest CLECs, and smaller, regional carriers. The TDM-based products and services they purchase are just as diverse, and encompass not only the commercial LWC product, but also switched Ethernet services, legacy DSn-level special access services, unbundled network elements (including 2-wire voice grade loops, unbundled DSL capable loops, 2- and 4-wire digital loops, and DS-1 enhanced extended loops), and resold consumer and business retail services.

As we stated at the outset of this submission, AT&T values its relations with its wholesale customers, and intends to work aggressively to retain their business as the entire industry undergoes the transition to an all-IP ecosystem. Accordingly, AT&T has identified the replacement products that already are available as alternatives to current legacy TDM services – such as the AT&T Switched Ethernet (ASE) service that is available to replace DSn-level special access services and high capacity loop and transport UNEs – and will provide customers who choose to do so the opportunity to transition to those alternatives in this initial phase of the trial. AT&T also will continue to meet its wholesale obligations under Section 251(c) of the Act, including by making UNEs available through the current stage of the trial. At the same time, wholesale customers will have the opportunity to obtain bare copper loops and utilize their own electronics to provide high capacity services to their end user customers.<sup>99</sup> AT&T also is working diligently to develop IP replacement services, which it intends to make available for resale to wholesale customers on commercial terms. AT&T's objective is to complete those development efforts, as well as those aimed at developing an IP-based alternative to the LWC product, as soon as possible, although it is likely the final commercial products will not be available until the trials already are underway.

AT&T's wholesale marketing plan for the initial stage of the proposed trials is straightforward: we will proactively engage our wholesale customers in these wire centers to offer them the opportunity voluntarily to migrate from their existing TDM-based services and products to the available replacement products. This process will include normal methods for contacting wholesale customers on an industry-wide basis (such as through accessible letters),<sup>100</sup> and direct outreach by sales teams to the customers identified as active in these wire centers.

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<sup>99</sup> The *Technology Transition Trials Order* stated that the Commission did not intend to resolve legal and policy questions resulting from the transition in the context of any trials. *Id.*, ¶ 8. Consistent with the Commission's intent, AT&T is not seeking to resolve any issues through this application, nor in this phase of the proposed trial, on such issues, including those concerning the extent to which wholesale obligations associated with an ILEC's provision of TDM-based services, such as the required unbundling of high capacity loops or the resale of telecommunications services, apply to IP-based services.

<sup>100</sup> These larger industry outreach efforts are important because the universe of potential customers in these wire centers is not limited to those that already are active there. For example, any CLEC authorized to provide service in the states of Alabama or Florida could elect to participate in the trial.

Finally, and as noted previously, the Commission established specific conditions and presumptions that are intended to ensure that parties seeking to engage in transitions-related trials secure and support the core value of Competition in the course of any proposed trials. AT&T embraces that core value, and shares the Commission's goal of preserving it in the proposed wire center trials. Accordingly, AT&T addresses each of those conditions and presumptions below:

a. Wholesale Access

As noted above, and as required in the *Order*,<sup>101</sup> any participation by wholesale customers in this first phase of the proposed wire center trials will be entirely voluntary. No customer will be forced to migrate to alternative services or products, or to alter its current wholesale arrangements with AT&T during the initial phase of the trials. In particular, the same wholesale customers that currently use AT&T's network in these wire centers will continue to be able to do so during this phase of the proposed trials.<sup>102</sup> There are no plans to change the types of wholesale access that customers who do not participate in the initial phase of the trial currently receive, or to alter the price or cost of that access.<sup>103</sup> As for those customers that do voluntarily elect to participate, that decision undoubtedly will be driven by their determination that the alternative service is at least functionally equivalent to the original – and more likely better -- and provides greater value for that level of functionality. For example, the ASE service provides significantly higher, and scalable, bandwidth than the legacy TDM DSn service it replaces. Again, participation at the initiation of the proposed trials is entirely voluntary on the part of our wholesale customers, and we fully anticipate that any customer considering doing so – especially these sophisticated wholesale customers – will drive a hard bargain in that process – and that the end results of those negotiations would likely encompass terms such as those identified by the Commission in Appendix B.<sup>104</sup>

b. Interconnection

AT&T's proposed test satisfies the condition established in the *Order* “to maintain the status quo in providing interconnection arrangements to both existing and new customers.”<sup>105</sup> In particular, the proposed trial will not result “in the cessation or impairment of service” for either other providers or end user customers.<sup>106</sup> Obviously, the interconnection arrangements necessary to carry traffic to and from the embedded base of TDM customers in these wire centers will be unaffected during the first phase of the trials for one very obvious reason – those customers are not required to participate in the trial. But the same holds true for traffic destined to new retail

<sup>101</sup> *Id.*, ¶ 59.

<sup>102</sup> *See id.*, App. B, ¶ 35 (applicant must “ensure that the same types of wholesale customers can continue to use its network. . .”).

<sup>103</sup> *See id.*

<sup>104</sup> *See id.* (describing terms that would apply purchases of alternative services to discounts for purchases “outside of the experiment areas” and waiver of early termination fees “if early termination is caused by the experiment.”).

<sup>105</sup> *Id.*, ¶ 61.

<sup>106</sup> *See id.*, ¶ 62.



customers, who may be required in the trial to utilize either U-verse Voice or Wireless Home Phone as alternatives to legacy TDM wireline retail services, and those existing customers who voluntarily elect to make the transition in the trial. This again is true for one very simple reason - the interconnection arrangements necessary to terminate traffic to AT&T's VoIP voice customers or to its Wireless Home Phone customers, as opposed to TDM customers, already are present in the market and are being used to successfully carry that traffic.

To be clear, the exchange of traffic for customers subscribing to those IP replacement services will entail differences in call routing from that for customers subscribing to AT&T's legacy wireline TDM services. For example, a call from a CLEC end user customer to an AT&T consumer VoIP customer would be routed through AT&T's access tandem for delivery to AT&T's affiliate serving the customer. This might mean a change in routing for a provider that had established direct end office trunking at the AT&T ILEC central office in order to terminate calls to AT&T's legacy TDM customers. Similarly, a call from an IXC customer to an AT&T customer subscribing to the Wireless Home Phone product would also utilize trunking to the AT&T access tandem or a competitive transit provider.<sup>107</sup> But this is nothing new because customers already are utilizing these existing trunking arrangements outside of the trials, and thus these types of changes in trunking and routing arrangements exist in the marketplace today without raising any issues. And AT&T's proposed trials will not negatively affect that status quo.

By the same token, any changes in costs associated with changes in these routing protocols already are being captured in the market. And given the small size of the Carbon Hill wire center, and the overall limitations imposed in the *Order* on the customers in either wire center who can be required to subscribe to the IP-based services (that is, only *new* retail customers), there should be no material cost impact on interconnecting carriers attributable to this phase of the trials, since the arrangements carriers already have implemented to carry traffic to and from VoIP and Wireless Home Phone customers are plainly sufficient to meet existing demand. Moreover, as the transition proceeds, carriers also will likely experience cost savings as they eliminate existing direct end office trunking arrangements that no longer would be necessary to reach TDM customers.

Finally, the *Order* notes that the Commission wants to "be able to evaluate whether customers in experiment arenas will be able to select their own interexchange carrier (IXC) and how IXCs will terminate interstate interexchange or international calls to customers participating in the experiment."<sup>108</sup> Taking these issues in reverse order, AT&T's proposed wire center trials will have no effect on how IXCs terminate interstate interexchange or international calls to customers participating in the experiment. Any such calls will continue to be routed to U-verse Voice and Wireless Home Phone customers as they are today. As for the first issue, retail customers who voluntarily choose to participate in the trials -- and thus to subscribe to either U-verse Voice or Wireless Home Phone -- will not select a separate IXC to carry long distance

<sup>107</sup> To the extent a provider has direct interconnection arrangements with AT&T Corp. or AT&T Mobility, the traffic will be exchanged with AT&T over those existing interconnection arrangements.

<sup>108</sup> *Id.* Contrary to the suggestion in the *Technology Transition Trials Order*, no additional guidance on these issues is provided in Appendix B.

calls. Indeed, assuming it is even technically feasible, imposing such a requirement on these IP-based services would be prohibitively expensive and fundamentally at odds with the “any distance” nature of IP services themselves.<sup>109</sup> As the *Order*’s portrayal of the history of transformative technology transitions suggests, these trials are about testing effects of deploying network infrastructure “that can conquer space and time. . . .”<sup>110</sup> Constraining those tests with anachronistic concepts rooted in discrete markets for local, intraLATA, interLATA and interstate traffic that no longer reflect customer preferences and marketplace conditions would be counterproductive.<sup>111</sup>

### 6.3.2. Intercarrier Compensation.

During the trials, AT&T will maintain the intercarrier compensation *status quo ante* in accordance with the Commission’s *USF/ICC Transformation Order*,<sup>112</sup> including the transition to bill-and-keep in these wire centers. AT&T’s VoIP and Wireless Home Phone services are and will remain subject to the existing intercarrier compensation regimes for VoIP-PSTN or CMRS traffic, as appropriate.

Intercarrier compensation revenues and obligations would change only due to customers’ shifts between services subject to different intercarrier compensation regimes rather than any impact from the trial itself. For example, if an end user chooses Wireless Home Phone instead of POTS, compensation for terminating calls to that customer would be the compensation regime applicable to CMRS, rather than the wireline compensation regime. That is a function of the intercarrier compensation regime itself and is the case anytime a customer switches, even outside a trial. AT&T does not and will not as part of the trial charge subscriber line charges (“SLCs”) or access recovery charges (“ARCs”) on VoIP or Wireless Home Phone services. Accordingly, AT&T seeks no new authorization to tariff or otherwise charge SLCs or ARCs for the customers

<sup>109</sup> Cf. *Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, Memorandum Opinion and Order, WC Docket No. 03-211 (Nov. 12, 2004), at ¶ 14 (finding that the characteristics of Vonage’s VoIP service “preclude any practical identification of, and separation into, interstate and intrastate communications for purposes of effectuating a dual federal/state regulatory scheme. . .”).

<sup>110</sup> *Id.*, ¶ 11.

<sup>111</sup> It is clear that any equal access obligations that are now captured in the provisions of the 1996 Act will no longer apply in an all-IP environment. For example, the dialing parity requirement established in 47 U.S.C. §251(b)(3) is imposed on Local exchange carriers.” Thus, insofar as AT&T, as a VoIP provider, is not providing that service as a common carrier and no longer will provide telephone exchange service or exchange access, it no longer would be subject to that obligation. The provision also would be inapplicable to VoIP service, which is by its nature distance agnostic, because it is not properly classified as “telephone exchange service” or “telephone toll service.” See 47 U.S.C. §153(54), (55) (defining “telephone exchange service” and “telephone toll service”).

<sup>112</sup> See generally *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011) (subsequent history omitted).



in the trial. In addition, the trials as proposed should not have material impact on AT&T's Eligible Recovery.<sup>113</sup>

Finally, AT&T agrees that policy issues, including those related to compensation between providers in an all-IP environment, are appropriately addressed outside of the trials,<sup>114</sup> and as the Commission notes, it "need not address these issues before proceeding with the experiments."<sup>115</sup> As noted above, these trials will not affect wholesale access or interconnection, and therefore, resolving policy and legal issues related to compensation for IP interconnection is not within the scope of this trial. In any event, AT&T does not intend to test IP-to-IP interconnection in the context of these wire center trials; indeed, as AT&T noted in prior comments on this issue, because interconnection arrangements in an all-IP world will not be based around LATA (or even state) boundaries, much less even more limited wire center boundaries, and also will not respect artificial distinctions between "local" and "long-distance" services, and are highly unlikely to be limited to "voice," running geographically limited trials of IP-based interconnection makes little sense.<sup>116</sup>

#### 6.4 CONSUMER PROTECTION

##### 6.4.1. *Customer Privacy.*

AT&T will conduct all aspects of the trial consistent with the AT&T Privacy Policy, which applies to our legacy TDM services, as well as IP-based services. In addition, AT&T will continue to comply with applicable privacy laws and regulations, including those concerning customer proprietary network information (CPNI). AT&T has established comprehensive processes and procedures designed to ensure compliance with the Commission's CPNI regulations.<sup>117</sup> Accordingly, pursuant to the Commission's 2007 order extending the CPNI regulations to interconnected VoIP providers, the AT&T business units that provide interconnected VoIP services – AT&T Business, AT&T Home Solutions and AT&T Mobility – apply these processes and procedures today to safeguard the CPNI of AT&T's interconnected VoIP customers.<sup>118</sup> AT&T's CPNI processes and procedures are described in AT&T's annual CPNI compliance certifications filed with the Commission pursuant to 47 C.F.R. § 64.2009, and

<sup>113</sup> 47 C.F.R. § 51.915(d).

<sup>114</sup> See *USF/ICC Transformation Order* at paras. 1335-98 (seeking comment on IP-to-IP interconnection issues).

<sup>115</sup> *Technology Transition Trials Order* at ¶ 64; see also *id.* at ¶ 8.

<sup>116</sup> *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, GN Docket 13-5, Comments of AT&T (July 8, 2013), at 20-27.

<sup>117</sup> 47 C.F.R. § 64.2001 *et seq.*

<sup>118</sup> See *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information*, 22 FCC Red. 6927, ¶¶ 54-59 (2007).

will apply to all CPNI generated in connection with the interconnected VoIP services used in the trial.<sup>119</sup>

#### 6.4.2. *Truth-in-Billing.*

During the trial, AT&T will comply fully with the Commission's truth-in-billing, slamming and cramming requirements in its provision of next-generation wireless and IP-based services regardless of the regulatory classification of those services. As discussed above, AT&T will offer consumers its Wireless Home Phone service, VoIP, or both, in place of TDM-based voice services during the trial. AT&T's Wireless Home Phone service is a commercial mobile radio service that is subject to (and complies with) the truth-in-billing rules, and that will not change during and after the trials.<sup>120</sup>

Although AT&T's VoIP services are properly classified as information services, and thus not subject to the Commission's truth-in-billing (or cramming) rules, AT&T's bills for those services would comply with the truth-in-billing requirements if they did apply. As the attached samples of the bills AT&T renders for VoIP services demonstrate,<sup>121</sup> those bills are clearly organized, include a brief description of the services provided and the charges therefor, as well as contact information about how to make inquiries about or contest the charges on the bill. In addition, AT&T does not bill for other providers' services or products on its bills for VoIP service. Moreover, insofar as AT&T's VoIP services are all-distance voice services that allow unlimited domestic voice calls, AT&T's bills have no need to, and do not distinguish, between deniable and non-deniable charges. As a consequence, customers purchasing AT&T's VoIP services will continue to receive the protections of the truth-in-billing (and concomitantly the Commission's slamming and cramming) requirements throughout the trial.

AT&T also will comply fully with the Commission's prohibition against unauthorized service changes in its slamming rules in its provision of Wireless Home Phone or VoIP services. In order to utilize either service, customers will require additional CPE to which they can attach their existing telephone set. Specifically, Wireless Home Phone customers will need a Wireless Home Phone device, which provides the transmitter/receiver necessary to connect to AT&T's radio access network (RAN). Likewise, VoIP customers will need a residential gateway, which both receives and transmits voice packets in IP, and converts them to and from analog for transmission to and from a customer's voice handset. As a consequence, both services will require customer cooperation and approval to switch from TDM to next generation voice services, and thus unauthorized service changes simply are not possible.

<sup>119</sup> See, e.g., AT&T Annual CPNI Compliance Certifications Calendar Year 2012, EB Docket No. 06-36, filed Mar. 1, 2013; AT&T Annual CPNI Compliance Certifications Calendar Year 2011, EB Docket No. 06-36, filed Mar. 1, 2012; AT&T Annual CPNI Compliance Certifications Calendar Year 2010, EB Docket No. 06-36, filed Mar. 1, 2011.

<sup>120</sup> Attached hereto is a sample bill for AT&T's Wireless Home Phone service. See Exhibit H.

<sup>121</sup> See Exhibit H.



#### 6.4.3. *Number Portability.*

The Commission has directed that, for any experiments, its “number portability rules and policies will continue to apply,”<sup>122</sup> and asks whether “other providers’ customers could potentially be affected by a proposed experiment” and whether “the ability of other providers’ customers to keep and port their numbers will not be jeopardized.”<sup>123</sup> In the Trial Wire Centers, AT&T will replace legacy TDM services with interconnected VoIP and CMRS services that already are in the market. These services are subject to and fully comply with the Commission’s number portability rules and policies. As a consequence, both AT&T’s customers and the customers of competing providers will be able to port their numbers during the trial to the same extent that they are able to port their numbers today.

#### 6.4.4. *Routing.*

AT&T strongly supports the Commission’s efforts to ensure the reliable and efficient operation of the nation’s telephone network and that will be no different under the trials.<sup>124</sup> AT&T’s VoIP and Wireless Home Phone services are already operational and available in the market. All call completion, routing and signaling will be handled under the trial as it is today for these services. AT&T holds itself and its vendors to high standards for handling all traffic. Our customers expect as much from AT&T. AT&T ensures proper, high-quality routing and signaling through internal procedures, including rigorous oversight of vendors,<sup>125</sup> and compliance with industry best practices.<sup>126</sup> Moreover, AT&T’s VoIP and Wireless Home Phone services are subject to the *Rural Call Completion Order*<sup>127</sup> and the signaling rules under the *USF/ICC Transformation Order*.<sup>128</sup> AT&T will continue to operate these services in the trial consistent with the terms of these orders and rules.<sup>129</sup> Together, the Commission’s rules,

<sup>122</sup> *Technology Transition Trials Order*, ¶ 68.

<sup>123</sup> *Id.*, Appendix B, ¶ 42.

<sup>124</sup> See *Rural Call Completion*, WC Docket 13-39, Comments of AT&T (May 13, 2013) (AT&T RCC Comments); *Rural Call Completion*, WC Docket 13-39, Reply Comments of AT&T (June 11, 2013) (AT&T RCC Reply).

<sup>125</sup> See AT&T RCC Comments at 3 (citing Presentation of Penn Pfautz, AT&T, FCC Rural Call Completion Workshop (Oct. 18, 2011), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-310507A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-310507A1.pdf); Statements of Kim Meola, AT&T & Penn Pfautz, AT&T, Rural Call Completion Workshop video, available at <http://www.fcc.gov/events/rural-callcompletion-workshop> (describing AT&T’s practice of limiting by contract the services provided by call termination suppliers to one additional intermediate provider)); AT&T RCC Reply at 2.

<sup>126</sup> AT&T complies with and has been actively involved in development of best practices through ATIS. See “Alliance for Telecommunications Industry Solutions, ATIS Standard on Intercarrier Call Completion/Call Termination Handbook,” ATIS-0300106, available at <<http://www.atis.org/docstore/product.aspx?id=26780>> (rel. Mar. 2013).

<sup>127</sup> See generally *Rural Call Completion*, WC Docket No 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154 (2013) (*RCC Order*).

<sup>128</sup> See *USF/ICC Transformation Order* at paras. 702-35.

<sup>129</sup> Both the *RCC Order* and the signaling portion of the *USF/ICC Transformation Order* provide for waivers of the rules under certain circumstances. See *RCC Order* at paras. 95-97; *USF/ICC Transformation Order* at 723. AT&T

AT&T's company procedures, and industry best practices ensure that no systemic routing problem exists, and when an isolated problem is identified, AT&T can quickly and effectively resolve the issue. AT&T expects the trial to raise no key technical issues that would affect routing or signaling but to the extent a routing or signaling concern surfaces, even if unrelated to the trial, AT&T will work promptly and cooperatively toward a resolution.

## 6.5 DATA COLLECTION AND REPORTING

As part of the trials, AT&T will collect and report to the Commission a variety of data, including data regarding the progress of the trial, customer complaints, network performance, call quality, and issues relating to access by persons with disabilities. This section describes these data below.

### 6.5.1. *Quarterly Transition Progress Report*

AT&T will track and report the number of customer migrations from TDM products to IP products by wire center. The report will classify migrations by the replacement product category (*i.e.*, wireline or wireless) and market segment (*i.e.*, consumer, business and wholesale).

### 6.5.2. *Quarterly §214 Customer Notification Report*

The Customer Notification Report provides a summary of Section 214 grandfather and sunset customer notifications by AT&T to TDM trial customers. The report will summarize by product the date of notification and the number of customers notified.

### 6.5.3. *Quarterly Customer Issues Report*

AT&T will provide a summary of trial-specific customer issues. Data will be collected from: direct customer input to trial-specific web sites, calls to AT&T customer care centers and issues identified by AT&T field representatives having customer contact. AT&T will classify issues in a way that is reflective of the type of issues customers are describing, such as: accessibility, product availability or product performance.

### 6.5.4. *Quarterly Defects Per Million (DPM) Report*

AT&T will track and report quarterly data concerning the performance of the wireline IP-based voice services, and the TDM voice services they replace. For each trial wire center, AT&T will select a nearby wire center to serve as a "control group" to ensure that both the trial and control wire centers are subject to similar weather conditions, traffic congestion, and other

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has petitioned for a limited waiver of the signaling rules adopted in the *USF/ICC Transformation Order*. See *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Petition for Limited Waiver of AT&T (Dec. 29, 2011). In addition, AT&T expects to request a waiver of certain reporting requirements pursuant to the terms of the *RCC Order*. See Letter to Marlene H. Dortch, Secretary, FCC from Brian Benison, Director, Federal Regulatory, WC Docket No. 13-39 (filed Jan. 17, 2014) (providing notice of meeting with FCC staff to discuss a possible waiver proposal).



network-affecting events. AT&T will provide performance data for the two trial wire centers, and the same data for the two control wire centers. In each case, AT&T will provide a metric based on the number of blocked or dropped calls. A defect generally equates to a blocked or dropped call.<sup>130</sup> By treating each blocked and/or dropped call as a "defect," this report will enable AT&T to provide a legitimate comparison of the performance of AT&T's legacy TDM voice services and its wireless and wireline IP-based replacement services. Although the report format is still under development, the specific metrics AT&T plans to report are:

**TDM DPM (Total blocked calls/total attempts) x 1M**

- **Description:** For TDM, the DPM metric includes defects attributable to regional and long distance network events like equipment, engineering, transport, process or software. A defect is defined as a blocked call.

**VOIP DPM (Total blocked/dropped calls/total attempts) x 1M**

- **Description:** For VoIP (Both CVOIP and BVOIP), the DPM metric includes defects attributable to AT&T's VoIP elements, along with those resulting from transport, process or software related defects within the AT&T network. A defect is defined as a blocked or dropped call.

**Wireless Network Performance**

- **Description:** Measurement of Accessibility and Retainability, which defines the customer's ability to make and retain a call on the wireless network. Accessibility = percent of attempted calls that are successfully established and allow voice communication to begin while retainability = percent of voice calls that are successfully carried for the duration of the conversation.

*6.5.5. Access by Persons with Disabilities*

Due to the wide range of potential accessibility needs that AT&T may encounter in the trial wire centers, we believe that qualitative data concerning issues or problems involving persons with disabilities will be more instructive than quantitative data. Accordingly, AT&T will: (1) separately track and report on a quarterly basis complaints to AT&T's Office of the President from the trial wire centers where a customer self-identifies him- or herself as having a disability, or the customer's issue relates to assistive technology; and (2) ask disability organizations that are assisting AT&T with the trial to record and report to AT&T any feedback that they receive in connection with their outreach to persons with disabilities.

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<sup>130</sup> Wireless performance measures utilizes a slightly different variation based on percent of attempted calls that are successfully established and allow voice communication to begin and percent of voice calls that are successfully carried for the duration of the conversation.

#### 6.5.6. *Quarterly IP Network Outage Report*

AT&T also will submit in the record of this proceeding a quarterly report summarizing network outages that affected voice services in a trial wire center area that were reported to the FCC via NORS, pursuant 47CFR Part 4.

#### 6.5.7. *Voice Quality Metric*

AT&T has compared the voice quality of its legacy TDM voice services with the quality of its VoIP and Wireless Home Phone services by conducting a Mean Opinion Score (MOS) test for each service. MOS provides a numerical measure of the quality of human speech at the destination end of a circuit. MOS has been used for decades in telephone networks to provide the human user's view of the quality of the service. MOS tests for voice are specified by ITU-T recommendation P.800. The U-verse Voice and Wireless Home Phone sections of the report represent the experimental result and the PSTN section of the report represents the control result.

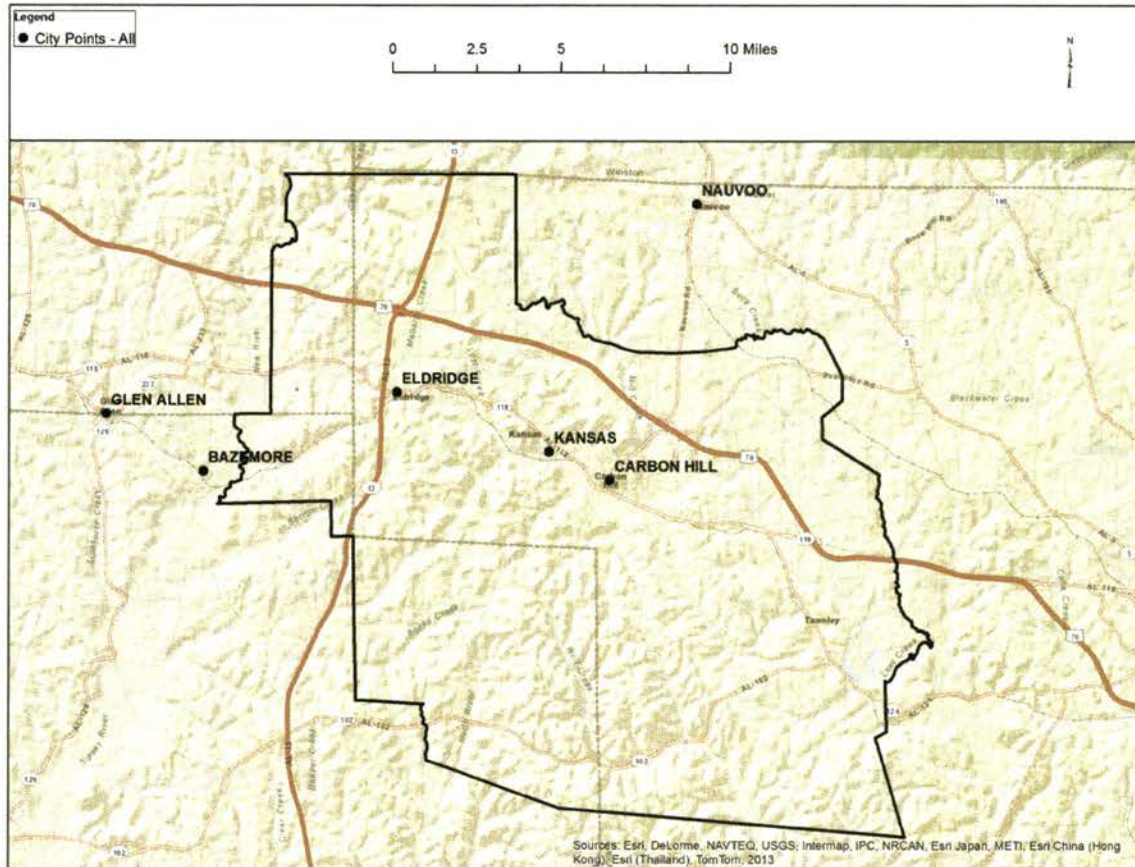
| Voice Quality MOS |                |        |
|-------------------|----------------|--------|
| AT&T              | AT&T           | AT&T   |
| PSTN              | U-verse® Voice | WHP    |
| ██████            | ██████         | ██████ |

## Section 7: Exhibits



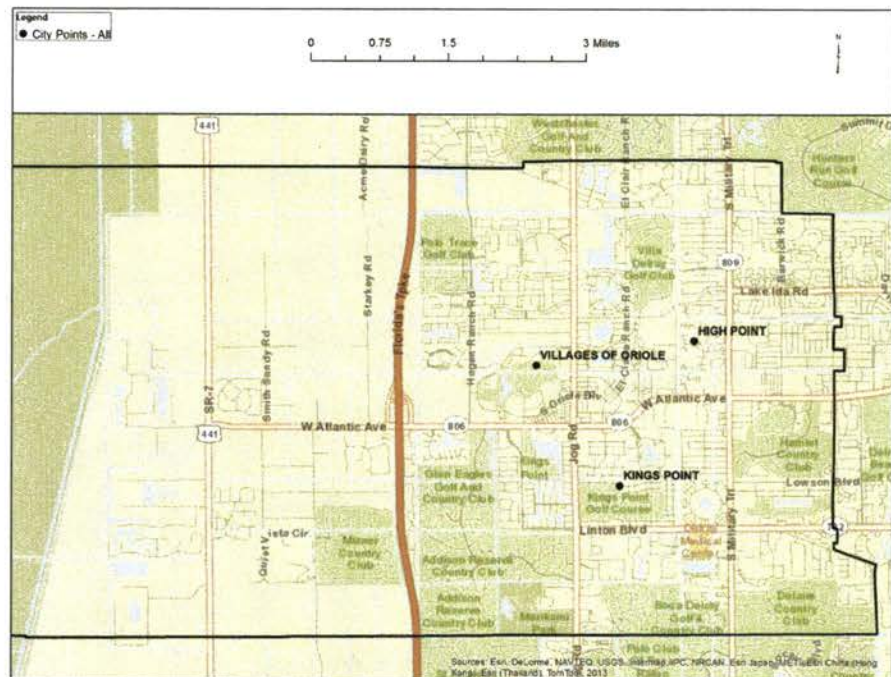
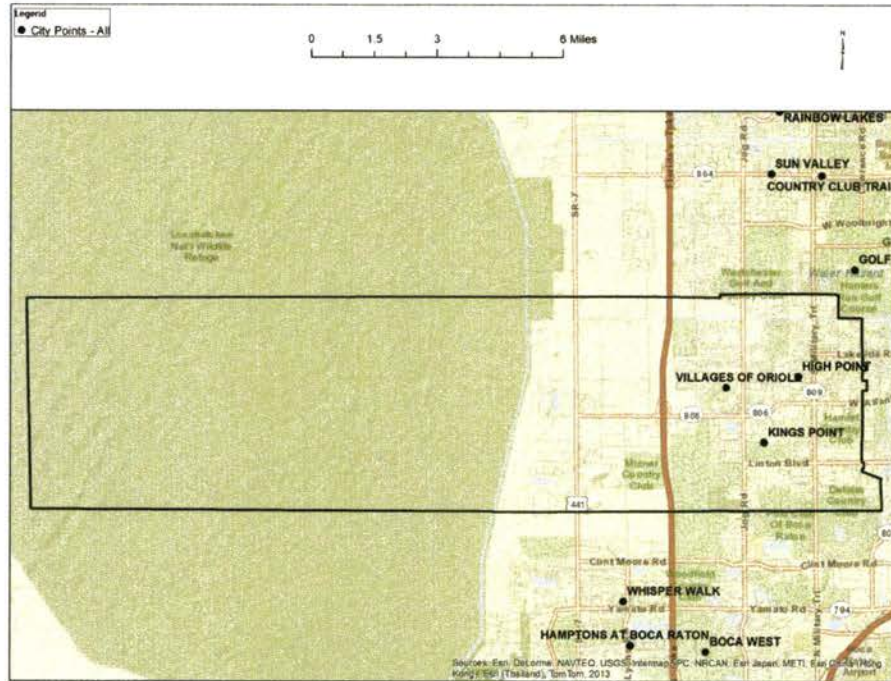
# Exhibit A

## Carbon Hill, AL SWC Area Coverage Map





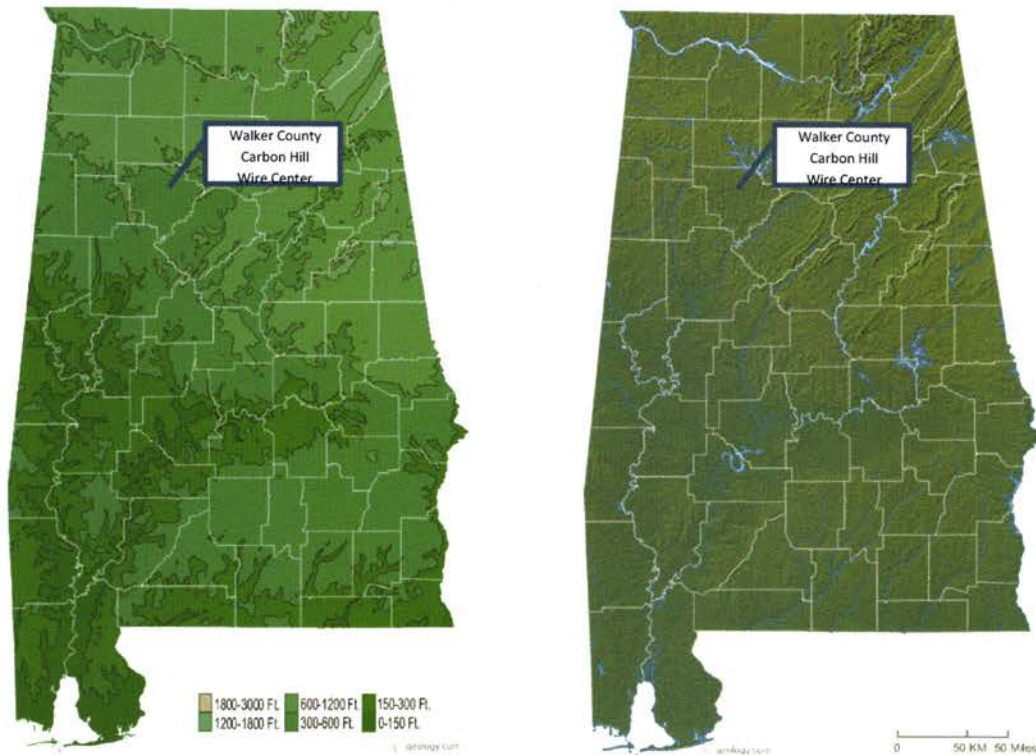
## Kings Point, FL SWC Area Coverage Map



# Exhibit B



Walker County, location of the Carbon Hill Wire Center<sup>1</sup>



<sup>1</sup> See Geology.com, Alabama Map Collection, available at <http://geology.com/state-map/alabama.shtml> (visited Feb. 24, 2014).

