

Ruth Nettles

080108-TL

From: Woods, Vickie [vf1979@att.com]
Sent: Thursday, February 21, 2008 3:01 PM
To: Filings@psc.state.fl.us
Subject: New Docket: AT&T Florida's Petition to Permit Use of "Federal Subscriber Line Charge" to Identify the Interstate End User Charge on Customer's Bills
Importance: High
Attachments: New_Peti.pdf

- A. Vickie Woods
Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch
and Manuel A. Gurdian
AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vf1979@att.com
- B. New Docket:
Petition to permit use of "Federal Subscriber Line Charge" to identify the Interstate End User Charge on Customers' Bills by AT&T Florida
- C. AT&T Florida
on behalf of Manuel A. Gurdian
- D. 6 pages total (including letter, pleading and certificate of service)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition to Permit Use of "Federal Subscriber Line Charge" to Identify the Interstate End User Charge on Customer's Bills

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<<New_Peti.pdf>>

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