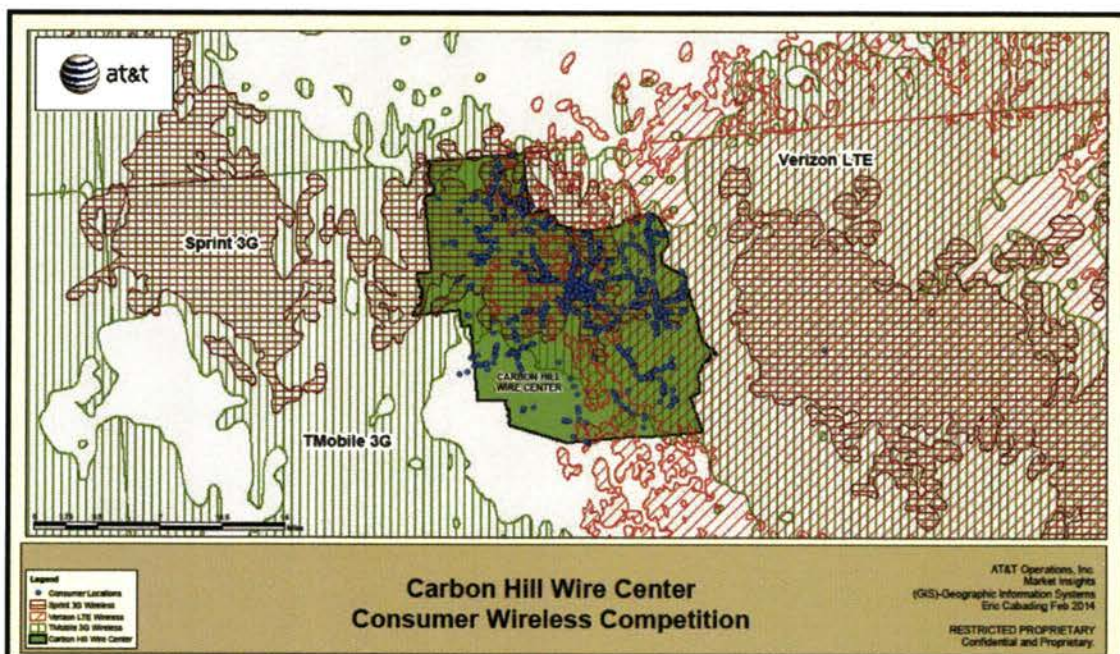
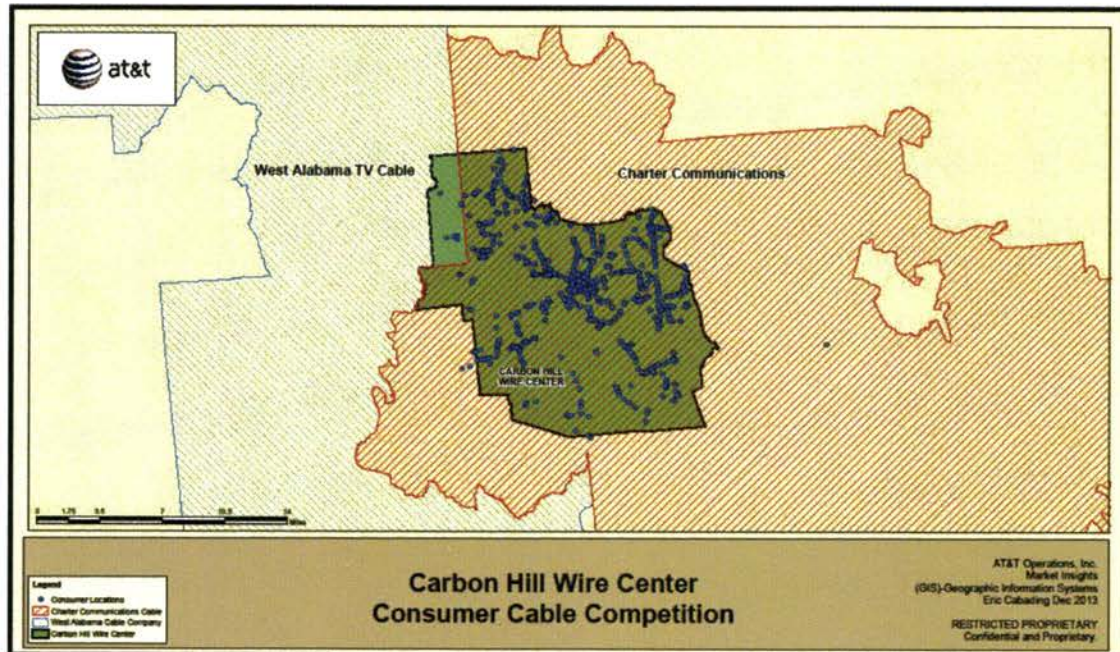
## Palm Beach County, location of the Kings Point Wire Center<sup>2</sup>



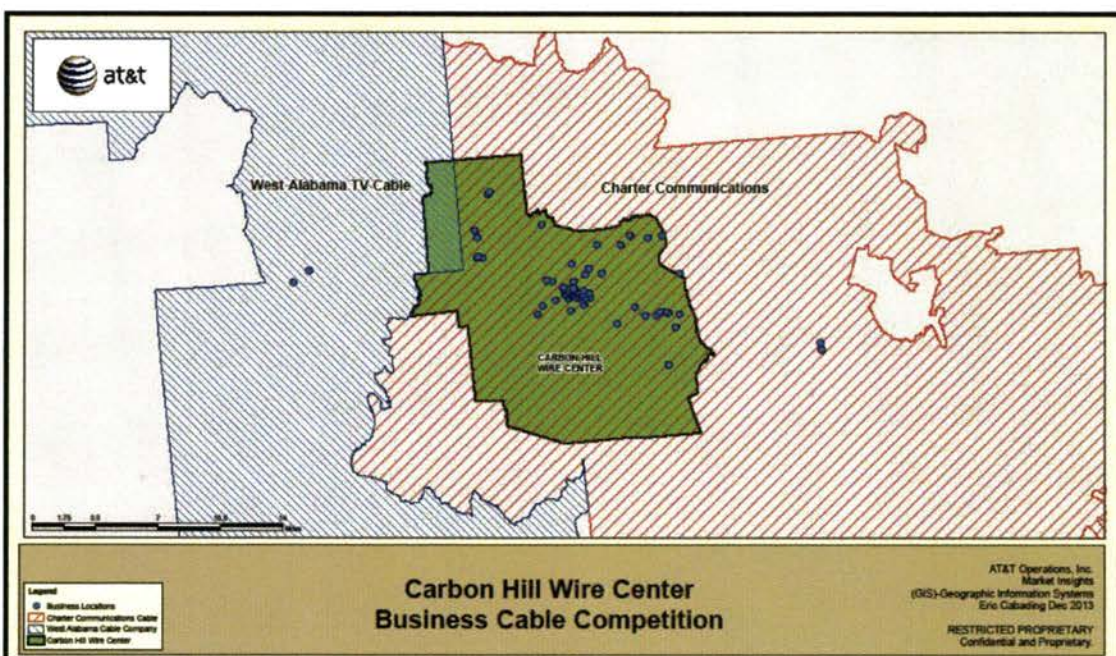
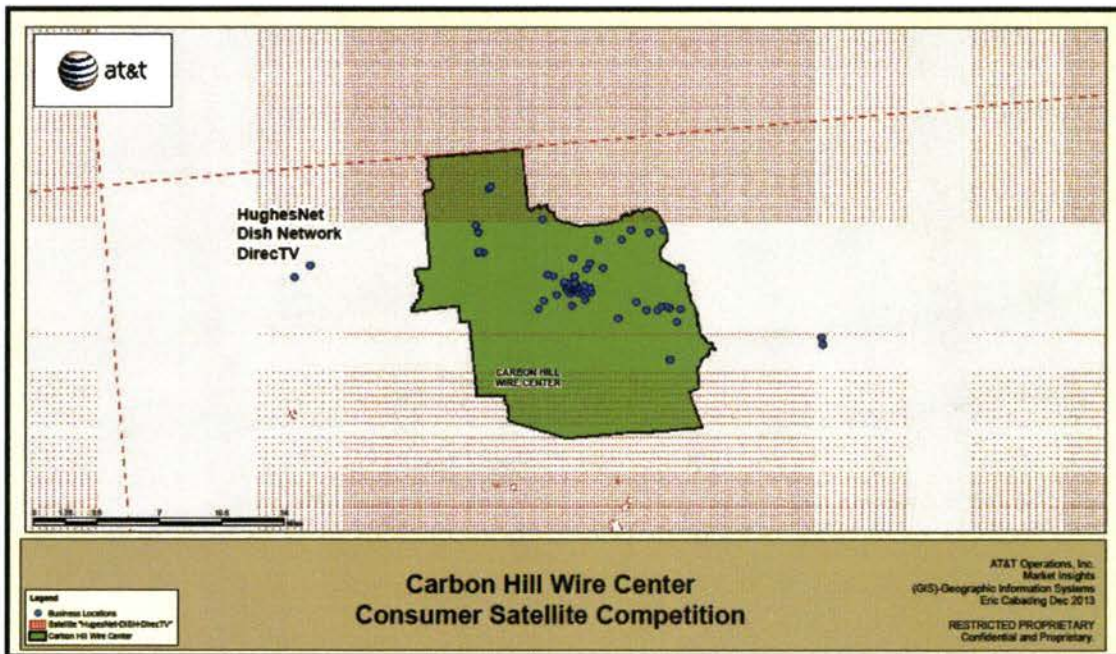
<sup>2</sup> See Geology.com, Florida Map Collection, available at <http://geology.com/state-map/florida.shtml> (visited Feb. 24, 2014).



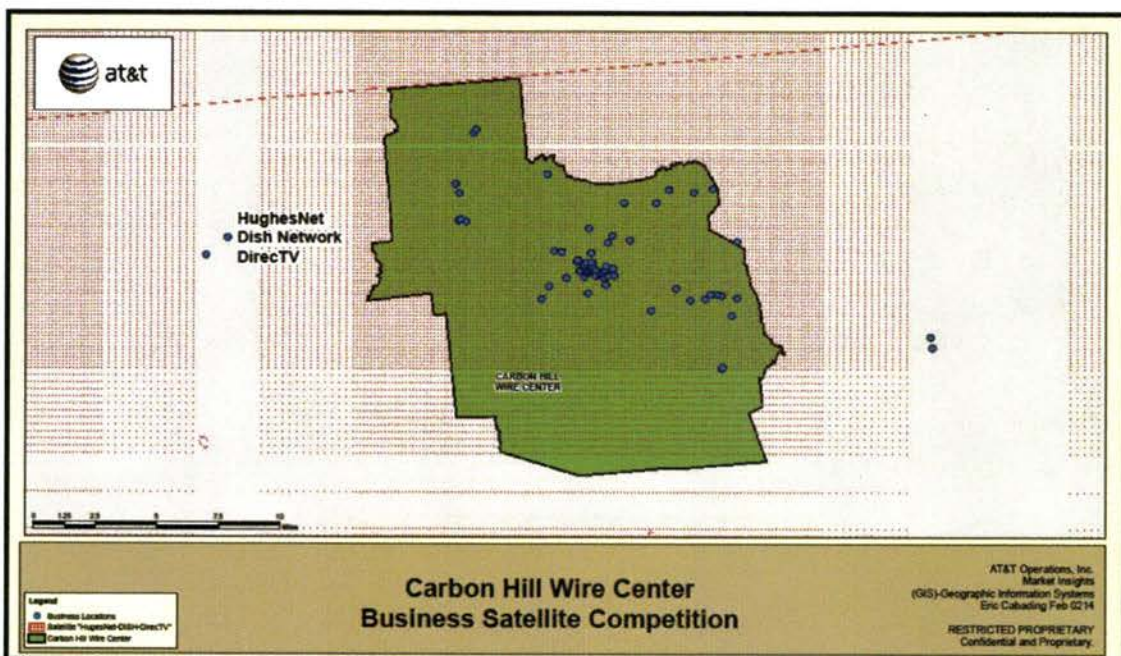
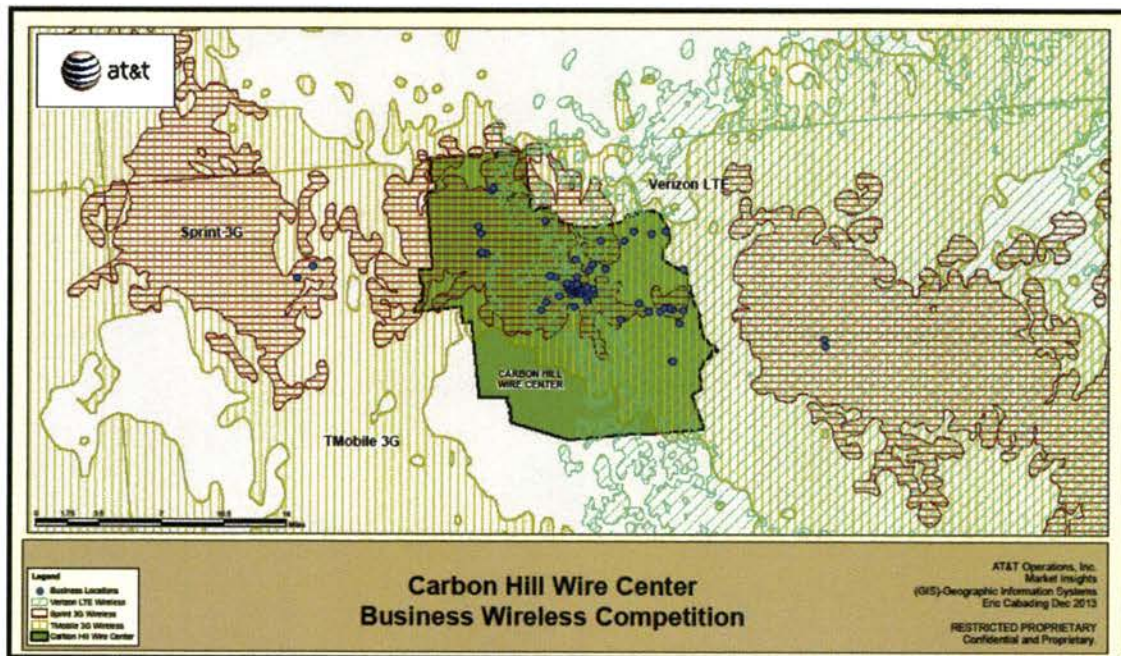
# Exhibit C



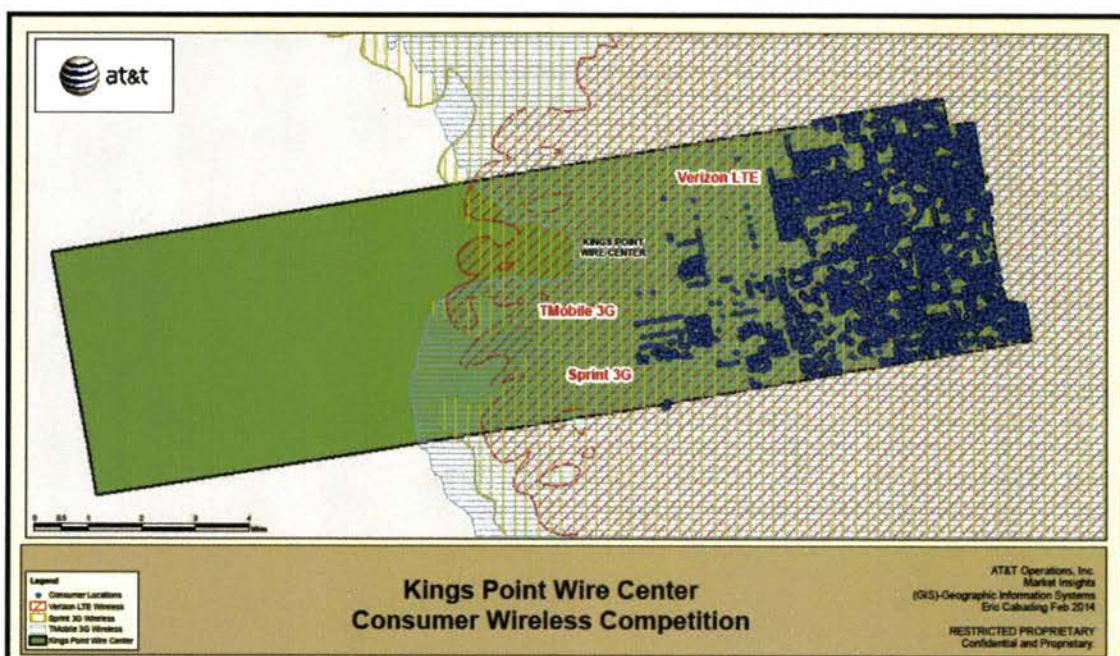
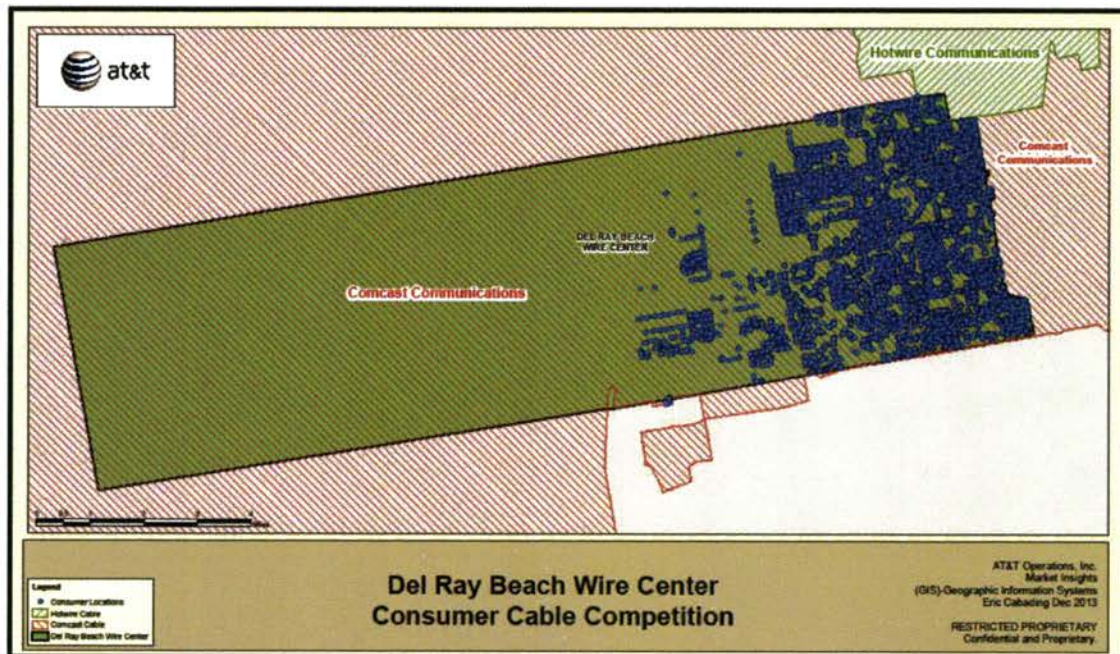




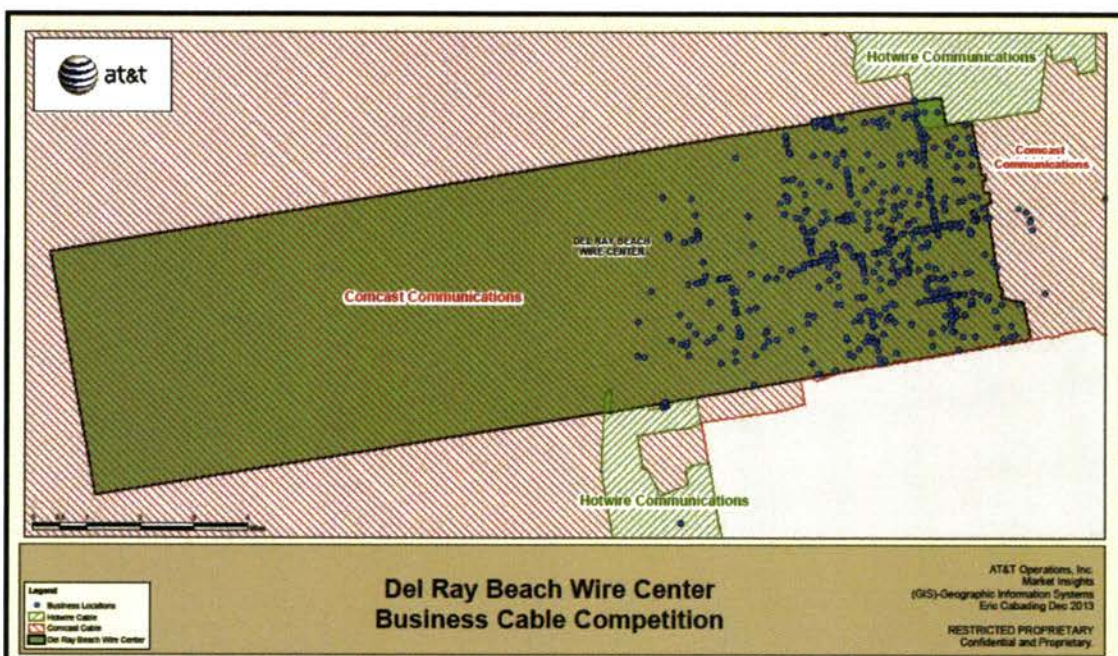
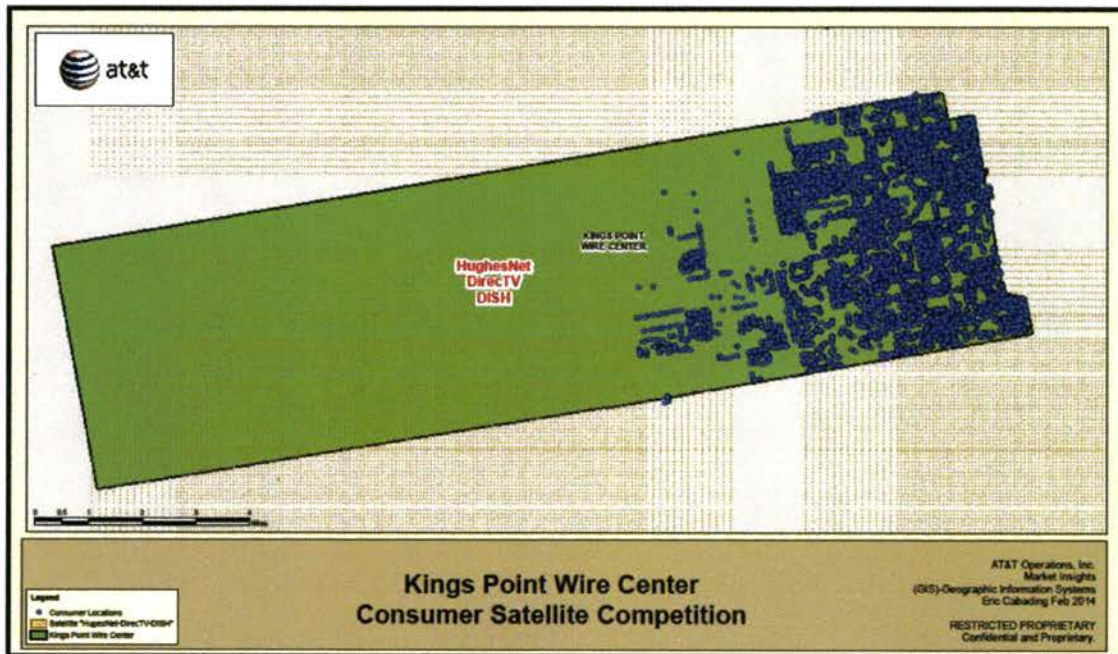




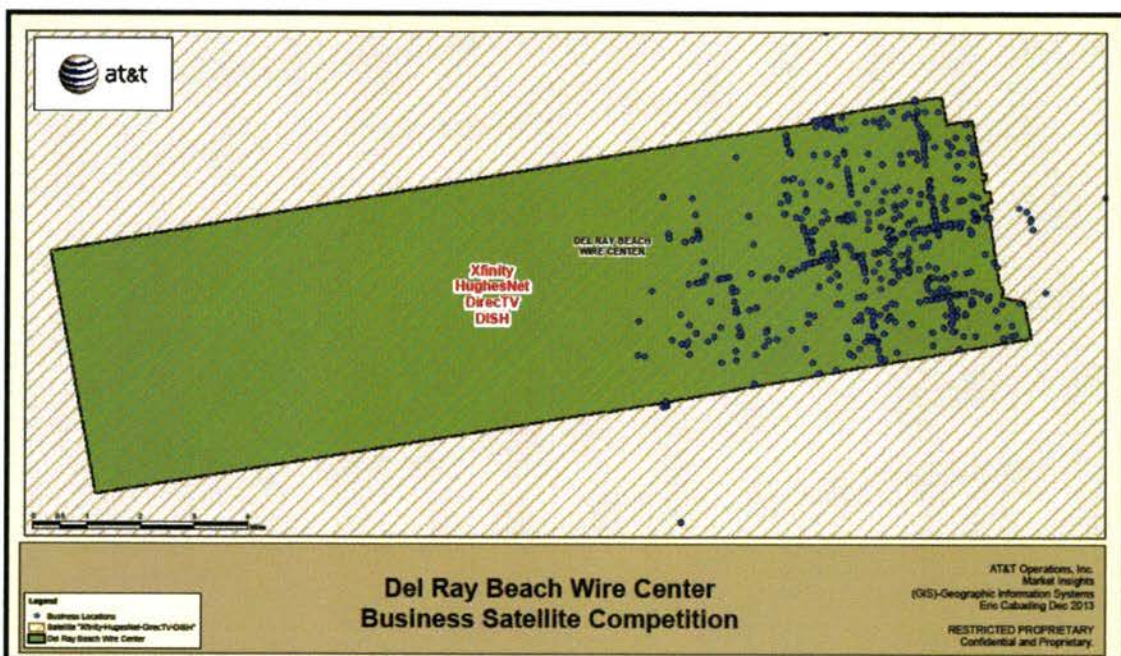
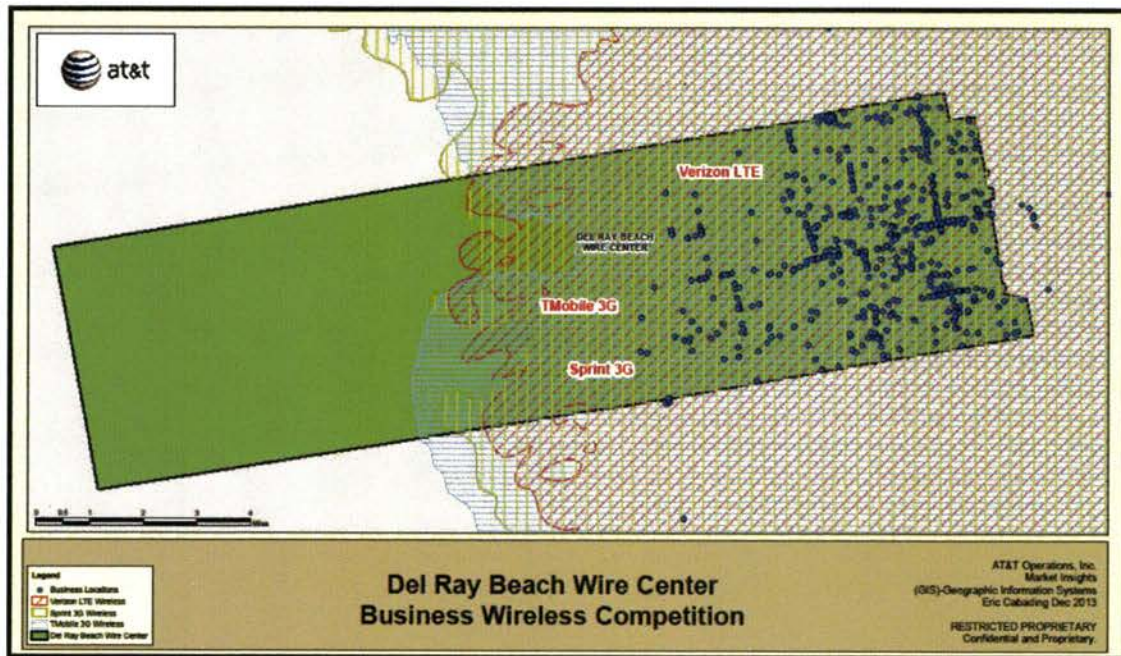












# Exhibit D

**REDACTED  
FOR PUBLIC  
INSPECTION**



## AT&amp;T's Proposed Service Transition Timeline

## Consumer Timeline

| BellSouth Consumer TDM-based Services | Grandfather Customer Notice & Phase I 214 Filing for Interstate Services | Proposed Effective Date to Grandfather | Sunset Customer Notice & Phase II 214 Filing for Interstate Services | Proposed Effective Date to Sunset | Sunset Complete (0 customers) |
|---------------------------------------|--|--|--|-----------------------------------|-------------------------------|
| <b>TDM-Voice Svcs:</b>                |  |  |  |                                   |                               |
| Flat Line Svc                         |  |  |  |                                   |                               |
| Measured Rate                         |  |  |  |                                   |                               |
| Voice Packages                        |  |  |  |                                   |                               |
| Local Intralata toll                  |  |  |  |                                   |                               |
| EUCL                                  |  |  |  |                                   |                               |
| <b>Long Distance Plans:</b>           |  |  |  |                                   |                               |
| Domestic Unlimited Plan               |  |  |  |                                   |                               |
| Domestic Block of time                |  |  |  |                                   |                               |
| Int'l Per Minute                      |  |  |  |                                   |                               |
| Int'l Voice Plans                     |  |  |  |                                   |                               |
| <b>Consumer Internet Access:</b>      |  |  |  |                                   |                               |
| DSL Direct                            |  |  |  |                                   |                               |
| DSL Lineshare                         |  |  |  |                                   |                               |

See the Product Data sheets for the details associated with each product category

## Business Timeline

| BellSouthBusiness TDM-based Services   | Grandfather Customer Notice & Phase I 214 Filing for Interstate Services | Proposed Effective Date to Grandfather | Sunset Customer Notice & Phase II 214 Filing for Interstate Services | Proposed Effective Date to Sunset | Sunset Complete (0 customers) |
|--|--|--|--|-----------------------------------|-------------------------------|
|  |  |  |  |                                   |                               |
| Flat Line; Measured Line               |  |  |  |                                   |                               |
| Flat Trunks; PBX Trunks                |  |  |  |                                   |                               |
| ISDN BRI/PRI                           |  |  |  |                                   |                               |
| Centrex                                |  |  |  |                                   |                               |
| Business DSL                           |  |  |  |                                   |                               |
| Analog PL - Voice Grade Services (DS0) |  |  |  |                                   |                               |
| DS-1 Services                          |  |  |  |                                   |                               |
| DS-3 Services                          |  |  |  |                                   |                               |
| Switched Access: FG-A, FG-B, FG-D      |  |  |  |                                   |                               |
| SMART Ring                             | Grandfathering Beyond 2016   |  |  |                                   |                               |

See the Product Data Sheets for the details associated with each product category

# Exhibit E

**REDACTED  
FOR PUBLIC  
INSPECTION**



# **Carbon Hill, Consumer Market Product Data Sheets**

## **PUBLIC VERSION**

**Carbon Hill Consumer: Flat Rate Main Station Line Service, Individual Line, Residence (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH1                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                           |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchange GB: A3.2.1<br>USOC 1FR, 1FRCL |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | Flat Rate Main Station Line Service, individual line, Residence |
|----------------------------|---|

**Service Description**

A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g003.pdf">http://cpr.web.att.com/pdf/al/g003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail. |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 88.00 %         |
| WEST ALABAMA TV CABLE  | Cable C DOWN : UNKNOWN - C UP : UNKNOWN | 2.23 %          |
| HUGHESNET              | SATELLITE                               | 90.23 %         |
| DISH NETWORK           | SATELLITE                               | 90.23 %         |
| DIRECTV                | SATELLITE                               | 90.23 %         |
| Sprint                 | WIRELESS 3G                             | 54.23 %         |
| Verizon Wireless       | WIRELESS LTE                            | 46.23 %         |
| T-Mobile USA           | WIRELESS 3G                             | 82.67 %         |



**Carbon Hill Consumer: Area Plus Service, Individual line service, Residence (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH2                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg GB A3.2.11 USOC AC1, AC1CL, VR5, VR5CL, VR5, VR6CL, ACML2, ACML3 |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | Area Plus Service, Individual line service, Residence |
|----------------------------|---|

**Service Description**

Area Plus service provides residence subscribers a flat rate access line with unlimited calling to all access lines within the serving exchange, the additional exchanges in the associated Extended Area Service (EAS) and Extended Calling.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | 06/01/2016<br><a href="http://cpr.web.att.com/pdf/al/g003.pdf">http://cpr.web.att.com/pdf/al/g003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB; Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 62.50 %         |
| Verizon Wireless       | WIRELESS LTE                            | 87.50 %         |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Consumer: Area Calling Service, Access Line, Residence (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH3                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                      |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | AL Gen Exch. GB A103.2.9<br>USOC: ACP, ACPCL, ASR, ASRCL |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | Area Calling Service, Access Line, Residence |

| Service Description   |
|---|
| A classification of exchange service which includes an individual line and a usage package. In addition, usage charges apply for outward completed local calling and are based on number of calls, duration, time of day/day. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g103.pdf">http://cpr.web.att.com/pdf/al/g103.pdf</a> |

| Next Generation Product Offer  |   |
|--|---|
| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB; Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count   |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

| Competitive Presence   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 95.00 %         |
| WEST ALABAMA TV CABLE  | Cable C DOWN : UNKNOWN - C UP : UNKNOWN | 5.00 %          |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 65.00 %         |
| Verizon Wireless       | WIRELESS LTE                            | 45.00 %         |
| T-Mobile USA           | WIRELESS 3G                             | 90.00 %         |



**Carbon Hill Consumer: Complete Choice Basic Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH5                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference              |
|-------------------------|--------------------|---------|----------------------------------|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg A3.2.15 USOC: PAMA7 |

**Product Retirement**

|                            |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Complete Choice Basic Service |
|----------------------------|-------------------------------|

**Service Description**

Complete Choice Basic service provides a flat rate access line and unlimited calling to all exchange access lines within the subscriber's local calling area. Subscribers have unlimited use of 2 calling features: Call Waiting ID and Caller ID.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g003.pdf">http://cpr.web.att.com/pdf/al/g003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 98.21 %         |
| WEST ALABAMA TV CABLE  | Cable C DOWN : UNKNOWN - C UP : UNKNOWN | 0.89 %          |
| HUGHESNET              | SATELLITE                               | 99.10 %         |
| DISH NETWORK           | SATELLITE                               | 99.10 %         |
| DIRECTV                | SATELLITE                               | 99.10 %         |
| Sprint                 | WIRELESS 3G                             | 54.46 %         |
| Verizon Wireless       | WIRELESS LTE                            | 69.64 %         |
| T-Mobile USA           | WIRELESS 3G                             | 95.54 %         |



**Carbon Hill Consumer: 2 Pack Plan (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH6                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                       |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchng GB: A103.2.13<br>USOC PAMA6 |

**Product Retirement**

|                            |             |
|----------------------------|-------------|
| Service to be Discontinued | 2 Pack Plan |
|----------------------------|-------------|

**Service Description**

The 2 Pack Plan provides a flat rate access line with Touch-Tone capability and unlimited calling to all exchange access lines within the subscriber's local calling area. The plan also entitles a residence subscriber to unlimited use of 5 features and services. Subscribers have unlimited use of 6 the features/services.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g103.pdf">http://cpr.web.att.com/pdf/al/g103.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 60.00 %         |
| Verizon Wireless       | WIRELESS LTE                            | 40.00 %         |
| T-Mobile USA           | WIRELESS 3G                             | 80.00 %         |



**Carbon Hill Consumer: Long Distance Message Telecommunications Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH7                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                           |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg GB:A18.3.1<br>USOC: PAMA1, PAMA2 |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Long Distance Message Telecommunications Service |
|----------------------------|--|

**Service Description**

(IntraLATA Local Toll) Long Distance Message Telecommunications Service provides facilities for communications between stations in different rate centers for either two-point or conference service. Rates for service between points are based on airline mileage between rate centers. In general, each point is designated as a rate center except that certain small towns or communities are assigned adjacent rate centers with which they are closely associated for communication purposes or by community of interest.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g018.pdf">http://cpr.web.att.com/pdf/al/g018.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No Records Found. |            |                 |



**Carbon Hill Consumer: PreferredPack Plan (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH8                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                       |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg GB: A103.2.12<br>USOC: PAMA5 |

**Product Retirement**

|                            |                    |
|----------------------------|--------------------|
| Service to be Discontinued | PreferredPack Plan |
|----------------------------|--------------------|

**Service Description**

The Preferred Pack plan provides a flat rate access line with Touch-Tone capability and entitles a residence subscriber to unlimited calling to all exchange access lines within the subscriber's local calling area 3. The plan also entitles a residence subscriber to unlimited use of 9 features/services.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g103.pdf">http://cpr.web.att.com/pdf/al/g103.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 33.33 %         |
| Verizon Wireless       | WIRELESS LTE                            | 33.33 %         |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Consumer: Custom Rate Plan (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH9                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                    |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg GB: A20.3.9<br>USOC OSR20 |

**Product Retirement**

|                            |                  |
|----------------------------|------------------|
| Service to be Discontinued | Custom Rate Plan |
|----------------------------|------------------|

**Service Description**

Custom Rate Plan is an Optional Calling Plan offered to residential customers and is applicable to intrastate intraLATA long distance calls originated and terminated in the customer's home state. Eligible calls include those dialed on a Station-to-Station basis (as either Dial, Dial Calling Card, or Operator) or on a Person-to-Person basis.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g020.pdf">http://cpr.web.att.com/pdf/al/g020.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed<br>Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Verizon Wireless       | WIRELESS LTE                            | 100.00 %        |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Consumer: Easy Calling Plans, Plan No.1 (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH10                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                 |
|-------------------------|--------------------|---------|-------------------------------------|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg, GB: A20.4, USOC OC910 |

**Product Retirement**

|                            |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Easy Calling Plans, Plan No.1 |
|----------------------------|-------------------------------|

**Service Description**

An optional intrastate intraLATA toll calling plan that allows all direct dialed sent paid (non-operator assisted) intrastate calls that originate and terminate in the customer's home Calling Zone/LATA to be rated at \$.10 per minute.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/q020.pdf">http://cpr.web.att.com/pdf/al/q020.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 33.34 %         |
| Verizon Wireless       | WIRELESS LTE                            | 83.34 %         |
| T-Mobile USA           | WIRELESS 3G                             | 83.34 %         |



**Carbon Hill Consumer: Integrated Services Digital Network (ISDN),Residence Srvc (IRS) (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | CH11                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                         |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchng GB A42.2<br>USOC: LQAFX,LQGFX |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | Integrated Services Digital Network (ISDN), Residence Service (IRS) |
|----------------------------|---|

**Service Description**

Residence Service (IRS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IRS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IRS is provided through Basic Rate Access. Features are available to increase the capability of the Bearer Alternative Service and may be subscribed to on an as-needed basis. B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g042.pdf">http://cpr.web.att.com/pdf/fl/g042.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No Records Found. |            |                 |



**Carbon Hill Consumer: Complete Choice Service (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH12                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                      |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchange GB A103.2.10 USOC Vr3, VSB, CCML2, CCML3 |

**Product Retirement**

|                            |                         |
|----------------------------|-------------------------|
| Service to be Discontinued | Complete Choice Service |
|----------------------------|-------------------------|

**Service Description**

Complete Choice service provides a flat rate access line with Touch-Tone capability and unlimited calling to all exchange access lines in the subscriber's local calling area. It also entitles a residence subscriber to unlimited use of 32 services/features. Residence customers may subscribe to the Two-Line Plan or the Three-Line Plan for Complete Choice service. All lines in each multi-line package must be billed to the same account and located at the same premises.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/q103.pdf">http://cpr.web.att.com/pdf/al/q103.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET              | SATELLITE                               | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV                | SATELLITE                               | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 66.67 %         |
| Verizon Wireless       | WIRELESS LTE                            | 69.05 %         |
| T-Mobile USA           | WIRELESS 3G                             | 97.62 %         |



**Carbon Hill Consumer: Foreign Exchange Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH13                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                      |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | <b>AL Gen Exchg GB A9.1.3</b><br><b>USOC 1LH++,FRT++</b> |

**Product Retirement**

|                            |                          |
|----------------------------|--------------------------|
| Service to be Discontinued | Foreign Exchange Service |
|----------------------------|--------------------------|

**Service Description**

A classification of exchange service furnished to a subscriber from an exchange other than the one from which they would normally be served

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g009.pdf">http://cpr.web.att.com/pdf/al/g009.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
| n/a           | n/a                       |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No Records Found. |            |                 |

**Carbon Hill Consumer: Foreign Central Office Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH 14                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                           |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | <b>AL Gen Exchg GB: A9.2.2<br/>USOC 1LX++</b> |

| Product Retirement         |                                |
|----------------------------|--------------------------------|
| Service to be Discontinued | Foreign Central Office Service |

| Service Description   |
|---|
| Foreign Central Office Service is exchange service furnished to a subscriber in a multi-office exchange from a central office |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Moves, Add, Changes |
|--------------------------------------|-------------|------------------------------|
|                                      |             |                              |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g009.pdf">http://cpr.web.att.com/pdf/al/g009.pdf</a> |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION |
|                               |                           |

| Demand Count   |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

| Competitive Presence |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No Records Found.    |            |                 |



**Carbon Hill Consumer: DSL Direct**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | CH15                 |

| Regulatory Jurisdiction | Type of Regulation | FRN | Tariff Reference (Tariff |
|-------------------------|--------------------|-----|--------------------------|
| n/a                     | n/a                | n/a | N/A                      |

**Product Retirement**

DSL Direct (Elite, Pro, Express and Basic)

**Service Description**

DSL **WITHOUT** home phone service: DSL Direct Elite up to 6.0 Mbps downstream and up to 768 Kbps Upstream; DSL Direct Pro up to 3.0 Mbps Downstream and up to 512 Kbps Upstream; DSL Direct Basic up to 768 Kbps Downstream and up to 384 Kbps Upstream.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT NAME   | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-Verse HSIA.<br>Speed Range: 3MB to 100MB<br>Rate Price Range: \$41.00 to \$110.00 | High Speed Internet providing streaming video, large downloads, gaming with speeds available up to 24Mbps and access to national AT&T Wi-Fi Hot Spot network included. Requires the purchase of IP Broadband |

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                                | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100%            |
| HUGHESNET              | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 90.00 %         |
| DISH NETWORK           | SATELLITE                                 | 75.00 %         |
| DIRECTV                | SATELLITE                                 | 100%            |
| SPRINT                 | SATELLITE                                 | 100%            |
| VERIZON WIRELESS       | SATELLITE                                 | 100%            |
| T-Mobile USA           | WIRELESS LTE                              | 100%            |

**Carbon Hill Consumer: DSL Line Share**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | CH16                 |

| Regulatory Jurisdiction | Type of Regulation | FRN | Tariff Reference (Tariff |
|-------------------------|--------------------|-----|--------------------------|
| n/a                     | n/a                | n/a | N/A                      |

**Product Retirement**

DSL Line Share

**Service Description**

DSL **WITH** home phone service: DSL Direct Elite up to 6.0 Mbps downstream and up to 768 Kbps Upstream; DSL Direct Pro up to 3.0 Mbps Downstream and up to 512 Kbps Upstream; DSL Direct Basic up to 768 Kbps Downstream and up to 384 Kbps Upstream.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT NAME  | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&TU-Verse HSIA.<br>Speed Range: 3MB to 100MB Rack Rate Price Range: \$41.00 to \$110.00 | High Speed Internet providing streaming video, large downloads, gaming with speeds available up to 24Mbps and access to national AT&T Wi-Fi Hot Spot network included. Requires the purchase of IP Broadband. |

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                                | Percent Covered |
|------------------------|---|-----------------|
| CHARTER COMMUNICATIONS | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100%            |
| HUGHESNET              | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 90.00 %         |
| DISH NETWORK           | SATELLITE                                 | 75.00 %         |
| DIRECTV                | SATELLITE                                 | 100%            |
| SPRINT                 | SATELLITE                                 | 100%            |
| VERIZON WIRELESS       | SATELLITE                                 | 100%            |
| T-Mobile USA           | WIRELESS LTE                              | 100%            |



**Carbon Hill Consumer: End User Access Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH17                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference   |
|-------------------------|--------------------|---------|--|
| Interstate              | Dominant           | 1857952 | FCC Tariff #1 Access Services. <b>USOC(s)</b> : 9LM 9ZR, |

| Product Retirement      |
|-------------------------|
| End User Access Service |

| Service Description   |
|---|
| End User Access service provides for the use of an End User Common Line by an end user. AT&T provides End User Access service to end users who obtain local exchange service from its general interstate or local exchange tariffs. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Tariff Link   |
|--|------------------------|---|
|  |                        | <a href="http://cpr.att.com/pdf/fcc/1004.pdf">http://cpr.att.com/pdf/fcc/1004.pdf</a> |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION |
| N/A                           |                           |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

**Carbon Hill Consumer: Complete Choice Enhanced (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CH18                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference             |
|-------------------------|--------------------|---------|---------------------------------|
| Intrastate              | Dominant           | 1857952 | AL Gen Exchg A3.2.1 USOC: PAMA8 |

| Product Retirement         |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Complete Choice Basic Service |

| Service Description   |
|---|
| Complete Choice Enhanced service provides a flat rate access line and unlimited calling to all exchange access lines within the subscriber's local calling area. Subscribers may select an unlimited number of the following compatible services or features: Custom Calling, TouchStar, RingMaster, Message Waiting Indicator. *some exclusions may apply. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g003.pdf">http://cpr.web.att.com/pdf/al/g003.pdf</a> |

| Next Generation Product Offer  |   |
|--|---|
| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB<br>Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count        |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

| Competitive Presence |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No Records Found.    |            |                 |



# **King's Point, Consumer Market Product Data Sheets**

## **PUBLIC VERSION**

**King's Point Consumer: Flat Rate Service, Residence Service, Individual Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP1                  |

| Regulatory Jurisdiction | Type of Regulation |         | Guidebook Reference                      |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A3.4.2 USOC: 1FR, 1FRCL |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Flat Rate Service, Residence Service, Individual Service |
|----------------------------|--|

**Service Description**

A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR             | TECHNOLOGY                                | Percent Covered |
|------------------------|---|-----------------|
| COMCAST CORPORATION    | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 98.63 %         |
| HOTWIRE COMMUNICATIONS | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 0.02 %          |
| HUGHESNET              | SATELLITE                                 | 98.64 %         |
| DIRECTV                | SATELLITE                                 | 98.64 %         |
| DISH NETWORK           | SATELLITE                                 | 98.64 %         |
| Verizon Wireless       | WIRELESS LTE                              | 98.64 %         |
| SPRINT                 | WIRELESS 3G                               | 98.64 %         |
| T-MOBILE               | WIRELESS 3G                               | 98.64 %         |



**King's Point Consumer: Flat Rate Service, Area Plus Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP2                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A3.4.4, A103.4.3 USOC: VR5, VR5CL, VR6, VR6CL, ACML2, ACML3 |

| Product Retirement         |                                      |
|----------------------------|--------------------------------------|
| Service to be Discontinued | Flat Rate Service, Area Plus Service |

| Service Description   |
|---|
| Area Plus service provides residence subscribers a flat rate access line with unlimited calling to all access lines within the serving exchange, the additional exchanges in the associated Extended Area Service(EAS)and Extended Calling. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count        |   |
|---------------------|---|
| Number of Customers | Number of customers Without An AT&T Catch Product |

|                              |  |
|------------------------------|--|
| Number of Customer Locations | Number of Customers with a Competitive Catch Product in their Service Area |
|------------------------------|--|

|                    |   |
|--------------------|---|
| Number of Services | Number of Customers Without AT&T or Competitive Catch Product |
|--------------------|---|

|  |  |
|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area | Under Assessment, may have AT&T or Competitive Catch Product |
|--|--|

| Competitive Presence |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET            | SATELLITE                                 | 100.00 %        |
| DIRECTV              | SATELLITE                                 | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| SPRINT               | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE             | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: Complete Choice Basic Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP3                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference               |
|-------------------------|--------------------|---------|-----------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A3.49 USOC PAMA7 |

| Product Retirement         |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Complete Choice Basic Service |

| Service Description   |
|---|
| Complete Choice Basic service provides a flat rate access line and unlimited calling to all exchange access lines within the subscribers local calling area. Subscribers have unlimited use of 2 calling features: Call Waiting ID and Caller ID. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB; Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count        |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

| Competitive Presence   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION    | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 96.67 %         |
| HOTWIRE COMMUNICATIONS | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 0.10 %          |
| HUGHESNET              | SATELLITE                                 | 96.77 %         |
| DIRECTV                | SATELLITE                                 | 96.77 %         |
| DISH NETWORK           | SATELLITE                                 | 96.77 %         |
| Verizon Wireless       | WIRELESS LTE                              | 96.77 %         |
| SPRINT                 | WIRELESS 3G                               | 96.77 %         |
| T-MOBILE               | WIRELESS 3G                               | 96.77 %         |



## King's Point Consumer: Easy Calling Plans, Plan No.1 (Active)

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP4                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                 |
|-------------------------|--------------------|---------|-------------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A18.18 USOC: OC910 |

**Product Retirement**

|                            |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Easy Calling Plans, Plan No.1 |
|----------------------------|-------------------------------|

**Service Description**

An optional intrastate intraLATA toll calling plan that allows all direct dialed sent paid (non-operator assisted) intrastate calls that originate and terminate in the customer's home Calling Zone/LATA to be rated at \$.10 per minute.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g018.pdf">http://cpr.web.att.com/pdf/fl/g018.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB<br>Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET           | SATELLITE                                 | 100.00 %        |
| DIRECTV             | SATELLITE                                 | 100.00 %        |
| DISH NETWORK        | SATELLITE                                 | 100.00 %        |
| Verizon Wireless    | WIRELESS LTE                              | 100.00 %        |
| SPRINT              | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE            | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: Long Distance Message Telecommunications Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP5                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                       |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | FL Gen. Excg GB: A18.3 USOC: PAMA1, PAMA2 |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | Long Distance Message Telecommunications Service |

| Service Description  |
|--|
| Long Distance Message Telecommunications Service is that of furnishing facilities for communications between stations in different rate centers for either two-point or conference service. Rates for service between points are based on airline mileage between rate centers. In general, each point is designated as a rate center except that certain small towns or communities are assigned adjacent rate centers with which they are closely associated for communication purposes or by community of interest. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g018.pdf">http://cpr.web.att.com/pdf/fl/g018.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count        |   |
|---------------------|---|
| Number of Customers | Number of customers Without An AT&T Catch Product |

|                              |  |
|------------------------------|--|
| Number of Customer Locations | Number of Customers with a Competitive Catch Product in their Service Area |
|------------------------------|--|

|                    |   |
|--------------------|---|
| Number of Services | Number of Customers Without AT&T or Competitive Catch Product |
|--------------------|---|

|  |  |
|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area | Under Assessment, may have AT&T or Competitive Catch Product |
|--|--|

| Competitive Presence |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET            | SATELLITE                                 | 100.00 %        |
| DIRECTV              | SATELLITE                                 | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| SPRINT               | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE             | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: 2 Pack Plan (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP6                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference #                 |
|-------------------------|--------------------|---------|---------------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A103.4.7 USOC: PAMA6 |

| Product Retirement         |             |
|----------------------------|-------------|
| Service to be Discontinued | 2 Pack Plan |

| Service Description   |
|---|
| The 2 Pack Plan provides a flat rate access line with Touch-Tone capability and unlimited calling to all exchange access lines within the subscribers local calling area. The plan also entitles a residence subscriber to unlimited use of 5 features and services. Subscribers have unlimited use of 6 the features/services. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g103.pdf">http://cpr.web.att.com/pdf/fl/g103.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB; Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count        |   |
|---------------------|---|
| Number of Customers | Number of customers Without An AT&T Catch Product |

|                              |  |
|------------------------------|--|
| Number of Customer Locations | Number of Customers with a Competitive Catch Product in their Service Area |
|------------------------------|--|

|                    |   |
|--------------------|---|
| Number of Services | Number of Customers Without AT&T or Competitive Catch Product |
|--------------------|---|

|  |  |
|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area | Under Assessment, may have AT&T or Competitive Catch Product |
|--|--|

| Competitive Presence |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET            | SATELLITE                                 | 100.00 %        |
| DIRECTV              | SATELLITE                                 | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| SPRINT               | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE             | WIRELESS 3G                               | 100.00 %        |



## King's Point Consumer: PreferredPack Plan (Grandfathered)

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Project Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP7                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Ref                         |
|-------------------------|--------------------|---------|---------------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A103.4.6 USOC: PAMA5 |

| Product Retirement         |                    |
|----------------------------|--------------------|
| Service to be Discontinued | PreferredPack Plan |

| Service Description  |
|--|
| The Preferred Pack plan provides a flat rate access line with Touch-Tone capability and entitles a residence subscriber to unlimited calling to all exchange access lines within the subscriber's local calling area 3. The plan also entitles a residence subscriber to unlimited use of 9 features/services. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g103.pdf">http://cpr.web.att.com/pdf/fl/g103.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count   |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

| Competitive Presence |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET            | SATELLITE                                 | 100.00 %        |
| DIRECTV              | SATELLITE                                 | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| SPRINT               | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE             | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: Custom Rate Plan (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP8                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference               |
|-------------------------|--------------------|---------|-----------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Excg GB: A18.21 USOC OSR20 |

**Product Retirement**

|                            |                  |
|----------------------------|------------------|
| Service to be Discontinued | Custom Rate Plan |
|----------------------------|------------------|

**Service Description**

Custom Rate Plan is an Optional Calling Plan offered to residential customers and is applicable to intrastate intraLATA long distance calls originated and terminated in the customer's home state. Eligible calls include those dialed on a Station-to-Station basis (as either Dial, Dial Calling Card, or Operator) or on a Person-to-Person basis.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g018.pdf">http://cpr.web.att.com/pdf/fl/g018.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 97.62 %         |
| HUGHESNET           | SATELLITE                                 | 97.62 %         |
| DIRECTV             | SATELLITE                                 | 97.62 %         |
| DISH NETWORK        | SATELLITE                                 | 97.62 %         |
| Verizon Wireless    | WIRELESS LTE                              | 97.62 %         |
| SPRINT              | WIRELESS 3G                               | 97.62 %         |
| T-MOBILE            | WIRELESS 3G                               | 97.62 %         |



**King's Point Consumer: Integrated Services Digital Network(ISDN),ResidenceService(IRS)**  
(Active)

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | KP9                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                       |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A42.2 USOC: LQAFX, LQGFX |

**Product Retirement**

|                                   |   |
|-----------------------------------|---|
| <b>Service to be Discontinued</b> | Integrated Services Digital Network (ISDN), Residence Service (IRS) |
|-----------------------------------|---|

**Service Description**

Residence Service (IRS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IRS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IRS is provided through Basic Rate Access. B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g042.pdf">http://cpr.web.att.com/pdf/fl/g042.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to international countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|  |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

**Competitive Presence**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET           | SATELLITE                                 | 100.00 %        |
| DIRECTV             | SATELLITE                                 | 100.00 %        |
| DISH NETWORK        | SATELLITE                                 | 100.00 %        |
| Verizon Wireless    | WIRELESS LTE                              | 100.00 %        |
| SPRINT              | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE            | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: Complete Choice Service (Grandfathered)**

| Wire Center | Legal Name of Service Provider       | d/b/a Name of Service Provider                      | Product Data Sheet # |
|-------------|--------------------------------------|---|----------------------|
| DLBHFLKP    | BellSouth<br>Telecommunications, LLC | AT&T Florida (BellSouth<br>Telecommunications, LLC) | KP10                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                      |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | FL Gen. Exng GB: A103.4.3 USOC<br>VR3, VSB, CCML2, CCML3 |

| Product Retirement         |                         |
|----------------------------|-------------------------|
| Service to be Discontinued | Complete Choice Service |

| Service Description   |
|---|
| Complete Choice service provides a flat rate access line with Touch-Tone capability and unlimited calling to all exchange access lines in the subscriber's local calling area. It also entitles a residence subscriber to unlimited use of 32 services/features. Residence customers may subscribe to the Two-Line Plan or the Three-Line Plan for Complete Choice service. All lines in each multi-line package must be billed to the same account and located at the same premises. Complete Choice is also available with Area Plus Service. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/q103.pdf">http://cpr.web.att.com/pdf/fl/q103.pdf</a> |

| Next Generation Product Offer   |   |
|---|---|
| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
| AT&T U-Verse Voice 200 BOT with Internet<br>Speed Range: 3MB- 100MB Rack Rate<br>Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| AT&T U-Verse Voice Unlimited with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-verse International with Internet<br>Speed Range: 3MB to 100MB Rack Rate<br>Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

| Demand Count   |  |  |  |
|--|--|--|--|
| Number of Customers  |  | Number of customers Without An AT&T Catch Product                          |  |
| Number of Customer Locations   |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
| Number of Services   |  | Number of Customers Without AT&T or Competitive Catch Product              |  |
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product               |  |

| Competitive Presence |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET            | SATELLITE                                 | 100.00 %        |
| DIRECTV              | SATELLITE                                 | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| SPRINT               | WIRELESS 3G                               | 100.00 %        |
| T-MOBILE             | WIRELESS 3G                               | 100.00 %        |



**King's Point Consumer: Foreign Exchange Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP11                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                       |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A9.1.6<br>USOC: 1D9++, 1L9++, BME, FX5++ |

**Product Retirement**

|                            |                          |
|----------------------------|--------------------------|
| Service to be Discontinued | Foreign Exchange Service |
|----------------------------|--------------------------|

**Service Description**

A classification of exchange service furnished to a subscriber from an exchange other than the one from which they would normally be served

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g009.pdf">http://cpr.web.att.com/pdf/fl/g009.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
| n/a           | n/a                       |

**Demand Count**

|  |   |  |   |
|--|---|--|---|
| Number of Customers  | ■ | Number of customers Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations   | ■ | Number of Customers with a Competitive Catch Product in their Service Area | ■ |
| Number of Services   | ■ | Number of Customers Without AT&T or Competitive Catch Product              | ■ |
| Number of Customers with an AT&T Catch Product Available in their Service Area | ■ | Under Assessment, may have AT&T or Competitive Catch Product               | ■ |

**Competitive Presence**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**King's Point Consumer: Foreign Central Office Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP11                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                  |
|-------------------------|--------------------|---------|--------------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg GB: A9.2<br>USOC: 1LHGV |

**Product Retirement**

|                            |                          |
|----------------------------|--------------------------|
| Service to be Discontinued | Foreign Exchange Service |
|----------------------------|--------------------------|

**Service Description**

Foreign Central Office Service is exchange service furnished to a subscriber in a multi-office exchange from a central office

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g009.pdf">http://cpr.web.att.com/pdf/fl/g009.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
| n/a           | n/a                       |

**Demand Count**

|  |   |  |   |
|--|---|--|---|
| Number of Customers  | ■ | Number of customers Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations   | ■ | Number of Customers with a Competitive Catch Product in their Service Area | ■ |
| Number of Services   | ■ | Number of Customers Without AT&T or Competitive Catch Product              | ■ |
| Number of Customers with an AT&T Catch Product Available in their Service Area | ■ | Under Assessment, may have AT&T or Competitive Catch Product               | ■ |

**Competitive Presence**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |

**King's Point Consumer: DSL Direct**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP13                 |

| Regulatory Jurisdiction | Type of Regulation | FRN | Tariff Reference (Tariff) |
|-------------------------|--------------------|-----|---------------------------|
| n/a                     | n/a                | n/a | N/A                       |

**Product Retirement**

DSL Direct (Elite, Pro, Express and Basic)

**Service Description**

DSL **WITHOUT** home phone service: DSL Direct Elite up to 6.0 Mbps downstream and up to 768 Kbps Upstream; DSL Direct Pro up to 3.0 Mbps Downstream and up to 512 Kbps Upstream; DSL Direct Basic up to 768 Kbps Downstream and up to 384 Kbps Upstream.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT NAME  | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-Verse HSIA.<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$41.00 to \$111.00 | High Speed Internet providing streaming video, large downloads, gaming with speeds available up to 24Mbps and access to national AT&T Wi-Fi Hot Spot network included. Requires the purchase of IP Broadband |

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Presence**

| COMPETITOR       | TECHNOLOGY                                | Percent Covered |
|------------------|---|-----------------|
| COMCAST          | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 99%             |
| HUGHESNET        | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 96.00 %         |
| DISH NETWORK     | SATELLITE                                 | 96.00 %         |
| DIRECTV          | SATELLITE                                 | 96.00 %         |
| SPRINT           | 3G  | 96.00 %         |
| VERIZON WIRELESS | LTE                                       | 96.00 %         |
| T-MOBILE USA     | 3G  | 96.00 %         |



**King's Point Consumer: DSL Line Share**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP14                 |

| Regulatory Jurisdiction | Type of Regulation | FRN | Tariff Reference (Tariff |
|-------------------------|--------------------|-----|--------------------------|
| n/a                     | n/a                | n/a | N/A                      |

**Product Retirement**

DSL Line Share

**Service Description**

DSL **WITH** home phone service: DSL Direct Elite up to 6.0 Mbps downstream and up to 768 Kbps Upstream; DSL Direct Pro up to 3.0 Mbps Downstream and up to 512 Kbps Upstream; DSL Direct Basic up to 768 Kbps Downstream and up to 384 Kbps Upstream.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT NAME  | CATCH PRODUCT DESCRIPTION  |
|---|--|
| AT&T U-Verse HSIA.<br>Speed Range: 3MB to 100MB; Rack Rate Price Range: \$41.00 to \$111.00 | High Speed Internet providing streaming video, large downloads, gaming with speeds available up to 24Mbps and access to national AT&T Wi-Fi Hot Spot network included. Requires the purchase of IP Broadband |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Presence**

| COMPETITOR       | TECHNOLOGY                                | Percent Covered |
|------------------|---|-----------------|
| COMCAST          | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 99.00%          |
| HUGHESNET        | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 99.00%          |
| DISH NETWORK     | SATELLITE                                 | 99.00%          |
| DIRECTV          | SATELLITE                                 | 99.00%          |
| SPRINT           | 3G  | 99.00%          |
| VERIZON WIRELESS | LTE                                       | 99.00%          |
| T-MOBILE USA     | 3G  | 99.00%          |

**King's Point Consumer: End User Access Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KP15                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference   |
|-------------------------|--------------------|---------|--|
| Interstate              | Dominant           | 1857952 | FCC Tariff #1 Access Services. <b>USOC(s)</b> : 9LM 9ZR, |

| Product Retirement      |
|-------------------------|
| End User Access Service |

| Service Description   |
|---|
| End User Access service provides for the use of an End User Common Line by an end user. AT&T provides End User Access service to end users who obtain local exchange service from its general interstate or local exchange tariffs. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Tariff Link   |
|--|------------------------|---|
|  |                        | <a href="http://cpr.att.com/pdf/fcc/1004.pdf">http://cpr.att.com/pdf/fcc/1004.pdf</a> |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION |
| N/A                           |                           |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |



## King's Point Consumer: Complete Choice Enhanced (Active)

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | KP16                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference             |
|-------------------------|--------------------|---------|---------------------------------|
| Intrastate              | Dominant           | 1857952 | FL Gen Exchg A3.4.8 USOC: PAMA8 |

**Product Retirement**

|                            |                               |
|----------------------------|-------------------------------|
| Service to be Discontinued | Complete Choice Basic Service |
|----------------------------|-------------------------------|

**Service Description**

Complete Choice Enhanced service provides a flat rate access line and unlimited calling to all exchange access lines within the subscriber's local calling area. Subscribers may select an unlimited number of the following compatible services or features: Custom Calling, TouchStar, RingMaster, Message Waiting Indicator. \*some exclusions may apply.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice 200 BOT with Internet Speed Range: 3MB- 100MB<br>Rack Rate Price Range: \$41.00 to \$111.00 | AT&T U-verse Voice 200 BOT includes 200 minutes per month with over 20 advanced voice features. \$.05 per minute after 200 minutes includes Canada. 200 minutes include unlimited local calling and 200 long distance minutes. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T U-Verse Voice Unlimited with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$51.00 to \$121.00 | AT&T U-verse Voice Unlimited includes Unlimited Calls to US and Canada with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION  |
|--|--|
| AT&T U-verse International with Internet Speed Range: 3MB to 100MB<br>Rack Rate Price Range: \$56.00 to \$126.00 | AT&T U-verse Voice International includes Unlimited calls to US and Canada and low rates to International countries with over 20 advanced voice features. Requires the purchase of IP Broadband. |

| CATCH PRODUCT  | CATCH PRODUCT DESCRIPTION   |
|--|---|
| AT&T Wireless Home Phone/ \$19.99 per month/\$9.99 when added with Family Talk | Unlimited Nationwide Calling- Home Phone with Wireless Network with Caller ID, Three Way Calling, Call Forwarding and Voicemail |

**Demand Count**

|                     |  |   |  |
|---------------------|--|---|--|
| Number of Customers |  | Number of customers Without An AT&T Catch Product |  |
|---------------------|--|---|--|

|                              |  |  |  |
|------------------------------|--|--|--|
| Number of Customer Locations |  | Number of Customers with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|--|--|

|                    |  |   |  |
|--------------------|--|---|--|
| Number of Services |  | Number of Customers Without AT&T or Competitive Catch Product |  |
|--------------------|--|---|--|

|  |  |  |  |
|--|--|--|--|
| Number of Customers with an AT&T Catch Product Available in their Service Area |  | Under Assessment, may have AT&T or Competitive Catch Product |  |
|--|--|--|--|

**Competitive Presence**

| COMPETITOR       | TECHNOLOGY | Percent Covered |
|------------------|------------|-----------------|
| No Records Found |            |                 |

# **Carbon Hill, Business Market Product Data Sheets**

## **PUBLIC VERSION**



**Carbon Hill Business: Individual line Measured Rate Service, Business; Area Calling Service, Access Line, Business; Classroom Communication Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB1                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | AL Gen Exchg: A3. 2.9, A3. 7.4, A103.32 USOC: B1M, UPPS2, EEC2A |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | (AL only) Individual line Measured Rate Service, Business; Area Calling Service, Access Line, Business; Classroom Communication Service |

| Service Description   |
|---|
| A classification of exchange service which is charged on the basis of local usage, as determined by the number of calls, the duration of the calls, the distance of the calls and the time of day the calls are placed. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET SATELLITE    |   | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV SATELLITE      |   | 100.00 %        |
| Verizon Wireless       | WIRELESS LTE                            | 60.00 %         |
| Sprint                 | WIRELESS 3G                             | 60.00 %         |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Business: Trunk Line Measured Rate Service, Business; Area Calling Service, Trunk Line, Business (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB2                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                         |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | AL Gen Exchg GB: A3.74 USOC BMU, TKG, UPPS2 |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | (AL only) Trunk Line Measured Rate Service, Business; Area Calling Service, Trunk Line, Business |

| Service Description   |
|---|
| A classification of exchange service which is charged on the basis of local usage, as determined by the number of calls, the duration of the calls, the distance of the calls and the time of day the calls are placed. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features , plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET SATELLITE    |   | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV SATELLITE      |   | 100.00 %        |
| Verizon Wireless       | WIRELESS LTE                            | 33.34 %         |
| Sprint                 | WIRELESS 3G                             | 100.00 %        |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Business: Message Rate Service, Business Trunks, (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Tracking # |
|-------------|-----------------------------------|--|--------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB3               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>AL Gen Exg GB: A3.20, A320.4/5</b><br><b>USOC TMC, TM5, TMU, TM3</b> |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | Message Rate Service, Business Trunks, |

| Service Description  |
|--|
| A classification of exchange service which is charged on the basis of local usage as determined by the number of calls placed. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/q003.pdf">http://cpr.web.att.com/pdf/fl/q003.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**Carbon Hill Business: BellSouth Primary Rate ISDN (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB4                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                             |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | AL Gen Exchg GB: A42 USOC: 1LD1++,1LD2++,PR7++, |

| Product Retirement          |                             |
|-----------------------------|-----------------------------|
| Service to be Discontinued: | BellSouth Primary rate ISDN |

| Service Description   |
|---|
| Integrated Services Digital Network Primary Rate Interface (ISDN PRI) is a voice and data service that provides high-volume access to the public switched telephone network (PSTN). This service lets you transmit data at high speeds to accommodate voice, data, image, and video over the same digital facilities. ISDN PRI provides 23 digital channels over one transport line (a 24th channel carries signaling information). This service offers you one T1 circuit with 23 separate voice lines or a combination of services. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/q042.pdf">http://cpr.web.att.com/pdf/fl/q042.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| IP Flex Reach                 | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**Carbon Hill Business: Self-Healing Multi-Nodal Alternate Route Topology Ring (SmartRing)****Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB5                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                    |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>AL PVL GB: B7.7</b><br><b>USOC:1HV++,SH++,NRCCN</b> |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Self-Healing Multi-Nodal Alternate Route Topology Ring (SmartRing) Service |
|----------------------------|--|

**Service Description**

SMARTRing SONET architecture uses a dual-fiber, self-healing ring with a primary path and a protected path HELPING TO prevent any single point of failure. Service automatically switches to the protected path if the primary path fails. All Rings are available in the standard speeds: Bandwidth/Speeds: OC-3, OC-12, OC-48, OC-192

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link   |
|--|------------------------|--|
|  |                        | TBD<br><a href="http://cpr.web.att.com/pdf/al/h007.pdf">http://cpr.web.att.com/pdf/al/h007.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - E | Ultraviable Express is a DWDM service that will replace the various ILEC and T-Corp SONET Ring products. UVN Express provides the reliable and scalable Ring solution that customers have come to expect from AT&T while providing added value and functionality through enhancements such as eSales and Servicing through Business Direct. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| UVN           | T&Ts Ultraviable® Network Service (UVN) is a fully managed, high-speed, optical transport service that integrates Ethernet, Dense Wavelength Division Multiplexing (DWDM), and Native Wavelength technologies into a single end-to-end network solution. |

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION  |
|------------------------------|--|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EPVL) is offered for connections between two locations while . |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**Carbon Hill Business: SubVoice grade Services - Series 1000 Channels**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Trial Tracking Number |
|-------------|-----------------------------------|--|-----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB6                  |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | AL PVL GB: B3.3, AL Gen Exch GB: A29.2, A29.6 USOC:<br>HB1++,WB1++,HE++,1L++4,O3N5O |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | SubVoice grade Services - Series 1000 Channels |
|----------------------------|--|

**Service Description**

An analog channel for the transmission of asynchronous, or synchronous serial data at rates of up to 19.2, 50.0, or 230.4 Kbps. Optional arrangements are available for transmission of synchronous serial data rates at 18.74, or 40.8 Kbps. BellSouth® Channelized Trunks provides up to twenty-four Direct Inward Dial (DID).

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link   |
|--|------------------------|--|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/h003.pdf">http://cpr.web.att.com/pdf/al/h003.pdf</a><br><a href="http://cpr.web.att.com/pdf/al/q029.pdf">http://cpr.web.att.com/pdf/al/q029.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION  |
|------------------------------|--|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**Carbon Hill Business: Voice Grade Service - Series 2000 (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Project Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB7                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>AL PVL GB: B3.3, B9.1 USOC:</b><br>P2JHX, P2JWX, P2JUX, P2JQX |

| Product Retirement         |                                   |
|----------------------------|-----------------------------------|
| Service to be Discontinued | Voice Grade Service - Series 2000 |

| Service Description  |
|--|
| An analog channel for the transmission of asynchronous, or synchronous serial data at rates of up to 19.2, 50.0, or 230.4 Kbps. Optional arrangements are available for transmission of synchronous serial data rates at 18.74, or 40.8 Kbps. AccuPulse service is a digital, switched service that provides full duplex, 56 kilobits per second information transport via a specially equipped two-wire AccuPulse Access Line. Data Transport Access Channel Service provides the data channel facilities between a customer's premises and a central office. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link   |
|--|------------------------|--|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/h003.pdf">http://cpr.web.att.com/pdf/al/h003.pdf</a><br><a href="http://cpr.web.att.com/pdf/al/h009.pdf">http://cpr.web.att.com/pdf/al/h009.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

| Demand Count  |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**Carbon Hill Business: BellSouth Centrex Service; Multi-Serv (Multi-Serv Plus, Multi-Serv Multi-Account) (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB8                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>AL Gen Exchg GB: A12 USOC:</b><br>M1ACC,M1ACS,M4LFA,M4LFH,M4LSA,M1LFA,M1M5A |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | BellSouth Centrex Service; Multi-Serv (Multi-Serv Plus, Multi-Serv Multi-Account) |
|----------------------------|---|

**Service Description**

A hosted phone service with a user-friendly interface, built-in redundancy and 24-hour monitoring and maintenance.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/g012.pdf">http://cpr.web.att.com/pdf/al/g012.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| VDNAE         | AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution. Voice DNA leverages AT&T provided access, converging voice and data applications over one connection, providing our customers with carrier-class features. Eliminates the need for a PBX or IP PBX on the customer's premises. Delivers consistent feature/functionality across multi-locations. Network based, access for remote offices is easily achieved, with a variety of access types supported. Virtually any location can be connected. Lead offer in the 8+ Centrex Customer space. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| Office@Hand   | A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free. Delivered with a mobile first customer experience end to end. Integrated Plug & Ring Ready IP Phones and Softphone clients available. Back down offer to IP Based Offers in IP Green; POTS and Centrex customers. Back down offer in IP red with 4+ users (no requirement for AT&T managed IP services) |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**Carbon Hill Business 19.2 Kbps Service; DS0 - 2.4 Kbps Service; DS0 - 4.8 Kbps Service ; DS0 - 56 Kbps Service - ; DS0 - 64 Kbps Service - DS0 - 9.6 Kbps Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB9                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>AL Gen Exg GB: B7.2 USOC: IRS++, 2UN++, 3LB++, 6BN,SFS</b> |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | SynchroNet Service; DS0 - 19.2 Kbps Service; DS0 - 2.4 Kbps Service; DS0 - 4.8 Kbps Service ; DS0 - 56 Kbps Service - ; DS0 - 64 Kbps Service - DS0 - 9.6 Kbps Service |

| Service Description   |
|---|
| A channel for the digital transmission of synchronous serial data at discrete point-to-point bit rates of 2.4 Kbps, 4.8 Kbps, 19.2 Kbps 56 Kbps, 64 Kbps and 9.6 Kbps service |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/h007.pdf">http://cpr.web.att.com/pdf/al/h007.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**Carbon Hill Business : MegaLink, Integration Plus Management Services (IPMS) (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB11                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>AL PVL GG: B7.1 AL Gen Excg GB A32 USOC:</b><br>1LDP++,1LN++,CCO++,MGL++,VUM++,1PQW,1LD++,MLL++,P2JP1,<br>APF19, APF1A, APF9A, APF1A, APF9A, APF2D, APF4D, APF9D,<br>DSLWE |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | MegaLink Service (includes MegaLink Channel Service, MegaLink Plus Service, MegaLink Light Service), Integration Plus Management Services (IPMS) |

| Service Description   |
|---|
| AT&T Local Private Line Service is a dedicated, private and secure point-to-point connectivity between business locations, hosting centers, data centers and other service providers with safe, efficient and reliable communications at DS1 speeds using AT&T's network. The Integration Plus Management Services Terminal Interface chosen is utilized with either a switched service, private line service or web access service as a means of accessing FlexServ service. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link   |
|--|------------------------|--|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/h007.pdf">http://cpr.web.att.com/pdf/al/h007.pdf</a><br><a href="http://cpr.web.att.com/pdf/al/g032.pdf">http://cpr.web.att.com/pdf/al/g032.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps. Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

| Demand Count  |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**Carbon Hill Business: Lightgate Service, BellSouth Wavelength Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB12                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>AL PVL GB: B7.4 USOC:</b> 1LDP++, 1LN++, CCO++, MGL++, VUM++, 1PQW, 1LD++, MLL++, P2JP1, APF19, APF1A, APF9A, APF1A, APF9A, APF2D, APF4D, APF9D, DSLW |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | Lightgate Service, BellSouth Wavelength Service (Basic Arrangement) |
|----------------------------|---|

**Service Description**

AT&T Local Private Line Service is a dedicated, private and secure point-to-point connectivity between business locations, hosting centers, data centers and other service providers with safe, efficient and reliable communications at DS3 speeds using AT&T's network. BellSouth Wavelength service Basic Arrangement provides dedicated bandwidth over shared facilities in point-to-point service configurations.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/al/h007.pdf">http://cpr.web.att.com/pdf/al/h007.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**Carbon Hill Business: Flat Rate Main Station Line Service, individual line, Business; Flat Rate Auxiliary Line Service (Inward Service);, BellSouth Business Plus Service, Complete Choice For Business Package, AT&T Business Local Calling Assurance, AT&T Business Local Calling (BLC), BellSouth Business Choice Package**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB13                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>AL Gen Exchg:</b> A3.3, A3.4 <b>USOC:</b> 1FB, 1FBCL, MFB, MFBCL, 7FB, 7FBCL, 7MB OFB, YMB, OMB, BF1, BF1CL, BF2, BF2CL, COM++, PGOV1P |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | Flat Rate Main Station Line Service, individual line, Business; Flat Rate Auxiliary Line Service (Inward Service); (AL & FL Packages), BellSouth Business Plus Service, Complete Choice For Business Package, AT&T Business Local Calling Assurance, AT&T Business Local Calling (BLC), BellSouth Business Choice Package |

| Service Description  |
|--|
| A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 90.91 %         |
| HUGHESNET SATELLITE    |   | 90.91 %         |
| DISH NETWORK           | SATELLITE                               | 90.91 %         |
| DIRECTV SATELLITE      |   | 90.91 %         |
| Verizon Wireless       | WIRELESS LTE                            | 36.37 %         |
| Sprint                 | WIRELESS 3G                             | 68.19 %         |
| T-Mobile USA           | WIRELESS 3G                             | 90.91 %         |



**Carbon Hill Business: Flat Rate Service, PBX Trunks, Business - Combination - Out dial - Inward only - DID (Direct-In-Dial) - DID Combination (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB14                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>AL Gen Exch GB:</b> A20.3, A2.4.4, A3.2.1 <b>USOC:</b> TFC, TFU, TFN, TDD1X, TDDCX, TFBCX, |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | Flat Rate Service, PBX Trunks, Business - Combination - Out dial - Inward only - DID (Direct-In-Dial) - DID Combination |

| Service Description  |
|--|
| A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link   |
|--|------------------------|--|
|  |                        | <a href="http://cpr.web.att.com/pdf/rl/q003.pdf">http://cpr.web.att.com/pdf/rl/q003.pdf</a><br><a href="http://cpr.web.att.com/pdf/al/g020.pdf">http://cpr.web.att.com/pdf/al/g020.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features , plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET SAT          | ELLITE                                  | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV SAT            | ELLITE                                  | 100.00 %        |
| Sprint                 | WIRELESS 3G                             | 100.00 %        |
| T-Mobile USA           | WIRELESS 3G                             | 100.00 %        |



**Carbon Hill Business : Integrated Service Digital Network (ISDN), ISDN-Business (IBS) (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CHB15                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>Gen Exchg GB: A42.1 USOC: MI++, LQ++, EW++, QA++, PE++, PR7++, LP++, LT++</b> |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | Integrated Service Digital Network (ISDN), ISDN-Business (IBS) |

| Service Description  |
|--|
| ISDN - Business Service (IBS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IBS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IBS is provided through Basic Rate Access. Features are available to increase the capability of the Bearer Alternative Service and may be subscribed to on an as-needed basis. B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g042.pdf">http://cpr.web.att.com/pdf/fl/g042.pdf</a> |

| Next Generation Product Offer                |   |
|--|---|
| CATCH PRODUCT                                | CATCH PRODUCT DESCRIPTION   |
| U-verse High Speed Internet Business Edition | AT&T U-verse® High Speed Internet Business Edition provides customers with Internet access. Features include: Speeds up to 24Mbps downstream and up to 3Mbps upstream at a fraction of the cost of Private Line or Ethernet Internet access; reliability optimal performance, scalability and great security features; high capacity to support multiple employees that need simultaneous Internet access; the ability to support a Wi-Fi network for employees or customers. |

| Demand Count  |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |

Carbon Hill Business: AT&amp;T FastAccess Business DSL (includes Direct - Dry Loop option)



## EXHIBIT E -- PUBLIC VERSION -- PRODUCT DATA SHEETS

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Project Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | CB16                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | USOC (No guidebook ref) |
|-------------------------|--------------------|---------|-------------------------|
| Both Non-Dominant       |                    | 1857952 | ADL++                   |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | AT&T FastAccess Business DSL (includes Direct - Dry Loop option) |

| Service Description  |
|--|
| FastAccess® Business DSL is a digital data service that lets the customer send and receive data over existing telephone lines. FastAccess® Business DSL enables the customer to connect to the Internet at speeds much faster than a standard dial-up connection. With downstream speeds of up to 6 Mbps, FastAccess Business DSL 6.0—the fastest option—lets the customer quickly download files, view graphic-intensive websites, and even handle e-commerce transactions. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer                |   |
|--|---|
| CATCH PRODUCT                                | CATCH PRODUCT DESCRIPTION   |
| U-verse High Speed Internet Business Edition | AT&T U-verse® High Speed Internet Business Edition provides customers with Internet access. Features include: Speeds up to 24Mbps downstream and up to 3Mbps upstream at a fraction of the cost of Private Line or Ethernet Internet access; reliability optimal performance, scalability and great security features; high capacity to support multiple employees that need simultaneous Internet access; the ability to support a Wi-Fi network for employees or customers. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                              | Percent Covered |
| CHARTER COMMUNICATIONS | Cable C DOWN : 100 Mbps - C UP : 4 Mbps | 100.00 %        |
| HUGHESNET SAT          | ELLITE                                  | 100.00 %        |
| DISH NETWORK           | SATELLITE                               | 100.00 %        |
| DIRECTV SAT            | ELLITE                                  | 100.00 %        |
| Verizon Wireless       | WIRELESS LTE                            | 5.89 %          |
| Sprint                 | WIRELESS 3G                             | 82.36 %         |

# **King's Point, Business Market Product Data Sheets**

**PUBLIC VERSION**



**King's Point Business: Integrated Service Digital Network (ISDN), ISDN-Business (IBS) (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB1                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>FL Gen Exchg GB: A42 USOC</b><br>MI++,LQ++,EW++,QA++,PE++,PR7++,LP++,LT++ |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Integrated Service Digital Network (ISDN), ISDN-Business (IBS) |
|----------------------------|--|

**Service Description**

ISDN - Business Service (IBS) supports simultaneous transmission of voice, data, and packet services on the same exchange access line. Calling/Called Number Delivery, Calling Name Delivery, and Call Hold are included with this service. IBS provides a method of access to the telephone network called Basic Rate Access. Basic Rate Access consists of the ability to access up to two 64 Kbps (B) channels and one 16 Kbps (D) channel at the service delivery point. IBS is provided through Basic Rate Access. Features are available to increase the capability of the Bearer Alternative Service and may be subscribed to on an as-needed basis. B channel circuit switched services offer up to 64 Kbps intra-office transmission of voice or data. This option permits the customer to utilize either circuit voice or data transmission paths on a per call selection basis. Transmission on the B channel will be circuit switched at 64 Kbps within the switch and/or equipped facilities between ISDN compatible central offices.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g042.pdf">http://cpr.web.att.com/pdf/fl/g042.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                                | CATCH PRODUCT DESCRIPTION  |
|--|--|
| U-verse High Speed Internet Business Edition | AT&T U-verse® High Speed Internet Business Edition provides customers with Internet access. Features include: Speeds up to 24Mbps downstream and up to 3Mbps upstream at a fraction of the cost of Private Line or Ethernet Internet access. |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Presence**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100 %           |
| HUGHESNET SATELLITE |   | 100 %           |
| DIRECTV SATELLITE   |   | 100 %           |
| DISH NETWORK        | SATELLITE                                 | 100 %           |
| Verizon Wireless    | WIRELESS LTE                              | 100 %           |
| Sprint              | WIRELESS 3G                               | 100 %           |
| T-Mobile USA        | WIRELESS 3G                               | 100 %           |



**King's Point Business: Message Rate Service, Business Individual Line (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB2                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference         |
|-------------------------|--------------------|---------|-----------------------------|
| Intrastate Dominant     |                    | 1857952 | USOC: 1MB, Not in Guidebook |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Message Rate Service, Business Individual Line |
|----------------------------|--|

**Service Description**

A classification of exchange service which is charged on the basis of local usage as determined by the number of calls placed.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - A | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX equipment). |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Analysis**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 98.44 %         |
| HUGHESNET SAT       | ELLITE                                    | 98.44 %         |
| DIRECTV SAT         | ELLITE                                    | 98.44 %         |
| DISH NETWORK        | SATELLITE                                 | 98.44 %         |
| Verizon Wireless    | WIRELESS LTE                              | 98.44 %         |
| Sprint              | WIRELESS 3G                               | 98.44 %         |
| T-Mobile USA        | WIRELESS 3G                               | 98.44 %         |



**King's Point Business: Message Rate Service, Business Trunks, (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB3                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                 |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | FL Gen Exchg GB: A3.13.3<br>USOC TMC, TM5, TMU, TM3 |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | Message Rate Service, Business Trunks, |

| Service Description  |
|--|
| A classification of exchange service which is charged on the basis of local usage as determined by the number of calls placed. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook   |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

| Demand Count  |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**King's Point Business: Self-Healing Multi-Nodal Alternate Route Topology Ring (SmartRing) Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB4                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>FL Gen Exch GB: B7.7</b><br><b>USOC:</b><br>1HV++,SH++,NRCCN |

**Product Retirement**

|                            |  |
|----------------------------|--|
| Service to be Discontinued | Self-Healing Multi-Nodal Alternate Route Topology Ring (SmartRing) Service |
|----------------------------|--|

**Service Description**

SMARTRing SONET architecture uses a dual-fiber, self-healing ring with a primary path and a protected path HELPING TO prevent any single point of failure. Service automatically switches to the protected path if the primary path fails. All Rings are available in the standard speeds: Bandwidth/Speeds: OC-3, OC-12, OC-48, OC-192

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook   |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/h007.pdf">http://cpr.web.att.com/pdf/fl/h007.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|-----------------|---|
| New Product - E | Ultraviable Express is a DWDM service that will replace the various ILEC and T-Corp SONET Ring products. UVN Express provides the reliable and scalable Ring solution |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| UVN           | Ultraviable® Network Service (UVN) is a fully managed, high-speed, optical transport service that integrates Ethernet, Dense Wavelength Division Multiplexing (DWDM), and Native Wavelength technologies into a single end-to-end network solution. |

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

**Demand Count**

|   |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No records found. |            |                 |



**King's Point Business: Series 1000 Channels, Data Transport Access Channel Service Active**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB5                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>FL Gen Exchg GB: B3.2 USOC:</b><br>HB1++,WB1++,HE++,1L++4,O3N5O |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | Series 1000 Channels, Data Transport Access Channel Service |

| Service Description   |
|---|
| An analog channel for the transmission of asynchronous, or synchronous serial data at rates of up to 19.2, 50.0, or 230.4 Kbps. Optional arrangements are available for transmission of synchronous serial data rates at 18.74, or 40.8 Kbps. Data Transport Access Channel Service provides the data channel facilities between a customer's premises and a central office or between two central offices. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook   |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/h003.pdf">http://cpr.web.att.com/pdf/fl/h003.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION   |
|----------------------|---|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

| Demand Count  |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**King's Point Business: Voice Grade Service - Series 2000 (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB6                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Domin        | ant                | 1857952 | <b>FL Gen Exchg GB: B3.2</b><br><b>USOC: P2JHX, P2JWX, P2JUX, P2JQX, TMECS</b> |

**Product Retirement**

|                            |                                   |
|----------------------------|-----------------------------------|
| Service to be Discontinued | Voice Grade Service - Series 2000 |
|----------------------------|-----------------------------------|

**Service Description**

An analog channel for the transmission of asynchronous, or synchronous serial data at rates of up to 19.2, 50.0, or 230.4 Kbps. Optional arrangements are available for transmission of synchronous serial data rates at 18.74, or 40.8 Kbps.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/h003.pdf">http://cpr.web.att.com/pdf/fl/h003.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Analysis**

| COMPETITOR        | TECHNOLOGY | Percent Covered |
|-------------------|------------|-----------------|
| No Records found. |            |                 |



**King's Point Business: BellSouth Centrex Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB7                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Domin        | ant                | 1857952 | FL Gen Exchg GB: A112: USOC: M1ACC, M1ACS, M4LFA, M4LFH, M4LSA, M1LFA, M1M5A |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | BellSouth Centrex Service; Multi-Serv (Multi-Serv Plus, Multi-Serv Multi-Account), Centrex-CO Service, ESSX® Service - Vintage II |
|----------------------------|---|

**Service Description**

A hosted phone service with a user-friendly interface, built-in redundancy and 24-hour monitoring and maintenance. Group "A" and "B" Centrex-CO Services. ESSX® service Exchange Access Charge, Network Access Limiter, Flat Rate, Message Rate or Measured Rate AND ESSX® Service-VS and S. The ESSX® service-VS and S main station line rate will be composed of the intercom charge and the appropriate wire center line charge or equivalent.

|   |                    |                               |
|---|--------------------|-------------------------------|
| <b>Customer Notice: Product Grandfather</b> | <b>GRANDFATHER</b> | Disallow Adds, Moves, Changes |
|   |                    |                               |

|   |                               |   |
|---|-------------------------------|---|
| <b>Customer Notice: Service Discontinuance (Sunset)</b> | <b>SERVICE DISCONTINUANCE</b> | Guidebook link  |
|   |                               | <a href="http://cpr.web.att.com/pdf/al/g112.pdf">http://cpr.web.att.com/pdf/al/g112.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| VDNAE         | AT&T Voice DNA provides a network-hosted, Session Initiation Protocol (SIP)-based communications solution. Voice DNA leverages AT&T provided access, converging voice and data applications over one connection, providing our customers with carrier-class features. Eliminates the need for a PBX or IP PBX on the customer's premises. Delivers consistent feature/functionality across multi-locations. Network based, access for remote offices is easily achieved, with a variety of access types supported. Virtually any location can be connected. Lead offer in the 8+ Centrex Customer space |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| VDNAE         | A complete cloud based phone system, fully integrated VoIP with Bring Your Own Broadband (BYOB). Hosted PBX including local voice, US and Canada LD, Fax, SMS and toll free. Delivered with a mobile first customer experience end to end. Integrated Plug&Ring Ready IP Phones and Softphone clients available. Back down offer to IP Based Offers in IP Green; POTS and Centrex customers. Back down offer in IP red with 4+ users (no requirement for AT&T managed IP services) |

**Demand Count**

|   |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

**Competitive Analysis**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 92.86 %         |
| HUGHESNET SATELLITE |   | 92.86 %         |
| DIRECTV SATELLITE   |   | 92.86 %         |
| DISH NETWORK        | SATELLITE                                 | 92.86 %         |
| Verizon Wireless    | WIRELESS LTE                              | 92.86 %         |
| Sprint              | WIRELESS 3G                               | 92.86 %         |
| T-Mobile USA        | WIRELESS 3G                               | 92.86 %         |



**King's Point Business : SynchroNet Service- DS0 - 19.2 Kbps Service ; DS0 - 2.4 Kbps Service ; DS0 - 4.8 Kbps Service; DS0 - 19.2 Kbps Service; DS0 - 2.4 Kbps Service; DS0 - 4.8 Kbps Service; DS0 - 56 Kbps Service; DS0 - 64 Kbps Service; DS0 - 9.6 Kbps Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB8                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>FL Gen Exchg GB: B7.2 USOC: IRS++,2UN++,3LB++,6BN,SFS</b> |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | SynchroNet Service DS0 - 19.2 Kbps Service ; DS0 - 2.4 Kbps Service ; DS0 - 4.8 Kbps Service; DS0 - 19.2 Kbps Service; DS0 - 2.4 Kbps Service; DS0 - 4.8 Kbps Service; DS0 - 56 Kbps Service; DS0 - 64 Kbps Service; DS0 - 9.6 Kbps Service |

| Service Description   |
|---|
| A channel for the digital transmission of synchronous serial data at discrete point-to-point bit rates of 2.4 Kbps, 4.8 Kbps, 19.2 Kbps 56 Kbps, 64 Kbps and 9.6 Kbps service |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/tl/h007.pdf">http://cpr.web.att.com/pdf/tl/h007.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

| Demand Count  |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| No records found.    |            |                 |



**King's Point Business : MegaLink Service (includes MegaLink Channel Service, MegaLink Plus Service, MegaLink Light Service), Integration Plus Management Services (IPMS), SMARTPath Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB10                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | <b>FL PVL GB: B7.3 USOC:</b><br>1LDP++,1LN++,CCO++,MGL++,VUM++,1PQW,1LD++,MLL++,P2JP1 |

**Product Retirement**

|                            |   |
|----------------------------|---|
| Service to be Discontinued | MegaLink Service (includes MegaLink Channel Service, MegaLink Plus Service, MegaLink Light Service), Integration Plus Management Services (IPMS), SMARTPath Service |
|----------------------------|---|

**Service Description**

AT&T Local Private Line Service is a dedicated, private and secure point-to-point connectivity between business locations, hosting centers, data centers and other service providers with safe, efficient and reliable communications at DS1 speeds using AT&T's network. The Integration Plus Management Services Terminal Interface chosen is utilized with either a switched service, private line service or web access service as a means of accessing FlexServ service. (IPMSTI). SMARTPath service is a service for transmission of digital signals only and uses only digital transmission facilities.

|   |                    |                               |
|---|--------------------|-------------------------------|
| <b>Customer Notice: Product Grandfather</b> | <b>GRANDFATHER</b> | Disallow Adds, Moves, Changes |
|   |                    |                               |

|   |                               |   |
|---|-------------------------------|---|
| <b>Customer Notice: Service Discontinuance (Sunset)</b> | <b>SERVICE DISCONTINUANCE</b> | Guidebook Link  |
|   |                               | <a href="http://cpr.web.att.com/pdf/fl/h007.pdf">http://cpr.web.att.com/pdf/fl/h007.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps. Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

**Demand Count**

|   |   |   |   |
|---|---|---|---|
| Number of Customers   | ■ | Number of Services Without An AT&T Catch Product                          | ■ |
| Number of Customer Locations  | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
| Number of Services  | ■ | Number of Services Without AT&T or Competitive Catch Product              | ■ |
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |   |   |

**Competitive Analysis**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 6.67 %          |
| HUGHESNET SAT       | ELLITE                                    | 6.67 %          |
| DIRECTV SAT         | ELLITE                                    | 6.67 %          |
| DISH NETWORK        | SATELLITE                                 | 6.67 %          |
| Verizon Wireless    | WIRELESS LTE                              | 6.67 %          |
| Sprint              | WIRELESS 3G                               | 6.67 %          |
| T-Mobile USA        | WIRELESS 3G                               | 6.67 %          |



**King's Point Business: Lightgate Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB11                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                   |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | FL PVL GB B7.4<br>USOC:HFS++, 1PQ++ ,<br>1LP++, 1L8++ |

**Product Retirement**

|                            |                   |
|----------------------------|-------------------|
| Service to be Discontinued | Lightgate Service |
|----------------------------|-------------------|

**Service Description**

AT&T Local Private Line Service is a dedicated, private and secure point-to-point connectivity between business locations, hosting centers, data centers and other service providers with safe, efficient and reliable communications at DS3 speeds using AT&T's network.

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/h007.pdf">http://cpr.web.att.com/pdf/fl/h007.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps. Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. Six classes of service offering the right performance / SLA for your applications. Ethernet Private Line (EPL/EVPL) is offered for connections between two locations while Virtual Private LAN Service (VPLS) is for connections between 3 or more locations. |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Analysis**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 66.67 %         |
| HUGHESNET SAT       | ELLITE                                    | 66.67 %         |
| DIRECTV SAT         | ELLITE                                    | 66.67 %         |
| DISH NETWORK        | SATELLITE                                 | 66.67 %         |
| Verizon Wireless    | WIRELESS LTE                              | 66.67 %         |
| Sprint              | WIRELESS 3G                               | 66.67 %         |
| T-Mobile USA        | WIRELESS 3G                               | 66.67 %         |



**King's Point Business :Flat Rate Service, Business Service (Active)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB12                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference  |
|-------------------------|--------------------|---------|--|
| Intrastate Dominant     |                    | 1857952 | <b>FL Gen Exch GB: A3.4 USOC :</b><br>1FB,1FBCL,MFB,MFBCL,7FB,7FBCL,7MB,OFB,YMB,OMB,BF1,BF1CL,BF2,BF2CL,COM++,PGOV1P |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | FL) Flat Rate Service, Business Service, - Individual Line - Multi-line Exchange Access Line, (AL & FL) Flat Rate Auxiliary Line Service (Inward Service); (FL) Outgoing Only Service; (AL & FL Packages), BellSouth Business Plus Service, Complete Choice For Business Package, AT&T Business Local Calling Assurance, AT&T Business Local Calling (BLC), BellSouth Business Choice Package |

| Service Description  |
|--|
| A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETITOR             | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION    | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 86.13 %         |
| HOTWIRE COMMUNICATIONS | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 0.38 %          |
| HUGHESNET SATELLITE    |   | 86.50 %         |
| DIRECTV SATELLITE      |   | 86.50 %         |
| DISH NETWORK           | SATELLITE                                 | 86.50 %         |
| Verizon Wireless       | WIRELESS LTE                              | 86.50 %         |
| Sprint                 | WIRELESS 3G                               | 86.50 %         |
| T-Mobile USA           | WIRELESS 3G                               | 86.50 %         |



**King's Point Business: Flat Rate Service, PBX Trunks, Business (Active)**

| Wire Center | Legal Name of Service Provider    | Product Data Sheet #                             | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB13                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                                     |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | FL Gen Exch GB:A3 USOC<br>TFC,TFU,TFN,TDD1X,TDDCX,TFBCX |

| Product Retirement         |   |
|----------------------------|---|
| Service to be Discontinued | Flat Rate Service, PBX Trunks, Business - Combination - Out dial - Inward only - DID (Direct-In-Dial) - DID Combination |

| Service Description  |
|--|
| A classification of exchange access line service for which a stipulated charge is made, regardless of the amount of use. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g003.pdf">http://cpr.web.att.com/pdf/fl/g003.pdf</a> |

| Next Generation Product Offer |  |
|-------------------------------|--|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION  |
| New Product - A               | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION   |
|---------------|---|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring your own broadband from AT&T or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100.00 %        |
| HUGHESNET SAT        | ELLITE                                    | 100.00 %        |
| DIRECTV SAT          | ELLITE                                    | 100.00 %        |
| DISH NETWORK         | SATELLITE                                 | 100.00 %        |
| Verizon Wireless     | WIRELESS LTE                              | 100.00 %        |
| Sprint               | WIRELESS 3G                               | 100.00 %        |
| T-Mobile USA         | WIRELESS 3G                               | 100.00 %        |



**King's Point Business : AT&T FastAccess Business DSL (includes Direct - Dry Loop option)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Project Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB14                |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference |
|-------------------------|--------------------|---------|---------------------|
| Both Non-D              | ominant            | 1857952 | ADL++               |

| Product Retirement         |  |
|----------------------------|--|
| Service to be Discontinued | AT&T FastAccess Business DSL (includes Direct - Dry Loop option) |

| Service Description   |
|---|
| FastAccess® Business DSL is a digital data service that lets the customer send and receive data over existing telephone lines. FastAccess® Business DSL enables the customer to connect to the Internet at speeds much faster than a standard dial-up connection. With downstream speeds of up to 6 Mbps, FastAccess Business DSL 6.0—the fastest option— lets the customer quickly download files, view graphic-intensive websites, and even handle e-commerce transactions. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer                |  |
|--|--|
| CATCH PRODUCT                                | CATCH PRODUCT DESCRIPTION  |
| U-verse High Speed Internet Business Edition | AT&T U-verse® High Speed Internet Business Edition provides customers with Internet access Features include: Speeds up to 24Mbps downstream and up to 3Mbps upstream at a fraction of the cost of Private Line or Ethernet Internet access; reliability optimal performance, scalability and great security features; high capacity to support multiple employees that need simultaneous Internet access; the ability to support a Wi-Fi network for employees or customers. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis   |   |                 |
|------------------------|---|-----------------|
| COMPETIOR              | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION    | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 81.25 %         |
| HOTWIRE COMMUNICATIONS | Cable C DOWN : UNKNOWN - C UP : UNKNOWN   | 1.05 %          |
| HUGHESNET SAT          | ELLITE                                    | 82.30 %         |
| DIRECTV SAT            | ELLITE                                    | 82.30 %         |
| DISH NETWORK           | SATELLITE                                 | 82.30 %         |
| Verizon Wireless       | WIRELESS LTE                              | 82.30 %         |
| Sprint                 | WIRELESS 3G                               | 82.30 %         |
| T-Mobile USA           | WIRELESS 3G                               | 82.30 %         |



**King's Point Business : Back-Up Line, per Line, Business Plus Service Option1, Business Plus Option 2 (Grandfathered)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Trial Tracking Number |
|-------------|-----------------------------------|--|-----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | KPB15                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Guidebook Reference                           |
|-------------------------|--------------------|---------|---|
| Intrastate Dominant     |                    | 1857952 | FI Gen Exchg A103.38 USOC: SBLFX, SBLO1,SBLO2 |

**Product Retirement**

| Service to be Discontinued | Back-Up Line, per Line, Business Plus Service Option1, Business Plus Option 2 |
|----------------------------|---|
|----------------------------|---|

**Service Description**

|   |
|---|
| Back-Up Line is an optional service which provides individual line subscribers with an additional line which is available for inward and outward calling. Usage charges apply for all inward and outward calls. |
|---|

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.web.att.com/pdf/fl/g103.pdf">http://cpr.web.att.com/pdf/fl/g103.pdf</a> |

**Next Generation Product Offer**

| CATCH PRODUCT          | CATCH PRODUCT DESCRIPTION   |
|------------------------|---|
| U-verse Business Voice | All Distance US Domestic VoIP offer, integrated within the IP Broadband, Includes over 20 voice features, plus convenient web-based call management. Offers integrated business phone and wireless voicemail from a single mailbox. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| New Product B | Hosted IP product that combines local voice, domestic LD, and broadband with the ability to bring Broadband from us or a competitor. |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION  |
|---------------|--|
| IP Flex Reach | An integrated access, converged solution designed to deliver outbound, inbound, local and long distance calling over AT&T's Internet Protocol (IP) and Virtual Private Network (VPN) services. Also referred to as a Session Initiation Protocol (SIP) Trunking solution. Deployed in situations where customers own their own premises telephony (analog phones, key system, TDM PBX, or IP PBX) equipment. Lead offer in the 8+ line POTS Customer space |

| CATCH PRODUCT | CATCH PRODUCT DESCRIPTION |
|---------------|---------------------------|
|---------------|---------------------------|

**Demand Count**

| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|
|                     |  |  |  |

| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|
|                              |  |   |  |

| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|
|                    |  |  |  |

| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|
|   |  |

**Competitive Analysis**

| COMPETITIVE CATCH PRODUCT | COMPETITIVE PRODUCT DESCRIPTION           | Percent Covered |
|---------------------------|---|-----------------|
| COMCAST CORPORATION       | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 85.72 %         |
| HUGHESNET SATELLITE       |   | 85.72 %         |
| DIRECTV SATELLITE         |   | 85.72 %         |
| DISH NETWORK              | SATELLITE                                 | 85.72 %         |
| Verizon Wireless          | WIRELESS LTE                              | 85.72 %         |
| Sprint                    | WIRELESS 3G                               | 85.72 %         |
| T-Mobile USA              | WIRELESS 3G                               | 85.72 %         |



# **King's Point, Special Access Product Data Sheets**

## **PUBLIC VERSION**

**Kings Point Special Access: DS0 Services**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSA1                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))  |
|-------------------------|--------------------|---------|--|
| Interstate Dominant     | ant                | 1857952 | AT&T Southeast FCC Tariff 1 Section 7<br>USOC: T6ECS |

**Product Retirement**

|                              |   |
|------------------------------|---|
| Service to be Discontinued – | Voice Grade DS0 Services (2.4, 4.8, 9.6, 19.2, 56 and 64Kbps) - Local Channel counts (DS0 - IOF Mileage and Multiplexing is also to be retired) |
|------------------------------|---|

**Service Description**

|  |
|--|
| <b>DS0 Service:</b> A channel for the transmission of low speed data signals at six selected speeds: 2.4 Kbps, 4.8 Kbps, 9.6 Kbps, 19.2 Kbps, 56 Kbps and 64 Kbps. |
|--|

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.att.com/pdf/fcc/1007b.pdf">http://cpr.att.com/pdf/fcc/1007b.pdf</a> |

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, IPeFR, or PNT) via a Private Network Connection (PNC). |

| CATCH PRODUCT NAME | CATCH PRODUCT DESCRIPTION |
|--------------------|---------------------------|
| Wireless Data      | Product in development.   |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Customer Locations Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Customer Locations with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                                |  |  |  |
|--------------------------------|--|--|--|
| Number of Channel Terminations |  | Number of Customer Locations Without AT&T or Competitive Catch Product |  |
|--------------------------------|--|--|--|

|   |  |
|---|--|
| Number of Customer Locations with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Analysis**

| COMPETITOR          | TECHNOLOGY                                | Percent Covered |
|---------------------|---|-----------------|
| COMCAST CORPORATION | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100%            |
| HUGHESNET SAT       | ELLITE                                    | 100%            |
| DIRECTV SAT         | ELLITE                                    | 100%            |
| Verizon Wireless    | LTE                                       | 100%            |



**Kings Point Special Access: (DS-1 PL Services)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSA2                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))                            |
|-------------------------|--------------------|---------|--|
| Interstate Dominant     |                    | 1857952 | AT&T Southeast FCC Tariff 1 Section 7 USOC: TMECS , Florida PVL Guidebook B7.3 |

| Product Retirement           |  |
|------------------------------|--|
| Service to be Discontinued – | DS1 Local Channels, Mileage and Multiplexing |

| Service Description  |
|--|
| <b>DS1 Service:</b> A channel for the transmission of data signals at 1.544Mbps, the services can be channelized into 24 lower DS0 services or multiplexed up to ride a higher speed service (DS3 or OCn). |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.att.com/pdf/fcc/1007b.pdf">http://cpr.att.com/pdf/fcc/1007b.pdf</a> |

| CATCH PRODUCT                | CATCH PRODUCT DESCRIPTION   |
|------------------------------|---|
| AT&T Switched Ethernet (ASE) | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT        | CATCH PRODUCT DESCRIPTION  |
|----------------------|--|
| ANIRA Over Broadband | AT&T Network Based IP VPN Remote Access (ANIRA) provides secure access across the Internet for Single Users (dial, broadband, cellular/3G, WIFI, Wired Ethernet) using the AT&T Global Network Client (AGNC), and small, multi-user sites (SoHo Small Office, Home Office). ANIRA is a Network Based Remote Access IP VPN service. ANIRA connects to an existing AT&T Layer 3 VPN Networks (EVPN, AVPN, iPeFR, or PNT) via a Private Network Connection (PNC). |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Customer Locations Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Customer Locations with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                                |  |  |  |
|--------------------------------|--|--|--|
| Number of channel Terminations |  | Number of Customer Locations Without AT&T or Competitive Catch Product |  |
|--------------------------------|--|--|--|

|   |  |  |
|---|--|--|
| Number of Customer Locations with an AT&T Catch Product Available in their Service Area |  |  |
|---|--|--|

| Competitive Analysis |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 67%             |
| HUGHESNET SAT        | ELLITE                                    | 67%             |
| DISH Network         | SATELLITE                                 | 67%             |
| DIRECTV SAT          | ELLITE                                    | 67%             |
| Verizon Wireless     | LTE                                       | 67%             |
| Sprint 3G            |   | 67%             |



**Kings Point Special Access: (DS-3 Lightgate PL Services)**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSA3                 |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))  |
|-------------------------|--------------------|---------|--|
| Intrastate              | Dominant           | 1857952 | AT&T Southeast FCC Tariff 1 Section 7.2.9, AT&T Guidebook Part 11 Section 7.2.9 USOC: HTN, 1D3CA |

| Product Retirement           |   |
|------------------------------|---|
| Service to be Discontinued – | DS3, OC3, OC12, OC48 and OC192 – Local Channels, Mileage and Multiplexing |

| Service Description  |
|--|
| LightGate Service is a basic fiber optic based digital service. LightGates are sized from a DS3 level to an OC-192 level and can provide channelization capability for the customer in packages based on systems consisting of DS1, DS3, STS-1, OC-3, OC-12, OC-48 and OC192 channels. LightGate can aggregate traffic between a customer premises and a Central Office. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="http://cpr.att.com/pdf/fcc/1007b.pdf">http://cpr.att.com/pdf/fcc/1007b.pdf</a> |

| Next Generation Product Offer |   |
|-------------------------------|---|
| CATCH PRODUCT                 | CATCH PRODUCT DESCRIPTION   |
| AT&T Switched Ethernet (ASE)  | ASE offers Ethernet connectivity for customers with multiple locations in a metro area, with a variety of configurations to meet the customer's needs with flexibility to grow and adapt as the needs change. Ports are offered in 3 sizes: 100 Mbps, 1 Gbps, & 10 Gbps, Committed Information Rate (bandwidth) offered in 20 sizes: 2 Mbps to 10 Gbps. |

| CATCH PRODUCT   | CATCH PRODUCT DESCRIPTION   |
|---|---|
| Wave Length Channel Service (WCS)– Future AT&T Dedicated Ethernet (ADE) | WCS and ADE will be capable of provided Dedicated point to point Ethernet transmission at speeds of 1, 10 Gbps (Future 40 and 100Gbps) over a fiber optic facilities. |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Customer Locations Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Customer Locations with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                                |  |  |  |
|--------------------------------|--|--|--|
| Number of Channel Terminations |  | Number of Customer Locations Without AT&T or Competitive Catch Product |  |
|--------------------------------|--|--|--|

|   |  |
|---|--|
| Number of Customer Locations with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis |   |                 |
|----------------------|---|-----------------|
| COMPETITOR           | TECHNOLOGY                                | Percent Covered |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100%            |
| HUGHESNET SAT        | ELLITE                                    | 100%            |
| DISH Network         | SATELLITE                                 | 100%            |
| DIRECTV SAT          | ELLITE                                    | 100%            |
| Verizon Wireless     | LTE                                       | 100%            |
| Sprint 3G            |   | 100%            |
| COMCAST CORPORATION  | Cable C DOWN : 105 Mbps - C UP : 768 Kbps | 100%            |



**King's Point, Wholesale: DSL  
Transmission Service Product Data  
Sheets**

**PUBLIC VERSION**

**King's Point Wholesale: DSL Transmission Service**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | DSL Trans 01         |

| Regulatory Jurisdiction | Type of Regulation | FRN | Tariff Reference |
|-------------------------|--------------------|-----|------------------|
| n/a n/a                 |                    | n/a | N/A              |

**Product Retirement**

DSL Transmission Service

**Service Description**

The Service is provided between the Customer's designated End User premises and the Customer's End User Aggregation net work connection. It utilizes asymmetrical DSL technology over the high frequency portion of a DSL line. A DSL line is the physical facility between AT&T Southeast's DSLAM (or remote terminal where a remote terminal has been installed by AT&T Southeast) and the NID located at the End User premises ("DSL Line"). The Service requires an in-service, AT&T Southeast provided retail End User premises exchange line facility ("In-Service Exchange Line Facility"). An In-Service Exchange Line Facility shall mean the serving Central Office line equipment and all the plant facilities up to and including the AT&T Southeast provided NID. AT&T Southeast retains ownership of the DSL Line. The Service is not available over unbundled network elements ("UNEs").

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

**Next Generation Product Offer**

| CATCH PRODUCT NAME | CATCH PRODUCT DESCRIPTION |
|--------------------|---------------------------|
| N/A                |                           |

**Demand Count**

|                     |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |
|---------------------|--|--|--|

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

**Competitive Presence**

| COMPETITOR       | TECHNOLOGY | Percent Covered |
|------------------|------------|-----------------|
| No Records Found |            |                 |



# **Local Wholesale Complete Product Data Sheets**

## **PUBLIC VERSION**

**King's Point Wholesale : Local Wholesale Complete ("LWC")**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | W-LWC 1              |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | <b>LWC is not offered through tariff but by commercial contract.</b><br>Class of service USOCs with in-service units: UEPBX, UEPRX, UEPVB |

| Product Retirement           |   |
|------------------------------|---|
| Service to be Discontinued – | Local Wholesale Complete ("LWC"). The LWC services that exist and shall be retired within this wire center are LWC Business, LWC Residential and LWC Remote Call Forwarding for Business. |

| Service Description   |
|---|
| Local Wholesale Complete ("LWC") is an end-to-end wholesale access line that allows a Competitive Local Exchange Carrier ("CLEC") to lease facilities on a line by line variable basis to serve end users. It provides the ability to make and receive local call calls and access to switch-based vertical features. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Guidebook Link  |
|--|------------------------|---|
|  |                        | <a href="https://clec.att.com/clec/shell.cfm?section=2545">https://clec.att.com/clec/shell.cfm?section=2545</a> |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| TBD                           | TBD                       |

| Demand Count  |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

| Competitive Analysis      |                                 |                 |
|---------------------------|---------------------------------|-----------------|
| COMPETITIVE CATCH PRODUCT | COMPETITIVE PRODUCT DESCRIPTION | Percent Covered |
| No Records Found          |                                 |                 |



**Carbon Hill Wholesale : Local Wholesale Complete ("LWC")**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | W-LWC 2              |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Intrastate              | Dominant           | 1857952 | <b>LWC is not offered through tariff but by commercial contract.</b><br>Class of service USOCs with in-service units: UEPBX and UEPRX |

| Product Retirement   |  |
|--|--|
| Service to be Discontinued – services that fall under the Product type are listed here | Local Wholesale Complete ("LWC"). The LWC services that exist and shall be retired within this wire center are LWC Business and LWC Residential. |

| Service Description   |
|---|
| Local Wholesale Complete ("LWC") is an end-to-end wholesale access line that allows a Competitive Local Exchange Carrier ("CLEC") to lease facilities on a line by line variable basis to serve end users. It provides the ability to make and receive local call calls and access to switch-based vertical features. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
| ■                                    | ■           | ■                             |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE | Planned Date of Final Customer Notice of Service Discontinuance Guidebook Link                                  |
|--|------------------------|---|
| ■  | ■                      | <a href="https://clec.att.com/clec/shell.cfm?section=2545">https://clec.att.com/clec/shell.cfm?section=2545</a> |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| TBD                           | TBD                       |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis      |                                 |                 |
|---------------------------|---------------------------------|-----------------|
| COMPETITIVE CATCH PRODUCT | COMPETITIVE PRODUCT DESCRIPTION | Percent Covered |
| No Records Found          |                                 |                 |

# **Wholesale Switched Access Product Data Sheets**

## **PUBLIC VERSION**



**King's Point Wholesale: Switched Access Feature Group D**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | Bellsouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSWI 1               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both                    | Dominant           | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1 Section 6.1.1 (D)<br>BELLSOUTH TELECOMMUNICATIONS FLORIDA ACCESS SERVICES TARIFF Section 6.1.1 (D) |

| Product Retirement         |                                 |
|----------------------------|---------------------------------|
| Service to be Discontinued | Switched Access Feature Group D |

| Service Description  |
|--|
| BellSouth SWA FGD, which is available to all customers, provides trunk side access to Telephone Company end office switches with an associated uniform 101XXXX access code for the customer's use in originating and terminating communications. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer   |  |
|---|--|
| CATCH PRODUCT NAME  | CATCH PRODUCT DESCRIPTION  |
| IP Interconnection for exchange of traffic with all AT&T VoIP end Users | Provides a IP interconnection to the customer for the exchange of traffic with all AT&T VoIP end users |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| N/A                  |            |                 |

**King's Point Wholesale: Switched Access Feature Group B**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSWI 2               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both Domin              | ant                | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1<br>Section 6.1.1 (B)<br>BELLSOUTH TELECOMMUNICATIONS FLORIDA ACCESS<br>SERVICES TARIFF Section 6.1.1 (B) |

| Product Retirement         |                                 |
|----------------------------|---------------------------------|
| Service to be Discontinued | Switched Access Feature Group B |

| Service Description  |
|--|
| BellSouth SWA FGB, which is available to all customers, provides trunk side access to Telephone Company end office switches with an associated uniform 950-XXXX access code for the customer's use in originating and terminating communications to an Interexchange Carrier's interstate service or a customer provided interstate communications capability. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| none                          | N/A                       |

| Demand Count  |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| N/A                  |            |                 |



**King's Point Wholesale: Switched Access Feature Group A**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| DLBHFLKP    | BellSouth Telecommunications, LLC | AT&T Florida (BellSouth Telecommunications, LLC) | WSWI 3               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both                    | Dominant           | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1<br>Section 6.1.1 (A)<br>BELLSOUTH TELECOMMUNICATIONS FLORIDA ACCESS<br>SERVICES TARIFF Section 6.1.1 (A) |

| Product Retirement   |                                 |
|--|---------------------------------|
| Service to be Discontinued – services that fall under the Product type are listed here | Switched Access Feature Group A |

| Service Description  |
|--|
| BellSouth SWA FGA, which is available to all customers, provides line side access to Telephone Company end office switches with an associated seven digit local telephone number for the customer's use in originating and/or terminating communications to another customer's interstate service or a customer provided interstate communications capability. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| None                          |                           |

| Demand Count        |  |  |  |
|---------------------|--|--|--|
| Number of Customers |  | Number of Services Without An AT&T Catch Product |  |

|                              |  |   |  |
|------------------------------|--|---|--|
| Number of Customer Locations |  | Number of Services with a Competitive Catch Product in their Service Area |  |
|------------------------------|--|---|--|

|                    |  |  |  |
|--------------------|--|--|--|
| Number of Services |  | Number of Services Without AT&T or Competitive Catch Product |  |
|--------------------|--|--|--|

|   |  |
|---|--|
| Number of Services with an AT&T Catch Product Available in their Service Area |  |
|---|--|

| Competitive Analysis  |  |                 |
|-----------------------|--|-----------------|
| COMPETITOR TECHNOLOGY |  | Percent Covered |
| N/A                   |  |                 |

**Carbon Hill Wholesale: Switched Access Feature Group D**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNM    | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | WSWI 4               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both Dominant           |                    | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1 Section 6.1.1 (D)<br>BELLSOUTH TELECOMMUNICATIONS ALABAMA ACCESS SERVICES TARIFF Section 6.1.1 (D) |

| Product Retirement   |                                 |
|--|---------------------------------|
| Service to be Discontinued – services that fall under the Product type are listed here | Switched Access Feature Group D |

| Service Description  |
|--|
| BellSouth SWA FGD, which is available to all customers, provides trunk side access to Telephone Company end office switches with an associated uniform 101XXXX access code for the customer's use in originating and terminating communications. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer   |  |
|---|--|
| CATCH PRODUCT NAME  | CATCH PRODUCT DESCRIPTION  |
| IP Interconnection for exchange of traffic with all AT&T VoIP end Users | Provides a IP interconnection to the customer for the exchange of traffic with all AT&T VoIP end users |

| Demand Count  |  |   |  |
|---|--|---|--|
| Number of Customers   |  | Number of Services Without An AT&T Catch Product                          |  |
| Number of Customer Locations  |  | Number of Services with a Competitive Catch Product in their Service Area |  |
| Number of Services  |  | Number of Services Without AT&T or Competitive Catch Product              |  |
| Number of Services with an AT&T Catch Product Available in their Service Area |  |   |  |

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| N/A                  |            |                 |



**Carbon Hill Wholesale: Switched Access Feature Group B**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNMRS0 | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | WSWI 5               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both                    | Dominant           | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1 Section 6.1.1 (B)<br>BELLSOUTH TELECOMMUNICATIONS ALABAMA ACCESS SERVICES TARIFF Section 6.1.1 (B) |

| Product Retirement           |                                 |
|------------------------------|---------------------------------|
| Service to be Discontinued – | Switched Access Feature Group B |

| Service Description  |
|--|
| BellSouth SWA FGB, which is available to all customers, provides trunk side access to Telephone Company end office switches with an associated uniform 950-XXXX access code for the customer's use in originating and terminating communications to an Interexchange Carrier's interstate service or a customer provided interstate communications capability. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| none                          |                           |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| N/A                  |            |                 |

**Carbon Hill Wholesale: Switched Access Feature Group A**

| Wire Center | Legal Name of Service Provider    | d/b/a Name of Service Provider                   | Product Data Sheet # |
|-------------|-----------------------------------|--|----------------------|
| CRHLALNMRS0 | BellSouth Telecommunications, LLC | AT&T Alabama (BellSouth Telecommunications, LLC) | WSWI 6               |

| Regulatory Jurisdiction | Type of Regulation | FRN     | Tariff Reference (Tariff Name, Section and USOC(s))   |
|-------------------------|--------------------|---------|---|
| Both                    | Dominant           | 1857952 | BELLSOUTH TELECOMMUNICATIONS TARIFF F.C.C. NO. 1 Section 6.1.1 (A)<br>BELLSOUTH TELECOMMUNICATIONS ALABAMA ACCESS SERVICES TARIFF Section 6.1.1 (A) |

| Product Retirement           |                                 |
|------------------------------|---------------------------------|
| Service to be Discontinued – | Switched Access Feature Group A |

| Service Description  |
|--|
| BellSouth SWA FGA, which is available to all customers, provides line side access to Telephone Company end office switches with an associated seven digit local telephone number for the customer's use in originating and/or terminating communications to another customer's interstate service or a customer provided interstate communications capability. |

| Customer Notice: Product Grandfather | GRANDFATHER | Disallow Adds, Moves, Changes |
|--------------------------------------|-------------|-------------------------------|
|                                      |             |                               |

| Customer Notice: Service Discontinuance (Sunset) | SERVICE DISCONTINUANCE |
|--|------------------------|
|  |                        |

| Next Generation Product Offer |                           |
|-------------------------------|---------------------------|
| CATCH PRODUCT NAME            | CATCH PRODUCT DESCRIPTION |
| None                          |                           |

| Demand Count        |   |  |   |
|---------------------|---|--|---|
| Number of Customers | ■ | Number of Services Without An AT&T Catch Product | ■ |

|                              |   |   |   |
|------------------------------|---|---|---|
| Number of Customer Locations | ■ | Number of Services with a Competitive Catch Product in their Service Area | ■ |
|------------------------------|---|---|---|

|                    |   |  |   |
|--------------------|---|--|---|
| Number of Services | ■ | Number of Services Without AT&T or Competitive Catch Product | ■ |
|--------------------|---|--|---|

|   |   |
|---|---|
| Number of Services with an AT&T Catch Product Available in their Service Area | ■ |
|---|---|

| Competitive Analysis |            |                 |
|----------------------|------------|-----------------|
| COMPETITOR           | TECHNOLOGY | Percent Covered |
| N/A                  |            |                 |



# Exhibit F

Dear Valued Customer,

At AT&T, our most important job is making sure that the connections we offer our customers and businesses are safe, strong and reliable. As an AT&T business customer in Carbon Hill, Alabama, your experience with AT&T will be my highest priority and among the most important priorities for our company.

More of our business customers are connecting using new technologies – like wireless and Internet-based phones (that is, phones that use Voice-over-Internet-Protocol — or “VoIP” — technology). We want to make sure that you have access to the communications tools your business needs to seamlessly connect with your customers and to the network of the future.

The Federal Communications Commission (FCC), the federal agency that regulates telecommunications services, has called on companies like AT&T to submit proposals for conducting trials where these connections and services will be rolled out in a community and offered to consumers and businesses, while ensuring the values of universal service, competition, public safety, reliability and consumer protection continue to be met.

AT&T has proposed to include Carbon Hill, Alabama as one of two locations nationwide for a multi-year trial to be overseen by the FCC.

AT&T will work responsibly, openly and transparently with local and state government, the FCC, and most importantly, **with you** throughout this process. And all of this will be happening while the traditional telephone network is still in place. We are committed to meeting and exceeding your expectations, while also giving you access to the benefits that a modern network provides your business with.

We want to make sure that you are informed and can be involved in the process. **We will be holding meetings and events throughout the community. For more information on those, or anything else related to the trial, please visit our website at: <http://ip4carbonhill.att.com>. Or you can call us at 866-992-9357.**

As a lifelong Alabaman, I am pleased that Carbon Hill was selected as one of the trial locations to help ensure that businesses across America – including those in small towns and rural areas – have access to the services modern networks can deliver. AT&T and its Alabama employees consider themselves a part of the fabric of the communities where we live and work. We aren't just providing a service to our customers and businesses; we are connecting our neighbors and communities.

Thank you for your business. We look forward to working with you on this exciting opportunity for our customers and for our company.

Sincerely,

A handwritten signature in cursive script, reading "Fred McCallum".

Fred McCallum, President AT&T Alabama



Dear (INSERT CUSTOMER NAME HERE),

At AT&T, our most important job is making sure that the connections we offer our customers are safe, strong and reliable. I am writing today because, as an AT&T customer in Carbon Hill, Alabama, your experience with AT&T is among the most important priorities for our company.

More of our customers are choosing to connect using newer technologies – like wireless and Internet-based phones (that is, phones that use Voice-over-Internet-Protocol — or “VoIP” — technology) – that deliver voice, Internet and video at home and away.

The Federal Communications Commission (FCC), the federal agency that regulates telecommunications service, has called on companies like AT&T to submit proposals for conducting trials where these connections and services will be rolled out in a community and offered to consumers, all while ensuring the values of universal service, competition, public safety, reliability and consumer protection continue to be met.

I am writing to share the news that AT&T has proposed to include Carbon Hill, Alabama as one of two locations nationwide for a multi-year trial that will be overseen by the FCC.

AT&T will work responsibly, openly and transparently with local and state government, the FCC, and, most importantly, **with you** throughout this process. And all of this will be happening while the traditional telephone network is still in place. We are committed to meeting and exceeding your expectations regarding the benefits that a modern network provides. We want to make sure you are kept informed and can be involved. Your voice and experience will help inform future efforts to roll out these technologies to cities, small towns and rural communities across America.

**My team and I will be here to answer questions, and keep you posted. We will be holding meetings and events throughout the community. For more information on those, or anything else related to the trial, please visit our website at: <http://ip4carbonhill.att.com>. Or you can call us at: 855-920-0066 (in English) or 855-920-0072 (in Spanish).**

As a lifelong Alabaman, I am pleased that Carbon Hill was selected as one of the trial locations to help ensure that communities across America – including small towns and rural areas – have access to the services modern networks can deliver. AT&T and its Alabama employees consider themselves a part of the fabric of these communities. We live and work here, send our children and grandchildren to local schools, cheer on the local sports teams and shop at the local stores. We aren't just providing a service to customers; we are connecting our neighbors and communities.

Thank you for your business. We look forward to working with you on this exciting opportunity for our customers and for our company.

Sincerely,

A handwritten signature in cursive script, reading "Fred McCallum".

Fred McCallum, President AT&T Alabama

Dear Valued Customer,

Last year, I was honored to be named the President of AT&T Florida. As an AT&T business customer in the West Delray Beach area of Florida, your experience with the company is my top priority. We are committed to providing safe, strong and reliable connections for our customers and businesses. And your satisfaction is among the most important priorities for AT&T.

Our business and residential customers are increasingly using newer technologies like wireless and Internet-based service rather than traditional services.

We are investing and building out new and enhanced connections for our business customers so that you can communicate using next-generation products and applications. We are committed to ensuring these connections are safe, strong and reliable.

The Federal Communications Commission (FCC), the federal agency that regulates telecommunications service, has called on companies like AT&T to submit proposals for conducting trials where these new connections and services will be rolled out in a community and offered to consumers and businesses, all while ensuring the values of universal service, competition, public safety, reliability and consumer protection continue to be met.

AT&T has proposed to include the West Delray Beach area of Florida as one of two U.S. locations for a multi-year trial to be overseen by the FCC. Throughout the trial process, AT&T is committed to working openly and transparently with our business customers, local and state government, and the FCC. This process will occur while the traditional telephone network is still in place.

We are committed to meeting and exceeding your expectations regarding the benefits that a modern network provides. We want to make sure you are kept informed and can be involved in the process. Your voice and experience will help shape future efforts to roll out these technologies to businesses across America.

**We will be holding meetings and town halls throughout the community, watch for locations, dates and times. For more information on these events and anything else related to the trial, please visit <http://ip4westdelraybeach.att.com>. Or you can reach us at 866-992-9357.**

We want to make sure that our business customers, no matter their size, can be part of this process. AT&T is committed to bringing Floridians the connections and technology they want and need. You aren't just our customers, you are our friends and neighbors, and our commitment reflects this.

Thank you for being an AT&T customer. We look forward to working with you during this exciting opportunity.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. York".

Joe York, President AT&T Florida





[Date]

Dear [Customer Name],

Last year, I was honored to be named the President of AT&T Florida. As an AT&T customer in the West Delray Beach area of Florida, your experience with the company is my top priority. We are committed to providing safe, strong and reliable connections for our customers. And your satisfaction is among the most important priorities for AT&T.

Our customers are increasingly using newer technologies – like wireless and Internet-based services that can deliver voice, Internet and video at home and away. We are investing and building out new and enhanced connections for our customers so you can communicate using next-generation products and applications. We are committed to ensuring that these connections are safe, strong and reliable.

The Federal Communications Commission (FCC) the federal agency that regulates telecommunications service, has called on companies like AT&T to submit proposals for conducting trials where these new connections and services will be rolled out in a community and offered to consumers, all while ensuring the values of universal service, competition, public safety, reliability and consumer protection continue to be met.

AT&T has proposed to include the West Delray Beach area of Florida as one of two locations for a multi-year trial to be overseen by the FCC. This process will occur while the traditional telephone network is still in place. Throughout the trial process, AT&T is committed to working openly and transparently with our customers, local and state government, and with the FCC.

We are committed to meeting and exceeding your expectations regarding the benefits that a modern network provides. We want to make sure you are kept informed and can be involved. Your voice and experience will help shape future efforts to roll out these technologies nationwide.

We want customers of all ages to take part in this process. Last year, we partnered with national and local organizations to host events across the state where consumers had an opportunity to learn about new products and services. We will be holding events like these in the West Delray Beach area as part of the trial.

**We will be holding meetings and town halls throughout the community, watch for locations, dates and times. For more information on these events and anything else related to the trial, please visit <http://ip4westdelraybeach.att.com>. Or you can reach us at 855-920-0066 (in English) and 855-920-0072 (in Spanish).**

AT&T is committed to bringing Floridians the connections and technology they want and need. You aren't just our customers, you are our friends and neighbors, and our commitment reflects this.

Thank you for being an AT&T customer. We look forward to working with you during this exciting opportunity for our customers and for our company.

Signed,

  
Joe York, President AT&T Florida

# Exhibit G



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EXHIBIT G  
G3ict WHITE PAPER

Case Study White Paper Series

How a culture of inclusion and the adoption of  
Universal Design at AT&T drive business processes to  
serve persons with disabilities

# Accessibility, Innovation and Sustainability at AT&T

# G3ict

Global Initiative for Inclusive Information  
and Communication Technologies



A Flagship Advocacy Initiative  
of the United Nations Global Alliance  
for ICT and Development





## About G3ict

G3ict is an Advocacy Initiative of the United Nations Global Alliance for ICT and Development, launched in December 2006 in cooperation with the Secretariat for the Convention on the Rights of Persons with Disabilities at UN DESA. Its mission is to facilitate and support the implementation of the dispositions of the Convention on the Rights of Persons with Disabilities promoting e-accessibility and assistive technologies. G3ict participants include industry, the public sector, academia and organizations representing persons with disabilities. G3ict relies on an international network of ICT accessibility experts to develop practical tools, evaluation methods and benchmarks for States Parties and Disabled Persons Organizations to implement policies in support of assistive technologies and e-accessibility. Since inception, G3ict has organized or contributed to 79 awareness raising and capacity building programs for policy makers in cooperation with international organizations such as the ITU, UNESCO, UNITAR and the World Bank. G3ict co-produces with ITU the "e-Accessibility Policy Toolkit for Persons with Disabilities" ([www.e-accessibilitytoolkit.org](http://www.e-accessibilitytoolkit.org)) which is widely used around the world by policy makers involved in the implementation of the Convention on the Rights of Persons with Disabilities. For additional information on G3ict, visit [www.g3ict.org](http://www.g3ict.org)

## Acknowledgments

G3ict wishes to express its sincere appreciation to AT&T for opening its door to document this case study and to the many individuals and organizations who participated in the data collection and multiple interviews conducted during this inquiry. Our special appreciation goes to:

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**Mark Witcher** - General Attorney & Associate General Counsel  
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**Amanda Stent** - AT&T Research - Principal Member of Technical Staff

AT&T's Advisory Panel on Access & Aging (AAPAA)  
AT&T Labs  
Citizenship and Sustainability  
Consumer Sales and Service  
EcoSystem and Innovation  
Global Public Policy  
HR Diversity

G3ict editorial team: Francesca Cesa Bianchi, Nilofar Ansher, David Ross.  
Design by Manuel Ortiz - [www.modesignstudio.com](http://www.modesignstudio.com)

## Special Mentions

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1110 W. Peachtree Street, NW Atlanta, GA 30309-3609 – U.S.A.



# Foreword

For aging adults and persons living with disabilities, as for everyone, communications are essential to increased productivity, independent living, a sense of well-being and safety. Communications technology enables individuals with disabilities (and those without) to participate in social, educational and economic activities; retrieve information; receive warnings from government authorities in emergencies; and conduct a number of essential tasks that require access to phone or web services. Accessibility of communications is vital for an ever larger population of customers. In the United States, 54 million persons are identified by the U.S. Census Bureau as living with disabilities. Of those ages 65 and older, 52 percent live with a disability.

While accessibility is required by law, it is also an important element of a company's citizenship and sustainability strategy, as well as a market and employment opportunity. Many companies, however, have yet to fully integrate accessibility across companywide business divisions and into their product development and services design. Accessibility is a complex, multi-faceted discipline, one that can only be successfully implemented with the full participation and engagement of a number of business functions in large organizations and buy-in from senior leadership.

This case study describes how AT&T has integrated accessibility into its activities, from product development, human resources and talent retention to recruitment, marketing and customer service. As is often the case, AT&T's achievements result from a combination of factors: a rich history of developing products for persons with disabilities that dates back to the company's founder, a clearly defined set of citizenship and sustainability objectives, a commitment to Universal Design and, perhaps most importantly, a desire to involve persons with disabilities in these internal processes.

Our sincere appreciation goes to AT&T for opening its doors to G3ict and for sharing its experience with other corporations, disability and aging organizations, and the many stakeholders involved in promoting the accessibility of information and communication technologies.



Axel Leblois  
Executive Director, G3ict





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# Why Accessibility Matters

## Key Facts

At AT&T, knowledge of demographic realities is a key component of promoting Universal Design and assistive functionalities for products and services, and an integral part of the company's sustainability strategy:

### Persons with disabilities in the United States

- 54.4 million, or 17 percent of the population, on the rise from previous U.S. Census (2002)
- 35 million (12 percent) with a severe disability
- 69 percent of those ages 21 – 64 with a severe disability are unemployed
- 30 percent of households have a family member with disabilities

### Among persons 15 and older

- 7.8 million (3 percent) had difficulty hearing a regular conversation, with 1 million unable to hear at all. 4.3 million persons reported using a hearing aid.
- 3.3 million persons (1 percent) ages 15 and older used a wheelchair or similar device, with 10.2 million (4 percent) using a cane, crutches or walker.
- 7.8 million had difficulty seeing words or letters in ordinary newspaper print, including 1.8 million who were completely unable to see.
- More than 16 million had difficulty with cognitive, mental or emotional functioning.

### Among ages 65 and older

- 52 percent had a disability and 37 percent have a severe disability.

### Among ages 80 and older

- 71 percent had a disability, including 56 percent who have a severe disability.

**Source:** Matthew W. Brault, *Americans with Disabilities: 2005, Current Population Reports, P70-117*, U.S. Census Bureau, Washington, DC. 2008.  
See [www.census.gov/prod/2008pubs/p70-117.pdf](http://www.census.gov/prod/2008pubs/p70-117.pdf)

## How is Disability Measured?

The U.S. Census Bureau was among the first government agencies in the world to shift the measurement of disability away from the outdated medical model and to adopt functional measurements of disability, which provide far more accurate disability demographics. Questions are asked about an individual's ability to perform certain tasks, rather than asking to disclose medical conditions. For example, aging adults with macular degeneration who lose central vision may not be able to read a mobile phone screen. However, because their peripheral vision remains, they would not self-report as "blind" in the context of a traditional survey or questionnaire. The new methodology identifies such disabilities with questions about one's ability to read a newspaper.





AT&T Executive, Susan Mazrui (Global Public Policy), presenting at the NDI REI Tour National Press Club Kick Off event, October 2010.



Left to right: Gregg Vanderheiden (University of Wisconsin-Madison), Susan Mazrui (Global Public Policy), Tari Hartman Squire (AT&T Consultant) and Larry Goldberg (AAPAA member, WGBH National Center for Accessible Media) at the White House for the ADA 20th anniversary celebration event, July 2010.

### Question: What is Disability?

According to the Preamble of the United Nations Convention on the Rights of Persons with Disabilities, signed as of December 2010 by 144 countries including the United States, "Disability is an evolving concept. It results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others." Over the past two decades, this social definition of disability has been universally endorsed around the world, while the medical definition, which focuses solely on a person's impairment, has been abandoned. It implies that society at large is responsible for eliminating barriers to access and ensuring full participation of persons living with disabilities. Disability is viewed as the intersection of the person and the built, electronic, or attitudinal environment.

### Universal Design

The Convention on the Rights of Persons with Disabilities states:

"Universal Design" means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. "Universal Design" shall not exclude assistive devices for particular groups of persons with disabilities where this is needed. (Article 2)

States Parties undertake or promote research and development of universally designed goods, services, equipment and facilities, as defined in Article 2 of the present Convention, which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to promote Universal Design in the development of standards and guidelines. (Article 4.1.f)

"Universal Design" means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design."

# The Inner Workings of Accessible Product Design at AT&T

## Managing Accessibility along the Product Development Cycle

Making technology work for all requires a disciplined approach to product design. Evaluating a product's accessibility at an early stage of its development significantly reduces the cost of providing accessible features. Retrofitting a non-accessible product can be very expensive, when it is even possible. This is why, from the conception of a product or service, AT&T applies user-centered design. User-centered design calls for a deep knowledge and understanding of human factors, or how individuals with different mixes of abilities, needs and limitations interact with their environment.

This approach includes tools that help product development teams evaluate the accessibility and usability of products. For example, one of the components in AT&T's standard project process is to identify Universal Design requirements using accessibility checklists, which prompt the product development teams to think about how a person with a disability might use their product. Their evaluation is then entered into the checklists and becomes part of the official documentation of each project.

### Start with the user



### Design and Development

### End with the user



- Who users are
- What users want
- What users know
- How users work
- User capabilities
- User limitations

- Objective user testing
- Subjective user evaluation
- Post-deployment analysis
- Iteration of design

*User Centric Design and Development: Start with the user;  
Design and Development; End with the user.*





*Human Factors Lab: A control room where experimenters observe customers interacting with AT&T products and services.*

AT&T has established a "Human Factors Group" to test many of the company's designs in order to evaluate the accessibility and usability of products and services. When appropriate, the team invites aging adults and persons with disabilities to take part in these studies. AT&T professionals have experience with accessibility issues and frequently participate in local accessible technology groups. They also support their peers throughout the company in matters of accessibility of products or services.

For example, the Human Factors Group helped develop the ANSI/HFES 200 standard (Human Factors Engineering of Software). The objective of this standard is to provide design requirements and recommendations that make software more accessible and easier to learn and use. The ultimate beneficiaries are the end users of software, whose needs motivated the design recommendations in HFES 200. The application of this standard is intended to provide user interfaces that are more usable, accessible and consistent and that enable greater productivity and satisfaction. Its main components cover accessibility, interaction techniques, interactive voice response (IVR) and visual presentation and use of color.

AT&T does not develop or manufacture customer equipment such as handsets, although it does resell products from third-party vendors. Nevertheless, the company is committed to offering a range of equipment operating on its network that is accessible and usable to customers both with and without disabilities. Besides applying accessibility rules embedded in its own product development processes, AT&T collaborates with handset manufacturers and third-party accessibility, aging, technology and disability organizations to collect input on optimum accessibility specifications. AT&T also works with nongovernmental organizations (NGOs) for recommendations and assessments of product accessibility and usability.

### How the Human Factors Group Works at AT&T

The Human Factors Group at AT&T conducts customer research, analysis, design and usability testing to help develop products and services that are accessible, useful and usable for customers with and without disabilities. The fundamental goal of the Human Factors Lab is to learn and adjust product design in the lab from inception, rather than after a product or service is deployed to tens of millions of customers.

The Human Factors Group supports product development project teams within relevant divisions of the company and champions the needs of customers. Members bring their technical background in the human factors profession, drawing on knowledge from both industrial engineering and psychology. The group uses scientific data collection techniques to find out how customers want to use services and how they think they should work. Most of that research is conducted in the Human Factors Labs, located in Austin, Texas, and Atlanta, Georgia. The labs are capable of testing any service AT&T provides, from traditional phone services, automated voice response systems, and web sites, to cutting-edge mobile devices and television services. The Human Factors Group has conducted studies with thousands of customers to find out how they interact with new products or services.

A key benefit of having actual customers test services in the Human Factors Lab is that it enables engineers to get the customer's perspective firsthand, a perspective that may differ from an engineer's.



### Addressing Customers' Diverse Abilities

There is no such thing as a "typical" customer. What customers need and how they use products and services varies. For example, customers who are blind surf the web, too, but instead of seeing web pages, they listen as the text on the screen is read aloud by software called a "screen reader." Listening to a web page, however, is not quite the same as seeing it. For example, a picture of a button for "Log in" cannot be read by the screen reader, so a text tag that says "Log in" is associated with the picture.

Taking the lessons learned from individual projects in different lines of business and applying them to similar services is another way the Human Factors Group develops solutions for customers. For example, building on a thorough understanding of perceived picture quality for television, the Human Factors Group applies that same research to watching video on cell phones. Ultimately, the goal is to adapt technology to people, rather than force people to adapt to the technology.

### Enhancing Web Site Accessibility

The Web Accessibility Program conducts testing and reviews, retrofitting, accessibility training, and is also building relationships inside and outside AT&T. The Web Accessibility Team works closely with Creative Experience Team personnel, including Design Standards, Customer Insight & Usability Engineering, Design, Content, Rich Media, Interaction Architecture, and Motion, as well as other internal and external media and accessibility consulting organizations.

The Web Accessibility Team utilizes a two-part testing process of scanning for machine-detectable accessibility errors on the page, and human review. Using specialized software, the team filters through thousands of web pages each week, looking for accessibility issues. In addition, the program conducts time-intensive manual reviews of web page content, searching for hidden barriers to access for site visitors browsing with a disability. The team uses the results of automated testing to focus a human reviewer's intervention. The program's site retrofitting efforts have led to significant decreases in machine-detectable errors. To prevent accessibility errors from making it onto the web in the first place, the team provides accessibility training to the various disciplines involved in the web production process.

The WGBH National Center for Accessible Media in Boston and AT&T have worked together to develop a program that enables AT&T to provide captioning for online video produced and hosted through att.com. The captioning program is an example of how a corporate production process can adapt principles of accessible design to reach a wider audience, as well as give existing customers an enhanced user experience. Providing captioning enables rich media access for audiences who are deaf or have a hearing loss. It also adds utility for our mainstream users in noisy environments, for those whose primary language is not English, or for those who simply enjoy reading along with the audio turned off.

### Universal Design at AT&T

"Universal Design" is at the center of AT&T's strategy to ensure that new communications products and services are accessible to and usable by customers with disabilities. Universal Design is the practice of designing products, services and applications that are usable by the broadest possible range of consumers in the widest possible array of circumstances, including when physical, cognitive or sensory access to the handset or device is limited. Whether the limitation is short-term or long-term or related to vision, hearing, speech, cognition or dexterity, mobile products and applications need to be designed to enhance accessibility and usability.

### Experiencing Accessibility

Try sending a text message from a dark room, listening to a voice mail message during a loud concert, or answering the phone with a grocery bag in each hand. These are some of the situations providing some experience, however temporary, of what it is like to be in a situation of sensorial or physical limitation.



"Integration of Universal Design into business practice is fundamental to our mission of equitable access to wireless technologies for persons of all ages and abilities."

**Jim Mueller**, Project Director, User-Centered Research, Rehabilitation Engineering Research Center for Wireless Technologies, Georgia Institute of Technology



Apps4Access ADA 20th anniversary celebration event: Sam Fabens, VOX Global.

Because of its commitment to Universal Design and its collaborations with handset and software vendors to develop new products and services [www.att.com/gen/general?pid=10471](http://www.att.com/gen/general?pid=10471), AT&T has urged its suppliers to consider applying a Universal Design methodology as they develop wireless products and applications, as well as to take into consideration the needs of aging adults and customers living with disabilities. In March 2008, the company made its Universal Design methodology available to suppliers and third-party developers in order to further facilitate collaborations and joint developments of innovative solutions for improved accessibility on a variety of platforms. The original document describing AT&T's Universal Design methodology explained the benefits of Universal Design. It also provided several scenarios to further illustrate the relevance of this approach in the context of mobile handset and software design. For example, to meet the needs of someone who may have difficulty hearing, the document advised manufacturers to consider text and picture messaging, vibration and light-emitting diodes displays in their design to alert the user to a call. In the case of someone who may have limited dexterity, the document suggested such features as speech recognition and voice commands.

As part of this collaborative process, AT&T also encourages its suppliers to submit a Voluntary Product Accessibility Template (VPAT), a checklist designed to gauge how easy it will be for aging adults and those with disabilities to use the product. For example, it would indicate that icons include additional descriptions so that screen readers can "read" these descriptions aloud. It also guides suppliers not to rely too heavily on visual representations for the main functionalities of a device. It also recommends specific icons that are non-textual so that users unable to read can understand them, and reminds suppliers to consider the needs of customers who are color-blind.

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"It is our goal that the concept of 'design for all' is not viewed as a constraint but as a catalyst for innovation across the industry. We believe that, by making our methodology on Universal Design available for all to see, we can show the importance and value of creating wireless products and services that are usable and beneficial to as many persons as possible. The end result will be more choices for more consumers."

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**Carlton Hill**, Vice President of Marketing, AT&T

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"TDI commends AT&T for the announcement on its Universal Design principles. AT&T fully understands the benefits and impact it brings to the needs of persons with disabilities and their contacts upon its addressing and conforming to these principles. AT&T understands that in order to make its products and services accessible and usable to both persons with disabilities and those without disabilities, it is promoting a climate of full inclusion and integration for all Americans in the community, as well as in the business market. TDI salutes AT&T for taking this special initiative, and calls on other companies and businesses to emulate this noble approach to ensuring one's first-class pursuits of life, security and happiness in the community."

---

**Claude Stout**, Executive Director, Telecommunications for the Deaf and  
Individuals Living with a Hearing Loss, Inc.



# How a Culture of Inclusion and Sustainability Supports Accessibility

While Universal Design methodologies provide a solid foundation for the company's product and services accessibility efforts, its culture of inclusion and management processes involving persons with disabilities deserves much credit for its accomplishments. Three processes help the company stay focused on accessibility and aware of accessibility challenges and opportunities:

- The AT&T Advisory Panel on Access & Aging (AAPAA)
- The Citizenship & Sustainability Expert Team – Access and Aging
- Developing an employee base that includes persons with disabilities

Each is a unique source of continuous innovations and refinements to serve customers and employees with disabilities.

## AT&T Advisory Panel on Access & Aging (AAPAA)

The process of seeking input from representatives of the disability and aging adults communities is not new at AT&T; it engaged with both communities beginning in the 1980s. Input has taken several forms, including the former Wireless Access Task Force (WATF), mystery shopping with the assistance of community-based organizations, focus groups on a variety of topics and inviting constituency expertise. Today, AT&T's Advisory Panel on Access & Aging (AAPAA) meets three times a year with key decision makers from the company's major business divisions and provides recommendations on issues impacting customers and employees: emerging accessible and usable technologies, current products and services, customer service, strategic marketing and employment issues.

More than a decade ago, what is now AT&T Mobility created WATF, which was in charge of assessing the needs of customers with disabilities. The WATF panel, composed of representatives from consumer groups and advocates for aging adults and persons with disabilities, met twice per year with company officials to articulate their opinions, provide feedback and to learn about the wireless business. Members also had the opportunity to meet with handset manufacturers. WATF helped the company develop a range of accessible and usable products and services, including TTY and hearing-aid compatible handsets, network-based voice dialing, and a range of devices that can be used by persons with little or no vision. While the Wireless Access Task Force held its last meeting in September 2007, the knowledge and expertise developed in the past decade continue through its members who serve on the AAPAA.



AAPAA meeting, February 2010.

“Our progress in these areas is made possible by the tireless efforts and passion of our employees and by the support and guidance of our external stakeholders like the members of the AAPAA. We will continue to listen and cultivate those collaborations, as they challenge us to improve the way we run our business.”

Charlene Lake, Sr. Vice President, Public Affairs,  
and Chief Sustainability Officer, AT&T

A more recent example of this collaboration resulted in the development of a stylus to be utilized by customers for capacitive touch-screen devices in 2010. AAPAA members provided feedback on the rise of the smart phone market with touch-screen devices and how these products impact customers with disabilities. Within a few months, the company was able to source a stylus to be utilized on all capacitive touch-screen devices and have it on the market at a competitive price. In fact, AT&T introduced the stylus at the next AAPAA meeting in the summer of 2010.



The stylus suggested by the AAPAA.

#### Citizenship & Sustainability Expert Team Access and Aging

While the AAPAA is charged with seeking input from the disability and aging adult communities and related market segments, the Citizenship & Sustainability Expert Team on Access and Aging is composed of employees and other representatives whose role is to champion the cause of accessibility across all business divisions of the organization. This is particularly important to ensuring that accessibility is taken into account in all aspects of new product and service deployments, customer management, and internal employment policies and recruitment practices.

As Roman Smith, AT&T's Director of Public Affairs for Corporate Citizenship & Sustainability, explains: “AT&T strives to keep all members of the communities that it services connected with their world, including those who have communications difficulties and disabilities. Through its Citizenship & Sustainability Expert Team on Access and Aging, the company brings together constituents who drive the most important accessibility initiatives. Corporate sustainability is woven into the fabric of the way the company does business. Our view of sustainability is broad. It includes environmental stewardship, as well as encompasses a wide variety of issues the company believes are integral to be a good corporate citizen — fostering an inclusive workplace and offering customers with disabilities products and services that support them to live more sustainable and independent lives.”

The Expert Team on Access and Aging has been particularly effective in supporting awareness and competency training programs on disability and accessibility issues for hundreds of thousands of employees in all divisions of the company, providing inter-divisional briefings on innovative products and services and helping define and coordinate process adjustments for customers.



## Recruiting and Career Advancements for Persons with Disabilities

Employees with disabilities help a company make the best informed decisions on accessibility and customer service for persons with disabilities. How better to reflect potential customers than through the societal realities of a diverse workforce that includes persons with multiple mixes of abilities? With these principles in mind, AT&T has implemented several programs over the years to promote the recruitment of persons with disabilities and workplace accommodations, including alliances with Career Opportunities for Students with Disabilities (COSD); The Washington Center, an initiative with historically black colleges and universities supporting work with students with disabilities; and a new customer care program staffed entirely by U.S. military veterans with disabilities. This latest pilot was launched in Atlanta in November 2010 with a goal of employing approximately 60 veterans with disabilities by March 2011. The veterans serve as front line customer service representatives, as well as in supervisory, operational and support functions.

AT&T has also invested in career development for managers with disabilities as a co-founder of the UCLA Anderson School of Management's Leadership Institute for Managers with Disabilities. So far, five AT&T directors and managers have completed the course. For its disability-inclusive diversity leadership in the workforce, AT&T was recognized by the U.S. Department of Labor's Office of Disability Employment Policy (ODEP).

To improve the working environment for its new recruits and employees with disabilities, the company's Integrated Disability Service Center helps them maintain regular work commitments when they are faced with situations that may affect their ability to perform essential job functions. A well-established job accommodation process allows employees to request temporary or permanent work restrictions, obtain appropriate accommodations to assist them in performing their job responsibilities, or be considered for temporary work assignments as needed. Since 1993, the "Individuals with Disabilities Enabling Advocacy Link" (IDEAL), one of 10 company-recognized Employee Resource Groups, has also served as a resource for employees with disabilities. Members of IDEAL deliver presentations on disability etiquette and other aspects of the employment experience as part of National Disability Employment Awareness month each October. IDEAL also provides employees with disabilities the opportunity for mentoring, networking and leadership development which directly supports the company's overall diversity and inclusion objectives. In 2010, AT&T ranked #3 in DiversityInc's Top 50 Companies for Diversity.



Career Opportunities for Students with Disabilities (COSD) Executive Director, Alan Muir, and Jim Skurka (AT&T Business Solutions).



Jim Skurka (AT&T Business Solutions) presenting at a COSD Student Summit.

## Workplace Accessibility

As Dr. Aaron Bangor explained to [diversitycareers.com](http://diversitycareers.com), when he was five years old, he experienced juvenile rheumatoid arthritis that caused cataracts, leaving him legally blind. To assist in his work as part of the Human Factors Group at AT&T, Dr. Bangor uses Microsoft Windows to enlarge text and display it as white on a black background so he can read it more easily. He also uses a closed-circuit TV and camera that can send images to a screen, images he can then enlarge. Dr. Bangor ardently believes that technology should be designed around the needs of the user, regardless of their abilities.



**Data Point: Consumer Attitudes Toward Companies that Hire Persons with Disabilities**

A National Survey conducted in 2005 on sample of 806 consumers by Gary N. Sipersteina, Neil Romanob, Amanda Mohlera and Robin Parkera, University of Massachusetts, Boston, MA, USA and the America's Strength Foundation, Ellicott City, MD, USA.

Most of the participants (75 percent) had direct experience with persons with disabilities in a work environment. Moreover, these experiences were positive. All participants responded positively towards companies that are socially responsible, including 92 percent of consumers who felt more favorable toward those that hire individuals with disabilities. The participants also had strong positive beliefs about the value and benefits of hiring people with disabilities, with 87 percent specifically agreeing that they would prefer to give their business to companies that hire individuals with disabilities. [www.worksupport.com/resources/viewContent.cfm/637](http://www.worksupport.com/resources/viewContent.cfm/637)

**Accessibility and Sustainability: Q & A with Roman Smith, Director – Public Affairs, Corporate Citizenship & Sustainability, AT&T**

For Roman Smith, Director – Public Affairs, Corporate Citizenship & Sustainability, sustainability is more than just an environmental principle. It is at the core of a company's corporate citizenship, particularly its commitment to the disability and aging adults communities.

**How does AT&T define sustainability?**

Sustainability is a way of doing business that recognizes our company's impact on society, as well as the impact that social issues have on our business. Our citizenship and sustainability efforts target areas where the needs of our company intersect with the needs of our communities. There are certainly many needs of society; however, at AT&T, we focus on the issues that are important to our business and communities and that provide us with an opportunity to make the most meaningful impact on areas such as accessibility, education and diversity.

**How do you approach sustainability?**

I approach sustainability as an "operating principle" of how we run our business. Sustainability is not a token program or marketing effort at AT&T, but a commitment to operate better, smarter, and in a way that makes sense for both our company and our world.

**Is sustainability just about the environment?**

No. While sustainability at AT&T does include environmental stewardship, it also encompasses a wide variety of issues that we believe are central to our responsibilities as a corporate citizen. Examples include making our communities stronger through volunteer opportunities such as job shadowing, fostering an inclusive workplace, supporting the National Disability Institute's Real Economic Impact Tour to help low-income persons with disabilities and their families gain financial literacy skills, protecting the environment by consuming less energy, and offering products and services to help our customers live more independent and sustainable lives.

**What does sustainability mean personally?**

At a personal level, sustainability is about choosing actions that create a positive and a sustainable future for myself, my community and my company.



### Alexander Graham Bell – An Accessibility Pioneer

Alexander Graham Bell, the inventor of the telephone and the founder of the company that would become AT&T, was a teacher of deaf people. His father, grandfather and brother all studied elocution and speech, and both his mother and his wife were deaf. All of this exerted a profound influence on Bell. In fact, Bell's invention of the telephone in 1876 grew out of his efforts to develop the first hearing aid.

### Early Accessibility Milestones

#### 1922

Dr. Harvey Fletcher and R. E. Wegel of the Bell System, in cooperation with Dr. E. P. Fowler, a New York City ear and throat specialist, announce their experiments in the measurement of hearing. From their work, Bell Laboratories eventually developed the 1A and 2A audiometers for physicians to use in aiding deaf patients.

#### 1924

Western Electric develops the artificial larynx for those who have lost their voices through surgical removal or paralysis of the vocal cords.

#### 1925

AT&T produces its first telephone amplifier, the model 23A.

#### 1931

AT&T introduces the Telex switched typewriter service.

#### 1947

Bell Labs invents the transistor, which allows significant reduction in the size and weight of hearing aids. Bell Labs subsequently provides hearing-aid manufacturers with royalty-free licenses.

### Accessibility Innovation: A Continuous Process

Today, AT&T Labs continue working on innovation, developing core technologies for advanced solutions to meet the needs of persons with disabilities and those without disabilities. For example WATSON, AT&T's speech and language engine, integrates a variety of speech technologies, including network-based, speaker-independent automatic speech recognition (ASR), Natural Voices text-to-speech conversion, natural language understanding (which includes machine learning), and dialog management.

WATSON has been used within AT&T for interactive voice response (IVR) customers for over 20 years during which time its algorithms and tools have been refined to improve accuracy, convenience and integration. WATSON has also been used for speech analytics, mobile voice search of multimedia data, video search, voice remote, voice mail to text, web search and SMS, with multiple web-based applications under development.



AT&T's Chris Boyer (Public Policy) presenting at Lights! Camera! Access! ADA event with the U.S. Department of Labor and Academy of Television Arts & Sciences. Photo: Christopher Voelker.



AT&T's Aaron Bangor (AT&T Labs) and Doug Burasco (Relay), attending UCLA Leadership Institute for Managers with Disabilities. Photo: UCLA Anderson School of Management.



AT&T's Susan Mazrui (Global Public Policy), first from left, attending UCLA Anderson Leadership Institute for Managers with Disabilities, along with other corporate executives. Photo: UCLA Anderson School of Management.



**Pioneering Speech Synthesis - An Interview with Jay Wilpon and Amanda Stent, AT&T Labs - Research**

Research on speech synthesis started in the 1930s and an early demonstration of a voice synthesizer was made at the 1939 World's Fair in New York City. Speech recognition research started in the 1950s in the early electronics research group at Bell Labs. However, it was not before the early 1970s that computers became advanced enough to develop speech recognition for commercial applications. The main purpose at that time was to automate services so that customers could access a variety of information and services without always having to go through an operator. This, in turn, allowed companies such as AT&T to scale up services.

It all started with "yes/no" choices, one word at a time. Recognizing natural conversation has always been the ultimate goal and, as higher performance computers became available, research began a push in this direction. In the early days, disability and accessibility were not really the purpose. For example, in 1979, the company started a research program to voice-activate call dial functions. At the time this was a real stretch for speech recognition technologies, and yet it was successful and patented by AT&T. This was 25 years before voice dialing became a mainstream application in telephony, especially on mobile phones.

Recognizing everyone's speech no matter what they said, however, remained the key objective R&D teams were pursuing. In the 1970s the issue was that if a model had to be built for each person, hundreds of millions of models would be needed. Obviously, this was impractical for broad use in the marketplace. Speech recognition, to be viable, has to be speaker-independent. AT&T's team invented algorithms to make speech recognition speaker independent. The company filed over 500 patents and thousands of papers. The team, led by Jim Flanagan and Larry Rabiner, fathers of many signal processing inventions at AT&T, contributed seminal concepts to this new scientific discipline. Over the years, many members of the team have been honored with fellowships in the IEEE, the National Academy of Sciences and the National Academy of Engineering. The team has laid out all the fundamental solutions to produce and recognize speech. The artificial larynx for persons with voice impairments was developed from the same fundamental technology out of the same group.

The notion that those technologies could benefit persons with disabilities gained momentum in the 1980s. The first application was a text-to-speech component for a dual-party relay solution using Telecommunications Devices for the Deaf (TDD). In TDD, a sentence is typed in by the caller at one end and sent to the operator who reads it back to the caller at the other end. With a speech synthesizer in the middle of the transaction, after the caller typed in the sentence, the speech synthesizer would read the text instead of the operator. This allowed increasing the speed and efficiency of relay services. It was first deployed in Washington State in 1984.

Using those leading technologies to address the needs of persons with disabilities gained further momentum as awareness and interest for assistive technologies grew in the general public. As a result, the AT&T Speech Research Group became more involved with numerous initiatives to develop solutions for persons with disabilities, from telecommunications to computer human interfaces. Some of its technologies were used by third parties developing new solutions, for example evaluating the emotional stability of autistic children. Over the past ten years a multimedia research group at AT&T has also applied speech recognition and language processing to the problem of automatic captioning and segmentation of multimedia videos.

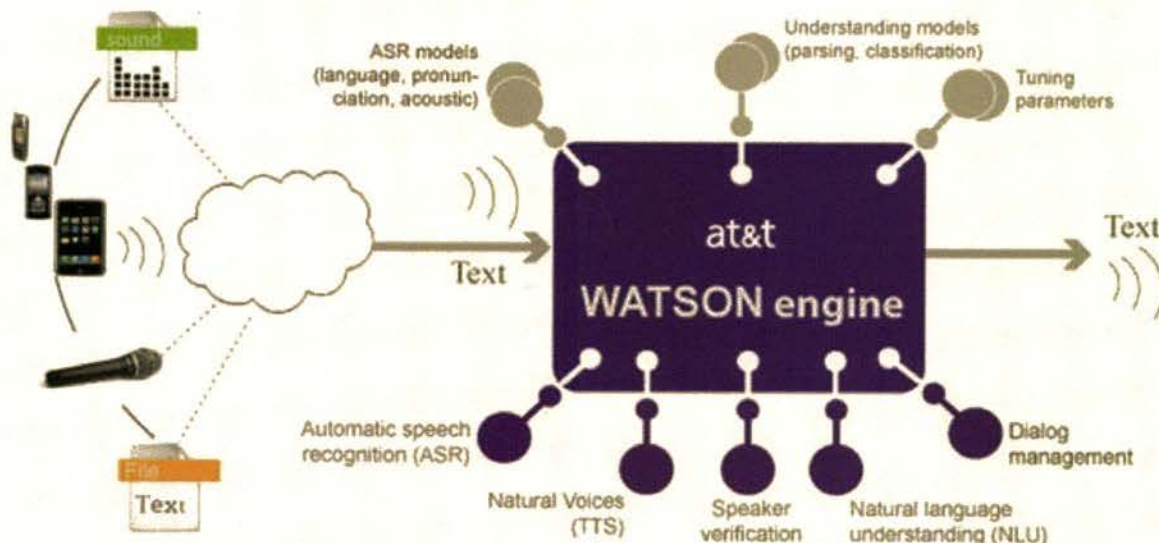


cont.

While text-to-speech and speech recognition can help build very valuable applications for persons with disabilities, the assistive technologies market may be perceived as too small to justify investments in applications based on those technologies. AT&T Labs made a bold move in 2007 by evaluating offering its technology as a web-service with the ability for application developers to "mash it up" with other applications such as e-book readers and voice-enabled directions. When voice recognition was made available as a service 'in the cloud', the number of applications using it grew very rapidly. The company uses a business model that is free to use up to a limit and then costs users pennies after 1,000 or so licenses. Today, hundreds of organizations use AT&T speech technologies through its speech mashup prototype. Its customer base grew via word of mouth and includes a large variety of organizations from little Mom & Pop shops to universities to major enterprises across the world. Currently, AT&T is in the process of productizing "speech as a service" for broad market use and expects a robust offer by mid-2011.

Looking at recent trends, some of the promising areas for voice technologies include closed captioning of multimedia, accessible navigation services, assisted virtual remote console using mobile devices, searching the web, searching and browsing through music or video libraries or TV, e-readers available on the web as an application with an option to search, change speed, etc. All the while, scientists at AT&T Labs continue to push the scientific frontiers of speech research to better improve the recognition, synthesis and understanding of the spoken and written word.

One trend is certain: Mainstream assistive products and services will be more and more cloud-based rather than device-based. Cloud-based applications are easier to maintain and upgrade. As cloud-based applications multiply, the ability to build at greater scale will contribute to lower costs, to the benefit of both application developers and persons with disabilities.



AT&amp;T WATSON Speech Technologies.



## A New Frontier for Accessible and Assistive Mobile Phones

### From Blueprint to Market: Accessibility in a Product Life Cycle

The product development cycle of a new handset follows a well-defined methodology incorporating accessible and assistive features at an early stage of design while allowing developers to check their usability as the product takes shape and is finally marketed. The launch of the Pantech BreZE, one of AT&T's most popular handsets among persons with disabilities and aging adults, is a good example.

In 2007, AAPAA provided feedback indicating the need for a handset that would be easy to use for aging adults and persons of all ages. AAPAA recommended that such a handset should incorporate assistive features for persons with low vision, dexterity limitations or hearing loss and those needing simplified commands for frequent tasks. However, the Panel also suggested that such a product should look similar to mainstream handsets and be as stylish as any regular model. With this input, the User Experience Design Team developed a list of specifications and searched for a handset vendor capable of meeting those specifications. It selected Pantech, a South Korean company, with whom it developed a collaborative work process in order to design the new handset with the desired features.

During the first phase, the AT&T team briefed the Pantech team about accessibility guidelines, market segments, form factors, ergonomic features, display menus, text menus, text-to-speech software and voice output. The Pantech development team worked for approximately one year on developing the first prototypes. During this development stage, the AT&T team provided feedback to the Pantech team by testing the first sketches of menu flows and screen shots with third-party research services and user experience groups. This iterative process allowed Pantech to adjust both software and hardware design while developing the first prototypes.

Once available, the prototypes went through the standard rigorous lab quality control process that precedes any new product launch, typically 12 weeks (not including user testing). Once approved, market launch occurred four weeks later. Meanwhile, specific attention was given to make the supporting documentation for the phone accessible using large fonts, and going through the regular process of developing support tools for the customer service representatives handling calls from aging adults and persons with disabilities.

When the Pantech BreZE was launched, its unique features marked a step forward in intuitive mobile phone design. Besides its sleek and simple appearance, it offered an extra-large color display, a simple user interface to access its various features, lighted EZ One-Touch Quick Call keys, Bluetooth, magnifier, hearing aid compatibility and voice dialing. Product testing showed that most of the desired outcomes were being met.

As with any product, however, the company carefully collected user feedback and tracked issues. It does so through customer service and twice a year via a systematic review by its lab of all its phones, using several hundred data points including an entire section of questions on accessibility. The initial Pantech BreZE review led to a first iteration of suggested improvements: its documentation accessibility, for example, was further improved as well as its form factor for messaging. Also, keys were renamed (the "send" key was relabeled "call"). Future reviews will likely lead to incorporation of additional features as needed.



The success the Pantech BreZE has enjoyed since its launch is no secret at AT&T. It gained quick market acceptance and recognition such as its inclusion in the list of Oprah Winfrey's holiday gifts for under \$100. In May 2010 the successor to the Pantech BreZE, the aptly named Pantech BreZE, 2 included many of the improvements identified in the product and customer reviews. Some of those improvements included improving the UI menus and font sizes for better readability, added voice command feature for improved accessibility to basic phone functions, added a large visual indicator for call, message and batter life status and upgraded the technology to 3G HSDPA over 2G EDGE.

### AT&T's Mobile Accessibility and Assistive Technologies at a Glance

As mobile devices and services expanded, AT&T systematically developed and introduced accessibility and assistive features in cooperation with a variety of third parties. Key features which significantly enhanced the usability of mobile phones by persons with disabilities and aging adults include:

- **Audible prompts** to assist persons with low vision. AT&T was the first major wireless carrier to offer screen-reading software, which makes handsets accessible to persons who are blind via voice output. This software reads basic handset functions aloud, such as battery life and network strength, as well as Caller ID, the calendar, text messages and e-mail.



#### The Pantech BreZE II

- Large Buttons and Display Text
- EZ One-Touch Quick Call Keys
- Email, Text, and Instant Messaging
- MEdia™ Net
- Bluetooth® Capable
- Voicemail
- Camera and Video Capabilities
- Hearing Aid Compatible

- **Voice input and voice output** for many of the handset functions such as key echo or dialing from a contact list, or for handsets that speak aloud each dialed number.
- **Mobile Speak by Code Factory:** Mobile Speak allows a user to have access to all elements of a mobile phone screen and functions and can enable customers with qualifying disabilities to read books in a specialized format (such as DAISY) designed for persons who are blind or have reading impairments.
- **Mobile Magnifier by Code Factory** enlarges the font size on the screen of the phone.
- Voice command software that allows customers to use verbal commands to dial a number or retrieve information such as the date and time.
- **TTY-Compatible Phones:** AT&T supports phones that are teletypewriter (TTY) compatible. The TTY device enables visual communication via a one-line or two-line electronic display between two users both equipped with TTY devices. When used in combination with a TTY-compatible wireless phone, customers with speech or hearing disabilities can stay in touch while on the go. TTY-compatible wireless phones have a 2.5mm port that accommodates the 2.5mm audio jack connector on the TTY device.
- **Hearing Aid Compatibility:** AT&T works closely with handset vendors to improve the user experience of customers who have hearing aids. Pursuant to FCC guidelines, handsets are tested and rated for Hearing Aid Compatibility (HAC). These HAC ratings, or "M-Ratings" and "T-Ratings," help hearing aid users find the best phone for them.

Persons with disabilities are often early adopters of accessible technologies that migrate into crossover mainstream audiences. Those features and services that are developed to support customers with disabilities end up being useful to all customers. A vibrating phone helps persons with a hearing loss, but it also allows a user who can hear to avoid embarrassing interruptions during a business meeting. The talking Caller ID device is essential for users with vision loss, but it also comes in handy for a sighted person who doesn't want to leave the dinner table to check who is calling. User-selected ringtones are fun but can also be set to indicate specific callers and can help a person who does not want to take every call or wants to set a ringtone that is easier to hear because hearing loss may be more significant in certain frequencies.

# Making Customer Service Work for Persons with Disabilities and Aging Adults

Similar to product design, customer service for persons with disabilities and aging adults is organized along the principle of Universal Design, so that it may be available to the broadest possible range of consumers in the widest possible array of circumstances, including those when physical or sensory access is limited. Differences among customers, however, are not just due to disability or functional limitation; they may simply be a preference for how a customer wants to do business. If they have a question about their service, they can call for assistance. However, many customers would rather use a web site, conduct a chat session with a representative, or even visit one of AT&T's retail stores to have their question answered. This variety meets the preferences of a larger number of customers, but it also gives flexibility to a customer with a disability for how they choose to interact with the company.

## Communications and Points of Sale

Communications with aging adults and persons living with disabilities include web sites, company-owned points of sale, and targeted advertising campaigns that explain the benefits of accessibility and assistive features for different types of customer situations.

The company developed a dedicated web site to help wireless [www.wireless.att.com/disabilityresources](http://www.wireless.att.com/disabilityresources) customers with disabilities identify products and services that may better address accessibility needs. It includes comprehensive disability resources and information on products such as Mobile Speak & Mobile Magnifier, HAC devices, AT&T 411 Info, 711 TRS Access, Video Relay, TTY compatible telephones and TTY compatible devices, and Text Accessibility Plan (TAP). Customers have the option to call a voice or TTY number displayed on each web page to ask for more information.



The AT&T accessibility web page.



The company also uses targeted advertising campaigns emphasizing how accessibility features of its phones may benefit persons with disabilities or aging adults. In doing so, it uses efforts to enhance the usability of advertising messages for persons with disabilities. Since June 2007, for example, nearly all of its television commercials have been close captioned. The company runs ads in appropriate publications tailored to persons with disabilities such as "Diversity Careers in Engineering and Information Technology" or regional editions of the AARP magazine. It also uses StarLines, a state-specific insert which is sent with telephone bills to 11.4 million residential customers in nine southeastern states (including a Spanish version in Florida), dedicated to customers with disabilities and their families. The insert includes information on AT&T's products and services for customers with disabilities. Other customers are reached via direct mail campaigns, requesting that they contact company representatives at the National Center for Customers with Disabilities (NCCD), a toll-free number if they, or someone they know, has a disability.

For its points of sale, the company has deployed Section 255 of the Telecommunications Act and Hearing Aid Compatibility (HAC) training for all its U.S. stores in order to ensure that sales personnel are well-versed in HAC programs and protocols as well as provided with basic information about the Americans with Disabilities Act (ADA). Every other month, the company conducts audits of all its retail stores to ensure that it meets the legislation's requirements to serve aging adult customers and those with disabilities.

### Customized Services for Persons with Disabilities

Beyond accessible and assistive solutions offered on handsets, customized services were created and marketed to customers with disabilities that meet their specific requirements:

- Video Relay Services (VRS) connect individuals with an interpreter who translates between American Sign Language (ASL) and spoken English. Users can download a free VRS videophone software, Video Link. Video Link is only available for persons who are deaf or living with a hearing loss [www.att.com/vrs](http://www.att.com/vrs). An iPhone VRS application is also available in the iPhone App Store.



Video Relay Services (VRS) for deaf viewers on YouTube.

- Instant Message (IM) Relay [www.att.com/relay](http://www.att.com/relay) is a text-based solution for individuals who are deaf or have a speech or hearing loss and that has been ported on many mobile devices. Customers can also use an Internet connection and an AOL Instant Messenger (AIM) account. To relay with one-step dialing, users send the phone number they are calling via instant message to a screen name "ATTRelay." An AT&T Relay operator calls the phone number and translates the text to voice to the other party. There is no charge to use this service, but users must register. Aside from using IM relay on personal computers, IM relay is accessible on the many mobile platforms on which AOL is available such as iPhone, Android, iPad, Blackberry, and Windows Mobile. Customers can also get their own personal 10-digit phone number and people can call them via the IM Relay.
- AT&T 411 Info lets users dial 4-1-1 from their wireless phone for live directory information, send a text message with the listing and connect at no additional fee. AT&T 411 Info can also find a business near the user's location. It also offers movie showtimes, turn-by-turn driving directions, reverse lookup and business category search, all with access to live operators 24/7.
- Text Accessibility Plans (TAPs) were developed for persons who are deaf or have a speech disability and/or hearing loss and who use almost exclusively text messages rather than voice calls. Those data plans were designed with input from users via focus groups. Rates are more favorable than those of voice plans with similar text usage, and voice calls are charged by the unit if needed.



### The AT&T National Center for Customers with Disabilities

The National Center for Customers with Disabilities (NCCD) handles inquiries and requests relating to AT&T Mobility's products and services.

Based in Baton Rouge, LA, it includes customer care personnel who have received training on disability-related wireless products and services. In addition to training required for all customer service representatives and customer facing personnel, the NCCD staff members are trained to address the specific wireless product and service needs of aging adult customers and those with disabilities. The Center uses specialized channels (including TTY and e-mail) to help customers with disabilities who have accessibility and usability questions.

Customer service representatives are given specialized training on hearing aids, screen reader software, voice dialing, and TTY compatibility. They provide referrals for phone peripherals meeting customer needs. In addition, a list of customers using specialized programs such as Voice Dial, TAP Rate Plans and buyers of Mobile Speak & Mobile Magnifier software that have applied for a rebate is maintained, and representatives can arrange for alternate formats such as Braille or large print billing, as well as materials in alternate format when requested by the customer. Finally, for each product launch, a specific customer support knowledge base is made available to customer service representatives, product briefings are conducted, and sample phones are distributed.



*Operator serving a customer via TTY.*

One of the most impressive features of the NCCD is its ability to interface with the communication medium of choice of customers with disabilities. It may be a live text exchange, a mini-video relay call or a TTY call. All customer service representatives have been trained to handle any and all of those customer communication preferences. For Tier Two support requiring specific technical knowledge beyond the knowledge base used by AT&T's own customer service representatives, third parties are chosen who have both the required technical knowledge and the ability to interact with customers with disabilities in a similar fashion.

"AT&T has a long legacy of providing products and services designed to meet and exceed our customers' expectations and supporting the disability community. The goal of AT&T's care centers is to understand our customers' needs and preferences and help identify the best options available -- whether they have a disability or not."

**Jody Garcia**, Vice President, Consumer Sales and Service, AT&T





Point of Sale Accessibility.



Point of Sale Accessibility.

### A Brief History

It was 1978 when AT&T opened its first call center dedicated to serving the disability and aging adult markets. The center served wireline customers in California through voice and TTY access.

Today, centers located in Oakland, CA, Lees Summit, MO, and Albany, GA, are dedicated to serving the disability and aging markets, in English and Spanish, across AT&T's entire wireline footprint.

Employees are trained to assist and advise customers with hearing, vision, mobility and/or speech disabilities about equipment, accessories, features and calling plans, as well as choices for TV and wireless products and services. They can also arrange for an alternate billing format, such as Braille or large print.

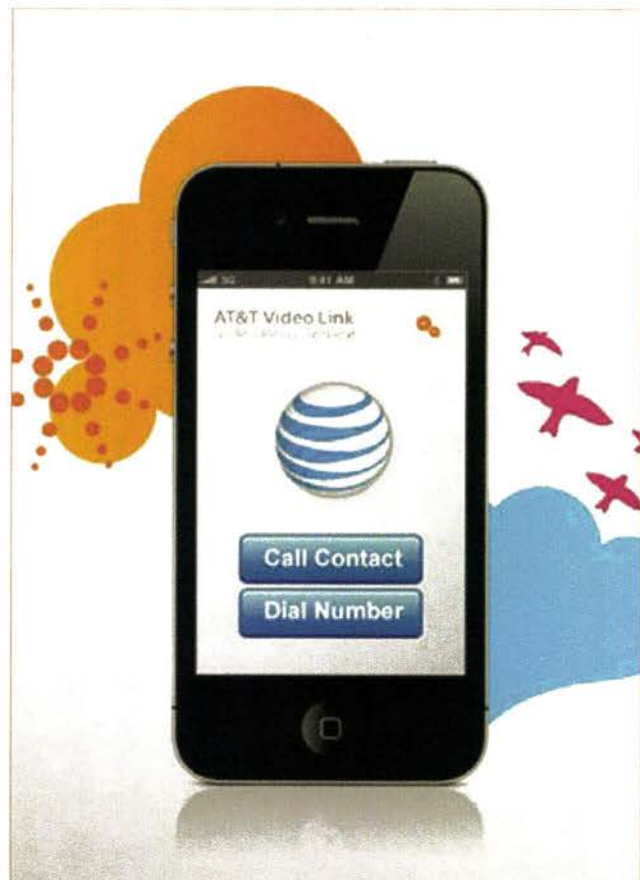
### Serving Persons with Disabilities: Involving All Employees

Serving persons with disabilities and aging adults, however, cannot be accomplished successfully in isolation. In 2009, the company embarked on an ambitious program to train employees on disability awareness. With input from AAPAA members, it designed a training module delivered as an instructor-led course or self-paced e-learning program lasting approximately 45 minutes. The training module covers definitions of disabilities and demographics, Section 255 of the Telecommunications Act, how to interact and communicate with persons with disabilities (including practical etiquette guidelines and communications techniques) and understand the requirements that they may have in relation to mobile phones and wireless services. More than 160,000 AT&T employees have completed the training program. When asked if all those efforts, in addition to meeting the company's sustainability objectives did translate in some form of competitive edge, the answer among AT&T executives has been "absolutely."

# Using Innovation for Accessibility: iPhone and Smart Phone Features for Persons with Disabilities

As technology evolves and third parties develop new hardware and software solutions, wireless service providers need to constantly assess how these may present challenges or opportunities for aging adults and customers with disabilities. AT&T does this through systematic advance briefings and exchanges with third parties providing handsets, middleware or applications, and by leveraging its own research and market surveys.

For example, the launch of smart phones has opened an entirely new chapter in the development of assistive solutions for persons with disabilities. Today, iPhone customers living with disabilities enjoy a vast array of breakthroughs in accessibility and usability [www.apple.com/accessibility/iphone/vision.html](http://www.apple.com/accessibility/iphone/vision.html). Some of the key features are standard on the iPhone, but many other are third-party applications that have proliferated since its launch.



AT&T Video Link app for iPhone 4 can be used to place video relay calls.



“When AT&T and Apple brought closed captioning to the iPhone, Universal Design met cutting-edge technology. Deaf and hard-of-hearing persons celebrated, and everyone who appreciates captioning benefited from this remarkable achievement.”

Larry Goldberg, Director, Carl and Ruth Shapiro Family National Center  
for Accessible Media at WGBH (NCAM)



AT&T Video Link user interface.

VoiceOver, which was originally a screen reader for the Mac, has been adapted by Apple for iPhone 3GS and comes standard on the iPhone 4. It allows users to operate the phone even if they cannot see the screen. VoiceOver reads aloud a description of each item touched by the finger of the user. It also reads aloud all critical indicators on the phone such as connectivity choices, battery level, signal level, screen orientation and whether the screen is locked or unlocked. As is the case for the Mac version, VoiceOver lets the user choose the speaking rate. It offers an innovative capability, the “Rotor.” Turning the rotor — by rotating two fingers on the screen as if you were turning an actual dial — changes the way VoiceOver moves through a document based on a setting you choose. VoiceOver also offers a Bluetooth-enabled Braille interface, which can be used both for output and input devices. Voice recognition can be activated by pressing and holding the home button to choose and play music or make a phone call.

Perhaps most intriguing and promising is the array of new applications that have been launched for persons with disabilities by third-party developers. For users with a hearing loss for example, TuneWiki enables the iPhone to display closed and open captioning similar to a TV set, a real breakthrough in accessibility for mobile platforms. Other programs offer additional resources, such as the iSign application to assist in learning American Sign Language or “A Special Phone,” an application allowing dialing a number by simply shaking the phone. For children with autism or developmental delays, several innovative applications have emerged demonstrating that the iPhone intuitive graphical user interface and ability to let the user manipulate pictures can boost non-verbal communications to a much higher level than traditional paper based methods.

The future looks bright for new types of communications for deaf and non-verbal users who converse in sign language.

## Conclusion

This review of AT&T's internal processes to address the market of persons with disabilities and aging adults provided G3ict with important insights on four key success factors that may be replicated in a number of industries or services:

- First, AT&T leadership sees the benefits of the link between innovation and opportunity as it applies to the communication needs of people with disabilities and aging adults.
- Second, it was clear during our data collection and interviews that the culture of inclusiveness and commitment to sustainability were the foundation of its achievements; it permeates all areas of the company, allows accessibility advocates to have their voice heard in product development, marketing and services and facilitates the involvement of persons with disabilities at all levels of the decision making process. AT&T's training investment on disability awareness is considerable, enhancing its entire workforce effectiveness in interacting with customers and colleagues with disabilities and aging adults.
- Third, the incorporation of accessibility criteria at an early stage of development of all products and services has become an integral part of the company's way of doing things. It is not a process forced on the product development teams but a philosophy that permeates their product development methodology and that of their suppliers. In that regard, the company's Universal Design public guidelines for suppliers constitute an innovative step rarely seen in any industry.
- Fourth, the systematic research conducted on human factors and on the needs of persons with disabilities and aging adults with a good understanding of market demographics via customer research or direct input from various advisory councils enables the company to develop integrated, sustainable and consistent strategies. Those include all stages of a product life cycle from product design to marketing, communications, points of sale and customer services. Such an integrated strategy is essential to reach out to new customers, managing sales and offering dedicated customer services trained to handle the specific needs of persons with disabilities and aging adults.

As for the future of accessible and assistive mobile products and services, this review of AT&T's accessibility strategies points to a sea change in how new technology and solutions will evolve. Most remarkable, in our opinion, is the fact that the best solutions are increasingly the result of cooperation involving multiple players: hardware manufacturers, operating system vendors, application developers, service providers, experts with disabilities. The emergence of smart phones with unifying trends such as the use of HTML 5 among developers opens an unprecedented opportunity for the creation of specific applications addressing the many specialized needs and preferences of persons with disabilities and aging adults.





*AT&T's Elizabeth Dixon (Human Resources) sharing her experience in promoting inclusion among the AT&T work force at the U.S. Department of Labor/ODEP Listening Tour in Boston, March 2010.*

Ultimately, however, technology solutions for persons with disabilities and aging adults will always require dedicated and appropriate customer support and services. With hundreds of new applications appearing on platforms such as the iPhone, Android and other major operating systems, the next challenge will be for service providers to develop new processes and business models that are sustainable and work for customers in this complex environment. Companies such as AT&T, which have adopted Universal Design principles, rely on the ongoing input of persons with disabilities and aging adults, and invest heavily in nurturing a culture of inclusion among their workforce, will be well-positioned to successfully tackle these challenges for generations to come.



Global Initiative for Inclusive Information  
and Communication Technologies

[www.g3ict.org](http://www.g3ict.org)

1110 W. Peachtree Street, NW  
Atlanta, GA 30309-3609 – U.S.A.



# Exhibit H

# BVoIP Bill





XYZ COMPANY  
PO BOX 555  
CITY, ST 99999-1234

|                |                  |
|----------------|------------------|
| Page           | 1 of 2           |
| Account Number | 831 000-1111 111 |
| Billing Date   | Jan 19, 2014     |
| Questions?     | 1 800 235-7524   |
| Web Site:      | <b>att.com</b>   |

Invoice 1234567890

# Invoice

### Bill-At-A-Glance

|                         |                    |
|-------------------------|--------------------|
| Previous Bill           | XX                 |
| Payment                 | XX                 |
| Adjustments             | XX                 |
| Balance                 | XX                 |
| Current Charges         | XX,XXX.XX          |
| <b>Total Amount Due</b> | <b>\$XX,XXX.XX</b> |
| Payment Due Date        | Feb 18, 2014       |

### Billing Summary

For detailed information of your charges go to  
[www.businessdirect.att.com](http://www.businessdirect.att.com)  
Questions? Call: 1 800 235-7524

**AT&T Business Services**

|                               |           |
|-------------------------------|-----------|
| Group #000001                 |           |
| Sub-Account #831-000-0000 001 | X,XXX.XX  |
| Sub-Account #831-000-0000 002 | X,XXX.XX  |
| Total Group #000001           | XX,XXX.XX |

|                       |           |
|-----------------------|-----------|
| Total Current Charges | XX.XXX.XX |
|-----------------------|-----------|

### Current Charges

Group #9999991  
Sub-Account #E31-000-0000 001  
Charges for Subscriber/Router ID 9999999999  
USTESTATLST05R  
2100 LAKE BLVD  
CITY, ST 00000  
Voice Over IP  
Recurring Charges:  
Jan 19, 2014 thru Feb 18, 2014  
1. AT&T Voice DNA(R) - Premium Feature XJXXX  
Package  
Qty: 200.00 Items at XXXX  
Gross: XXJXXX  
VoiceDNA Package - Premium Discount XJXXXXXCR

## Group #000001 - Continued

| Recurring Charges:             |  |          |
|--------------------------------|--|----------|
| Jan 19, 2014 thru Feb 18, 2014 |  |          |
| 2                              | Call Distribution Module                   | XXX.XX   |
|                                | Qty: 20.00 Items at XXX.XX                 |          |
|                                | Gross: X,XXX.XX                            |          |
|                                | Call Distribution Module Discount XXX.XXCR |          |
| 3                              | Conferencing                               | XX.XX    |
|                                | Qty: 20.00 Items at XXX.XX                 |          |
|                                | Gross: XXX.XX                              |          |
|                                | Conferencing Discount XXX.XXCR             |          |
| One Time Charges:              |  |          |
| 4                              | AT&T Voice DNA(R) Int'l OffNet             | X.XX     |
|                                | Qty: 25.00 Items                           |          |
|                                | International Off-Net Discount X.XXCR      |          |
| Total Voice Over IP            |  | X,XXX.XX |

### Surcharges and Other Fees

|    |  |        |
|----|--|--------|
| 5  | Universal Connectivity Charge - Interstate | XXX.XX |
| 6  | Administrative Expense Fee - Interstate    | XX.XX  |
| 7  | Property Tax Allotment - Interstate        | XXX.XX |
| 8  | Federal Regulatory Fee - Interstate        | XXX.XX |
| 9  | STATE COST - RECOVERY FEE                  | XX.XX  |
| 10 | STATE COST - RECOVERY FEE                  | XXX.XX |
|    | Total Surcharges and Other Fees            | XXX.XX |

## Taxes

|                                       |          |
|---------------------------------------|----------|
| Federal:                              |          |
| 11. FEDERAL TAXES                     | XX.XX    |
| State:                                |          |
| 12. ST/STATE                          | XXX.XX   |
| 13. ST/9-1-1 EQUALIZATION FEE         | XX.XX    |
| County:                               |          |
| 14. ST/LOCAL 911 CHARGE               | XXX.XX   |
| Total Taxes                           | XXX.XX   |
| Total Subscriber/Router ID 9999999999 | X.XXX.XX |
| Total Sub-Account #E31-009-0000 001   | X.XXX.XX |

Sub-Account #831-000-0000 002  
Charges for Subscriber/Router ID 999999991  
UNTESTED

USTESTATSLT05R  
 100 PARK AVE  
 CITY, ST 00000  
 Voice Over IP  
 Recurring Charges:  
 Jan 15, 2014 thru Feb 18, 2014  
 15. AT&T Voice DNA(R) - Premium Feature X,XXX.XX  
 Package  
 Qty: 100.00 Items at XX.XX  
 Gross: X,XXX.XX  
 VoiceDNA Package - Premium Discount X,XXX.XXCR

Return bottom portion with your check in the enclosed envelope

att.com

DUE BY: Mar 18, 2013 \$XX,XXX.XX



Billing Date: Feb 19, 2013

Account Number 831 000-1111 111

Please include account number on your check

XYZ COMPANY  
PO BOX 555  
CITY, ST 99999-1234

Make checks payable to:

AT&T  
PO Box 5014  
Carol Stream, IL 60197-5014



```
1000 12355511111234 3000000009999 06619000000000000000000009999
```

RESTRICTED PROPRIETARY INFORMATION

[illegible]

XYZ COMPANY  
PO BOX 555  
CITY, ST 99999-1234

Page 2 of 2  
 Account Number 831 000-1111 111  
 Billing Date Jan 19, 2014  
 Questions? 1 888 235-7524  
 Web Site: att.com  
 Invoice 1234567890

## Current Charges

## Group #000001 - Continued

## Recurring Charges:

Jan 19, 2014 thru Feb 18, 2014

|  |          |
|--|----------|
| 1. Call Distribution Module                | XXX.XX   |
| Qty: 20.00 Items at XX.XX                  |          |
| Gross: X,XXX.XX                            |          |
| Call Distribution Module Discount XXX.XXCR |          |
| 2. Conferencing                            | XX.XX    |
| Qty: 20.00 Items at XX.XX                  |          |
| Gross: XXX.XX                              |          |
| Conferencing Discount XXX.XXCR             |          |
| Total Voice Over IP                        | X,XXX.XX |

## Surcharges and Other Fees

|   |        |
|---|--------|
| 3. Universal Connectivity Charge - Interstate | XXX.XX |
| 4. Administrative Expense Fee - Interstate    | XX.XX  |
| 5. Property Tax Allotment - Interstate        | XX.XX  |
| 6. Federal Regulatory Fee - Interstate        | XX.XX  |
| 7. STATE CDST - RECOVERY FEE                  | XX.XX  |
| 8. STATE CDST - RECOVERY FEE                  | XX.XX  |
| Total Surcharges and Other Fees               | XXX.XX |

## Taxes

## Federal:

|                  |      |
|------------------|------|
| 9. FEDERAL TAXES | X.XX |
|------------------|------|

## State:

|              |        |
|--------------|--------|
| 10. ST/STATE | XXX.XX |
|--------------|--------|

|                               |      |
|-------------------------------|------|
| 11. ST/9-1-1 EQUALIZATION FEE | X.XX |
|-------------------------------|------|

## County:

|                         |        |
|-------------------------|--------|
| 11. ST/LOCAL 911 CHARGE | XXX.XX |
|-------------------------|--------|

|             |        |
|-------------|--------|
| Total Taxes | XXX.XX |
|-------------|--------|

|                                       |          |
|---------------------------------------|----------|
| Total Subscriber/Router ID 9999999991 | X,XXX.XX |
|---------------------------------------|----------|

|                                     |          |
|-------------------------------------|----------|
| Total Sub-Account #831-000-0000 002 | X,XXX.XX |
|-------------------------------------|----------|

|                     |          |
|---------------------|----------|
| Total Group #000001 | X,XXX.XX |
|---------------------|----------|

|                       |          |
|-----------------------|----------|
| Total Current Charges | X,XXX.XX |
|-----------------------|----------|

## News You Can Use

## News You Can Use

## ACCOUNT STATUS

Need help understanding your bill? AT&T has created a series of billing videos to help you better understand your bill by covering key bill elements and examples of how different charges may appear on the bill. There are currently five videos, each one specific to a particular AT&T service. View the videos at <http://go-att.us/attbizbillingvideos>.

## REGULATORY NEWS

## Attention Customers:

The following charges are "Government Fees and Taxes": Federal Excise Tax; CHCF-A, CHCF-B, Univ Lifeline Tele Serv Sur, Com Dev Fnd/Deaf & Disabled, California Teleconnect Fund, State 9-1-1 Surcharge, Utility User's Tax, and Local 911 Charge.

Thank You For Choosing AT&T Where Every Customer Counts!

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XYZ COMPANY  
 PO BOX 555  
 CITY, ST 99999-1234



9565.8.231.51977 1 AV 0.255

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# IPFlex Bill

BVOIP Company FF\_Test  
1 AT&T WAY  
BEDMINSTER NJ 07921

Page 1 of 2  
Account Number 831-000-2155 832  
Billing Date Oct 11, 2011  
Questions? 1 800 235-7524  
Web Site att.com  
Invoice 4941526109

**Bill-At-A-Glance**

|                                   |                    |
|-----------------------------------|--------------------|
| Previous Bill                     | 33,338.12          |
| Payment                           | .00                |
| Adjustments                       | .00                |
| Past Due - Please Pay Immediately | 33,338.12          |
| Current Charges                   | 4,160.06           |
| <b>Total Amount Due</b>           | <b>\$37,498.18</b> |
| Current Charges Due in Full by    | <b>Nov 7, 2011</b> |

**Billing Summary**For detailed information of your charges go to  
[www.businessdirect.att.com](http://www.businessdirect.att.com)

Questions? Call: 1 800 235-7524

**AT&T Business Services**

|                               |                 |
|-------------------------------|-----------------|
| Group #000001                 |                 |
| Sub-Account #831-000-2392 450 | 319.52          |
| Sub-Account #831-000-2639 258 | 3,840.54        |
| Total Group #000001           | 4,160.06        |
| <b>Total Current Charges</b>  | <b>4,160.06</b> |

**Current Charges****Group #000001**Sub-Account #831-000-2392 450  
Charges for Subscriber/Router ID 0000489956  
225 W RANDOLPH  
CHGO, IL 60606**Voice Over IP****Recurring Charges:**

|  |        |
|--|--------|
| Oct 11, 2011 thru Nov 10, 2011                     |        |
| 1. Medium Managed Probe Charge                     | 55.80  |
| 2. AT&T IP Flexible Reach Calling Plan B           | 29.70  |
| 3. VoIP Calling Plan B                             | 148.50 |
| 4. AT&T IP Flexible Reach Telephone Numbers Plan B | .89    |

**Group #000001 - Continued****Recurring Charges:**

|                                    |        |
|------------------------------------|--------|
| Oct 11, 2011 thru Nov 10, 2011     |        |
| 5. VoIP Telephone Numbers - Plan B | 17.40  |
| Total Voice Over IP                | 252.29 |

**Surcharges and Other Fees**

|   |       |
|---|-------|
| 6. Universal Connectivity Charge - Interstate | 20.78 |
| 7. Administrative Expense Fee - Interstate    | 1.11  |
| 8. Property Tax Allotment - Interstate        | 4.50  |
| 9. Federal Regulatory Fee - Interstate        | 2.72  |
| Total Surcharges and Other Fees               | 29.11 |

**Taxes**

|  |               |
|--|---------------|
| State:                                     |               |
| 10. IL/TELECOMM EXCISE                     | 15.77         |
| 11. IL/INFRASTRUCTURE MTCE FEE             | 1.13          |
| 12. IL/ILLINOIS                            | 3.49          |
| County:                                    |               |
| 13. COUNTY TAXES                           | 1.26          |
| Local:                                     |               |
| 14. IL/CHICAGO TELECOM EXCISE              | 15.77         |
| 15. LOCAL TAXES                            | .70           |
| Total Taxes                                | 38.12         |
| Total Subscriber/Router ID 0000489956      | 319.52        |
| <b>Total Sub-Account #831-000-2392 450</b> | <b>319.52</b> |

**Sub-Account #831-000-2639 258****Charges for Subscriber/Router ID 0000248752**

200 LAUREL AV

MIDLTN TWP, NJ 07748

**Voice Over IP****Recurring Charges:**

|   |          |
|---|----------|
| Oct 11, 2011 thru Nov 10, 2011                      |          |
| 16. Medium Managed Probe Charge                     | 55.80    |
| 17. AT&T IP Flexible Reach Calling Plan B           | 29.70    |
| 18. VoIP Calling Plan B                             | 2,970.00 |
| 19. AT&T IP Flexible Reach Telephone Numbers Plan B | 4.16     |

**One Time Charges:**

|                                 |     |
|---------------------------------|-----|
| 20. International OffNet Charge | .03 |
|---------------------------------|-----|

**Surcharges and Other Fees**

|  |        |
|--|--------|
| 21. Universal Connectivity Charge - Interstate | 317.81 |
| 22. Administrative Expense Fee - Interstate    | 17.16  |
| 23. Property Tax Allotment - Interstate        | 68.81  |
| 24. Federal Regulatory Fee - Interstate        | 41.72  |
| Total Surcharges and Other Fees                | 445.50 |

**Taxes**

|  |                 |
|--|-----------------|
| State:                                     |                 |
| 25. NJ/NEW JERSEY                          | 245.35          |
| 26. NJ/911 SYSTEM/EMERG. RESP. FEE         | 90.00           |
| Total Taxes                                | 335.35          |
| Total Subscriber/Router ID 0000248752      | 3,840.54        |
| <b>Total Sub-Account #831-000-2639 258</b> | <b>3,840.54</b> |
| <b>Total Group #000001</b>                 | <b>4,160.06</b> |

**Total Current Charges****4,160.06**

Return bottom portion with your check in the enclosed envelope.

U.S. Pat. D410,950 and D414,510

**DUE BY: Nov 7, 2011 \$37,498.18**

Billing Date Oct 11, 2011

Account Number **831-000-2155 832**  
Please include your account number on your checkBVOIP Company FF\_Test  
1 AT&T WAY  
BEDMINSTER NJ 07921

Make checks payable to:

AT&T  
P.O. Box 5019  
Carol Stream, IL 60197-5019

83100021558324941526109008200000374981800004160064



## News You Can Use

### News You Can Use

#### ACCOUNT STATUS

Where allowed by law, AT&T may implement late payment interest of no more than 18% annually. Rates will vary based on state regulations. Interest will be calculated based upon daily balances and will be applicable for each day that a delinquent balance is outstanding. This charge will apply to all balances that are delinquent through such time that payment in full is received at AT&T. The late payment interest will be billed on a monthly basis. Accounts billed outside the US will not be charged LPI.

Where allowed by law, AT&T may implement a \$25 service fee for restoration of service where delinquency has caused an interruption. This fee will be applicable to each account that is being restored and will be included on your monthly billing statement.

Attention customers: AT&T will charge a \$25 fee for any check returned for insufficient funds, applied on your next invoice. AT&T values your business and thanks you for your cooperation in this matter.

Some products require electronic billing as their official bill media. When electronic billing is the official bill media, an informational statement may be sent containing some of the same information as the electronic bill. The informational statement is not your bill. However, if you choose to mail your payment instead of paying electronically, the informational statement has a tear-off that can be used to submit your payment.

#### REGULATORY NEWS

##### Attention customers in Montana and Ohio

Effective July 17, 2011 AT&T began assessing the Local 911 Charge and the Telephone Relay Charge for AT&T IP Flexible Reach service, pursuant to local and state laws and regulations. AT&T VoiceDNA customers will continue to see the Local 911 Charge and the Telephone Relay Charge on your bill. For more information please call the AT&T Customer Care Center at the toll-free billing inquiries number listed on your invoice or contact your AT&T Sales Representative.

##### Attention customers in Illinois

Effective July 17, 2011 AT&T began assessing the Local 911 Charge on your AT&T IP Flexible Reach bill, pursuant to local and state laws and regulations. AT&T VoiceDNA customers will continue to see the Local 911 Charge on your bill.

Also, effective July 17, 2011, AT&T began assessing the Telephone Relay Charge for IP Flexible Reach and VDNA services. For more information please call the AT&T Customer Care Center at the toll-free billing inquiries number listed on your invoice or contact your AT&T Sales Representative.

##### Attention customers in Missouri

Effective July 17, 2011 AT&T began assessing the Local 911 Charge on your AT&T IP Flexible Reach bill, pursuant to local and state laws and regulations. AT&T VoiceDNA customers will continue to see the Local 911 Charge on your bill. Also, effective July 17, 2011, AT&T began assessing the state Universal Service Fund (USF) and Missouri License for IP Flexible Reach and the Telephone Relay Charge for IP Flexible Reach and VDNA services. For more information please call the AT&T Customer Care Center at the toll-free billing inquiries number listed on your invoice or contact your AT&T Sales Representative.

##### Attention customers in Nebraska

Effective July 17, 2011 AT&T began assessing the Local 911 Charge on your AT&T IP Flexible Reach bill, pursuant to local and state laws and regulations. AT&T VoiceDNA customers will continue to see the Local 911 Charge on your bill. Also, effective July 17, 2011, AT&T began assessing the Telephone Relay Charge for IP Flexible Reach and VDNA services. For more information please call the AT&T Customer Care Center at the toll-free billing inquiries number listed on your invoice or contact your AT&T Sales Representative.

### News You Can Use

#### REGULATORY NEWS - Continued

##### Attention customers in New Mexico

Effective July 17, 2011 AT&T began assessing the Local 911 Charge and the state Universal Service Fund (USF) for AT&T IP Flexible Reach service, pursuant to local and state laws and regulations. AT&T VoiceDNA customers will continue to see the Local 911 Charge on your bill. For more information please call the AT&T Customer Care Center at the toll-free billing inquiries number listed on your invoice or contact your AT&T Sales Representative.

Thank You For Choosing AT&T Where Every Customer Counts!

# U-verse Bill





AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

Page: 1 of 3  
Bill Cycle Date: 11/07/13 - 12/06/13  
Account: 123456789

## Sample Bill

Visit us online at: [www.att.com](http://www.att.com)

### U-verse Statement

#### Bill-At-A-Glance

|                              |                 |
|------------------------------|-----------------|
| Previous Balance             | \$121.39        |
| Payment - 11/28 - Thank You! | \$121.39CR      |
| Adjustments                  | \$0.00          |
| Balance                      | \$0.00          |
| New Charges                  | \$111.05        |
| <b>Total Amount Due</b>      | <b>\$111.05</b> |
| Amount Due in Full by        | Dec 30, 2013    |

#### Service Summary

| Service                  | Page | Total           |
|--------------------------|------|-----------------|
| Account Charges          | 1    | \$6.14          |
| U-verse TV               | 1    | \$41.20         |
| U-verse Internet         | 2    | \$30.00         |
| U-verse Voice            | 2    | \$33.71         |
| <b>Total New Charges</b> |      | <b>\$111.05</b> |

#### How to Contact Us:

For Ordering, Billing or Support: Call 800-288-2020  
For TTY: Call 800-855-2880 and type "U-verse"  
For Online Billing and Account Support:  
Visit [att.com/bill](http://att.com/bill)



For Important Information about your bill, please see the **News You Can Use** section (Page 2).

Return bottom portion with your check in the enclosed envelope.  
Payments may take 7 days to post.

**DUE BY: Dec 30, 2013 \$111.05**



Account Number **123456789-4**  
Please include account number on your check.

AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

☐ CHECK FOR AUTO PAY  
(SEE REVERSE)

Make checks payable to:

AT&T  
PO BOX 5014  
CAROL STREAM, IL 60197-5014



#### What can U-verse® do for you?



Record 4 shows  
at once with a  
Total Home DVR\*  
included for life



Home internet  
with more speed  
options - up to  
24Mbps downstream



Take the U-verse  
experience with you  
on your smartphone  
and watch from a library  
of On Demand programs

Learn more today.

Call 855.201.2763 or visit [att.com/uverse06002](http://att.com/uverse06002)

*U-verse. Entertainment inspired by you.*

Geo and svc restrictions apply to AT&T U-verse services.

#### Account Charges

##### Monthly Charges - Dec 7 thru Jan 6

|                                      |      |
|--------------------------------------|------|
| 1. High Speed Internet Equipment Fee | 6.00 |
|--------------------------------------|------|

##### Other Charges and Credits

##### Government Fees and Taxes

|                                 |      |
|---------------------------------|------|
| 2. County District Sales Tax    | 0.06 |
| 3. Local Video Facilities Fee   | 0.08 |
| Total Government Fees and Taxes | 0.14 |

**Total Other Charges & Credits 0.14**

**Total Account Charges 6.14**

#### U-verse TV

##### Monthly Charges - Dec 7 thru Jan 6

|   |         |
|---|---------|
| 1. AT&T U-verse TV U200   | 74.00   |
| 2. AT&T U-verse TV U200 (Bundle Discount)<br>(Expires 08/16/2014) | 40.00CR |

**Total Monthly Charges 34.00**

AT&T U-verse(SM) Services provided by AT&T <Your State>.

Printed on Recyclable Paper

41004033000123456789400000001213900000001110500005



AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

Page 2 of 3  
Bill Cycle Date: 11/07/13 - 12/06/13  
Account: 123456789

# Sample Bill

Visit us online at: [www.att.com](http://www.att.com)

## U-verse TV - Continued

### Other Charges and Credits

#### Surcharges and Other Fees

|                                      |      |
|--------------------------------------|------|
| 3. Broadcast TV Surcharge            | 1.99 |
| 4. Local Video Service Franchise Fee | 2.01 |
| Total Surcharges and Other Fees      | 4.00 |

#### Government Fees and Taxes

|                                 |      |
|---------------------------------|------|
| 5. County Sales Tax             | 0.96 |
| 6. State Sales Tax              | 2.24 |
| Total Government Fees and Taxes | 3.20 |

Total Other Charges & Credits 7.20

Total U-verse TV 41.20

## U-verse Internet

**AT&T High Speed Internet Elite** - provides the speed and security you need, including built-in wireless home networking capability, access to AT&T's entire National Wi-Fi network, 11 email accounts, photo storage, AT&T Security Suite powered by McAfee, pop-up blocker, and parental controls.

### Monthly Charges - Dec 7 thru Jan 6

|   |         |
|---|---------|
| 1. AT&T U-verse Internet Elite  | 46.00   |
| 2. AT&T U-verse Internet Elite (Bundle Discount) (Expires 08/16/2014) | 16.00CR |

Total Monthly Charges 30.00

Total U-verse Internet 30.00

## U-verse Voice

**U-verse Voice** - Includes over 20 features, including advanced features that integrate with U-verse TV, Internet, and Wireless from AT&T.

### Monthly Charges - Dec 7 thru Jan 6

|  |       |
|--|-------|
| 1. AT&T U-verse Voice Unlimited 123 555-1111 | 35.00 |
|--|-------|

## Monthly Charges - Continued

|  |        |
|--|--------|
| 2. AT&T U-verse Voice 123 555-1111 (Promotional Offer) | 5.00CR |
|--|--------|

Total Monthly Charges 30.00

### Other Charges and Credits

#### Call Detail Charges 123 555-1111

|                          |       |
|--------------------------|-------|
| Domestic Off-net Charges |       |
| Minutes Used             | 2,548 |
| Number of Calls          | 211   |

#### Surcharges and Other Fees

|                                   |      |
|-----------------------------------|------|
| 3. Federal Universal Service Fund | 3.04 |
| 4. State Universal Service Fund   | 0.41 |
| 5. State Universal Service Fund   | 0.01 |
| Total Surcharges and Other Fees   | 3.46 |

#### Government Fees and Taxes

|                           |      |
|---------------------------|------|
| 6. County 911 Service Fee | 0.25 |
|---------------------------|------|

Total Other Charges & Credits 3.71

Total U-verse Voice 33.71

## News You Can Use

### NO TEXT IS WORTH THE RISK

Take the pledge at [www.itcanwait.com](http://www.itcanwait.com), and make a commitment to end texting while driving. No text is worth the risk. It Can Wait.

## Important Information

### LATE PAYMENT FEE

A Late Payment Charge of \$8.00 will be assessed if payment is not received on or before the due date.

### ELECTRONIC CHECK CONVERSION

Paying by check authorizes AT&T to use the information from your check to make a one-time electronic fund transfer from your account. Funds may be withdrawn from your account as soon as the same day your payment is received. If we cannot

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ts020714

AutoPay Enrollment  
If I enroll in AutoPay, I authorize AT&T to pay my bill monthly by electronically deducting money from my bank account. I can cancel authorization by notifying AT&T at [www.att.com](http://www.att.com) or by calling the customer care number listed on my bill.  
Bank Account Holder Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

9565.8.231.51977 1 AV 0.340  
AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234





AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

Page 3 of 3  
Bill Cycle Date: 11/07/13 - 12/06/13  
Account: 123456789

## Sample Bill

Visit us online at: [www.att.com](http://www.att.com)

### Important Information - Continued

process the transaction electronically, you authorize AT&T to present an image copy of your check for payment. Your original check will be destroyed once processed. If your check is returned unpaid you agree to pay such fees as identified in the terms and conditions of your AT&T Service Agreement. Returned checks may be presented electronically. If you want to save time and stamps, sign up for auto payment at [www.att.com/stoppaper](http://www.att.com/stoppaper) using your checking account. It's easy, secure, and convenient!

#### SUPPORT WHEN YOU NEED IT

Need help resolving a problem or want to learn more about the latest AT&T products? Find answers to commonly asked questions, get troubleshooting tips and so much more at [att.com/UverseSupport](http://att.com/UverseSupport).

#### ACCOUNT MANAGEMENT MADE EASY

View and pay your bill, track On Demand purchases, change your plan and features and find support for your U-verse services all in one place. Visit [att.com/myuverse](http://att.com/myuverse) or go to Channel 9910 today!

#### LEGAL NOTIFICATION

For information on upcoming U-verse TV programming changes please consult the Legal Notices published in USA Today on the first and third Tuesday of each month or our website [att.com/U-verseprogrammingchanges](http://att.com/U-verseprogrammingchanges).

#### U-VERSE CLOSED CAPTIONING TECHNICAL SUPPORT:

Telephone: 866-912-8216  
Fax: 866-750-6606  
E-mail: [closedcaphelp@att.com](mailto:closedcaphelp@att.com).

#### CLOSED CAPTIONING ISSUES:

Mailing Address: AT&T Closed Captioning, ATTN: Ms. Strohl,  
1010 Pine St., 6-E-22, St. Louis, MO 63101  
Telephone: 314-235-3333  
Fax: 314-335-5735  
E-mail: [U-verseClosedCaptioning@att.com](mailto:U-verseClosedCaptioning@att.com).

# Wireless Home Phone Bill





AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

Page: 1 of 4  
Bill Cycle Date: 04/03/13 - 05/02/13  
Account: 123456789124

Sample Bill

Visit us online at: [www.att.com](http://www.att.com)

## Wireless Statement

### Bill-At-A-Glance

|                              |                 |
|------------------------------|-----------------|
| Previous Balance             | \$187.59        |
| Payment - 04/22 - Thank You! | \$187.59CR      |
| Adjustments                  | \$0.00          |
| Balance                      | \$0.00          |
| New Charges                  | \$161.79        |
| <b>Total Amount Due</b>      | <b>\$161.79</b> |
| Amount Due in Full by        | May 22, 2013    |

### Service Summary

| Service                  | Page | Total           |
|--------------------------|------|-----------------|
| <b>Wireless</b>          |      | \$161.79        |
| 123 444-2323 \$124.57    | 1    |                 |
| 123 444-3434 \$37.22     | 3    |                 |
| <b>Total New Charges</b> |      | <b>\$161.79</b> |

#### How to Contact Us:

For questions about your account: 1 800 331-0500  
or 611 from your cell phone  
For Deaf/Hard of hearing TTY: 1 866 241-6567  
Visit us online at [www.att.com](http://www.att.com)

For Important Information about your bill, please  
see the **News You Can Use** section (Page 3).

Return bottom portion with your check in the enclosed envelope.  
Payments may take 7 days to post.

**DUE BY: May 22, 2013 \$161.79**



Account Number **123456789124**  
Please include account number on your check.

AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

☐ CHECK FOR AUTO PAY  
(SEE REVERSE)

Make checks payable to:

AT&T MOBILITY  
PO BOX 537104  
ATLANTA GA 30353-7104



947001234567891240000000016179000000000016179004

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### Wireless

#### Group 1 - Data Summary

**Mobile Share 1GB with Unlimited Talk & Text** - Includes 1  
1 gigabyte of domestic data, \$15 per each additional 1 gigabyte  
of data. Additional monthly charge applies for each device on  
the plan. Unlimited talk & text on phones. Mobile Hotspot,  
tethering, video calling, and Visual Voicemail available with  
compatible devices. Unlimited domestic data usage on the  
AT&T Wi-Fi Basic network.

|              | Mobile Share<br>Data Used (MB) |
|--------------|--------------------------------|
| 123 444-2323 | 818                            |
| 123 444-3434 | 205                            |
| <b>Total</b> | <b>1,023</b>                   |



**123 444-2323**  
AT&T CUSTOMER NAME

**Mobile Share for Smartphone 4G LTE** - Includes unlimited  
Anytime Minutes, Nationwide Long Distance & Roaming,  
Unlimited domestic text, picture, video and instant messages  
and unlimited calling to/from any other domestic mobile phone,  
Call Forward feature, Caller ID, Call Wait, Conference Call feature.  
Mobile Share voice and data plan required.

Wireless Services provided by AT&T Mobility, LLC.

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at&amp;t

AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234Page 2 of 4  
Bill Cycle Date: 04/03/13 - 05/02/13  
Account: 123456789124

## Sample Bill

Visit us online at: [www.att.com](http://www.att.com)123 444-2323  
AT&T CUSTOMER NAME

## Monthly Charges - May 3 thru Jun 2

- |  |       |
|--|-------|
| 1. Mobile Share 1GB with Unlimited Talk & Text | 40.00 |
| 2. Mobile Share for iPhone on 4G LTE           | 45.00 |

Get help and manage your purchases several ways:

- Go to [att.com/MobilePurchases](http://att.com/MobilePurchases)
- To speak with a service representative, dial 611 from your mobile phone, or 1 800-331-0500 from any phone.

To stop a subscription, text STOP to the Short Code using the mobile phone associated with those charges. If a Short Code is not listed go to [att.com/directbill](http://att.com/directbill).

## AT&amp;T Monthly Subscriptions

| Date                             |   | Cost | Tax  |       |
|----------------------------------|---|------|------|-------|
| 3. 04/14                         | ApplicationsSub: ATT Navigator with promo<br>Provider: Telenav Inc<br>Contact: <a href="http://www.att.com/mobilepurchases">www.att.com/mobilepurchases</a><br>Renew Date: 05/13/2013 | 9.99 | 0.00 | 9.99  |
| 4. 04/16                         | Multiple Types:<br>Casualite Alerts<br>Short Code: 84425 ID: 12143<br>Provider: Itelia<br>Contact: 1-800-331-0500<br>Renew Date: 05/15/2013   | 9.99 | 0.00 | 9.99  |
| Total AT&T Monthly Subscriptions |   |      |      | 19.98 |

## 3rd Party Monthly Subscriptions

| Date                                  |  | Cost | Tax  |      |
|---------------------------------------|--|------|------|------|
| 5. 04/11                              | Access: 30 Day Subscription<br>Short Code: 3000 ID: 19449<br>Merchant: Animal Jam<br>Contact: BilltoMobile: 888-654-6494<br>Renew Date: 05/10/2013 | 5.95 | 0.00 | 5.95 |
| Total 3rd Party Monthly Subscriptions |  |      |      | 5.95 |

Total Monthly Charges 110.93

## Other Charges and Credits

## Voice Usage Summary

|   |           |
|---|-----------|
| Mobile Share with Unlimited Talk & Text | Unlimited |
| Daytime Minutes                         |           |
| Minutes Used                            | 297       |
| Night & Weekend Minutes                 |           |
| Minutes Used                            | 415       |

## Other Charges and Credits - Continued

## Data Usage Summary

|   |           |
|---|-----------|
| Mobile Share with Unlimited Talk & Text     | Unlimited |
| Used  | 255       |
| Mobile Share 1GB with Unlimited Talk & Text |           |
| Included in Plan MB                         | 1,024     |
| Individual MB Used                          | 818       |
| Others in Group MB Used                     | 205       |

1 Gigabyte (GB) = 1024 MB, 1 Megabyte (MB) = 1024 KB

Get help and manage your purchases several ways:

- Go to [att.com/MobilePurchases](http://att.com/MobilePurchases)
- To speak with a service representative, dial 611 from your mobile phone, or 1 800-331-0500 from any phone.

## AT&amp;T Purchases and Downloads

| Date                               |  | Cost  | Tax  |       |
|------------------------------------|--|-------|------|-------|
| 6. 04/19                           | Multiple Types:<br>Ringtones Universe<br>Provider: AT&T AppCenter - FunMobility Inc.<br>Contact: <a href="http://att.com/mobilepurchases">att.com/mobilepurchases</a>              | 3.99  | 0.47 | 4.36  |
| 7. 04/22                           | Charitable: mGiveFndn<br>Short Code: 80108 ID: 19934<br>Provider: mGive<br>Contact: <a href="http://att.com/mobilepurchases">att.com/mobilepurchases</a>                           | 10.00 | 0.00 | 10.00 |
| 8. 04/24                           | Text Services: CBS Big Brother ITV Vote<br>Short Code: 81818 ID: 19634<br>Provider: mGive<br>Contact: <a href="http://www.att.com/mobilepurchases">www.att.com/mobilepurchases</a> | 1.00  | 0.06 | 1.06  |
| Total AT&T Purchases and Downloads |  |       |      | 4.36  |

## 3rd Party Purchases and Downloads

| Date                                    |  | Cost  | Tax  |       |
|---|--|-------|------|-------|
| 9. 04/22                                | Product 1380 RIOT POINT<br>Short Code: 26588 ID: 36471<br>Merchant: Riot Games<br>Contact: BOKU Inc.: 800-495-1823 | 10.00 | 0.00 | 10.00 |
| Total 3rd Party Purchases and Downloads |  |       |      | 10.00 |

## Surcharges and Other Fees

|                                      |      |
|--------------------------------------|------|
| 10. Administrative Fee               | 0.61 |
| 11. Federal Universal Service Charge | 3.21 |
| 12. Regulatory Cost Recovery Charge  | 0.45 |
| Total Surcharges and Other Fees      | 4.27 |

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AutoPay Enrollment  
If I enroll in AutoPay, I authorize AT&T to pay my bill monthly by electronically deducting money from my bank account. I can cancel authorization by notifying AT&T at [www.att.com](http://www.att.com) or by calling the customer care number listed on my bill.  
Bank Account Holder Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

9565.8.231.51977 1 AV 0.340





AT&T CUSTOMER  
1234 TELEPHONE LN  
ANY CITY ST 99999 - 1234

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Bill Cycle Date: 04/03/13 - 05/02/13  
Account: 123456789124

# Sample Bill

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**123 444-2323**  
AT&T CUSTOMER NAME

## Other Charges and Credits - Continued

### Government Fees and Taxes

|                                  |      |
|----------------------------------|------|
| 13. 9-1-1 Service Fee            | 1.20 |
| 14. County Sales Tax - Telecom   | 1.84 |
| 15. NY State Sales Tax - Telecom | 1.96 |
| Total Government Fees and Taxes  | 5.00 |

**Total Other Charges & Credits 23.63**

**Total for 123 444-2323 124.57**



**123 444-3434**  
AT&T CUSTOMER NAME

**Mobile Share for Basic Phone** - Includes unlimited Anytime Minutes, Nationwide Long Distance & Roaming, Unlimited domestic text, picture, video and instant messages and unlimited calling to/from any other domestic mobile phone, Call Forward feature, Caller ID, Call Wait, Conference Call feature. Mobile Share voice and data plan required.

## Monthly Charges - May 3 thru Jun 2

|                                 |       |
|---------------------------------|-------|
| 1. Mobile Share for Basic Phone | 30.00 |
|---------------------------------|-------|

## Other Charges and Credits

### Voice Usage Summary

|   |           |
|---|-----------|
| Mobile Share with Unlimited Talk & Text | Unlimited |
| Daytime Minutes                         |           |
| Minutes Used                            | 937       |
| Night & Weekend Minutes                 |           |
| Minutes Used                            | 715       |

### Data Usage Summary

|   |           |
|---|-----------|
| Mobile Share with Unlimited Talk & Text | Unlimited |
| Used                                    | 259       |

|   |     |
|---|-----|
| Mobile Share 1GB with Unlimited Talk & Text |     |
| Individual MB Used                          | 205 |

1 Gigabyte (GB) = 1024 MB, 1 Megabyte (MB) = 1024 KB

## Surcharges and Other Fees

|                                     |      |
|-------------------------------------|------|
| 2. Administrative Fee               | 0.61 |
| 3. Federal Universal Service Charge | 1.48 |

## Other Charges and Credits - Continued

|                                    |      |
|------------------------------------|------|
| 4. Regulatory Cost Recovery Charge | 0.45 |
| 5. State Telecommunications Excise | 0.94 |
| Surcharge                          |      |
| Total Surcharges and Other Fees    | 3.48 |

### Government Fees and Taxes

|                                 |      |
|---------------------------------|------|
| 6. 9-1-1 Service Fee            | 1.20 |
| 7. County Sales Tax - Telecom   | 1.23 |
| 8. NY State Sales Tax - Telecom | 1.31 |
| Total Government Fees and Taxes | 3.74 |

**Total Other Charges & Credits 7.22**

**Total for 123 444-3434 37.22**

**Total for Wireless accounts 161.79**

## News You Can Use

### ADD A TABLET FROM AT&T

Enjoy gaming, surfing and streaming on more than just Wi-Fi - add a tablet from AT&T today. Call 1-800-449-1672 or visit [att.com/addaline](http://att.com/addaline) to get started.

## Important Information

### LATE PAYMENT FEE

Accounts with former AT&T Wireless plans are charged 1.5% or less of the balance unpaid as of the next bill period. Accounts with Cingular/new AT&T plans are charged \$5 in CT, DC, DE, IL, KS, MA, MD, ME, MI, MO, NH, NJ, NY, PA, OK, OH, RI, VA, VT, WI, WV, or 1.5% of the balance unpaid as of the next bill period in all other states. Accounts with former AT&T Wireless and Cingular/new AT&T plans incur the lesser of these charges.

### ELECTRONIC CHECK CONVERSION

Paying by check authorizes AT&T to use the information from your check to make a one-time electronic fund transfer from your account. Funds may be withdrawn from your account as soon as the same day your payment is received. If we cannot process the transaction electronically, you authorize AT&T to present an image copy of your check for payment. Your original check will be destroyed once processed. If your check



AT&T CUSTOMER  
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Bill Cycle Date: 04/03/13 - 05/02/13  
Account: 123456789124

*Sample Bill*

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**Important Information - Continued**

is returned unpaid you agree to pay such fees as identified in the terms and conditions of your AT&T Service Agreement. Returned checks may be presented electronically. If you want to save time and stamps, sign up for auto payment at [www.att.com/stoppaper](http://www.att.com/stoppaper) using your checking account. It's easy, secure, and convenient!

**TAX ID**

AT&T Mobility Tax ID # 84-1659970.

**SURCHARGES AND OTHER FEES**

In addition to the monthly cost of the rate plan and any selected features, AT&T imposes the following other charges, on a per line basis: (1) federal and state universal service charges, (2) a Regulatory Cost Recovery Charge of up to \$1.25 to help defray its cost incurred in complying with obligations and charges imposed by state and federal telecom regulations, (3) an Administrative Fee on consumer and Individual Responsibility User (IRU) lines to help defray certain expenses AT&T incurs, such as interconnection and cell site rents and maintenance, and (4) other government assessments, including without limitation a gross receipts surcharge and a Property Tax Allotment surcharge of \$0.20 - \$0.45 applied per Corporate Responsibility User's assigned number. These fees are not taxes or government-required charges. See [att.com/additionalcharges](http://att.com/additionalcharges).

**SINGLE PAYMENT AGREEMENT (FOR KIOSK PAYMENT)**

For Kiosk Payment: I authorize AT&T to pay my bill by debiting my bank account. If my bank rejects a payment, I may be charged a return fee up to \$30.

**AT&T NATL CENTER FOR CUSTOMERS WITH DISABILITIES**

Questions on accessibility by persons with disabilities:  
1 866 241-6568.

**WRITTEN CORRESPONDENCE**

Do not send notes/letters with payment. We cannot guarantee receipt. Send notes/letters to AT&T Mobility Customer Care, PO Box 755, Atwater, CA 95301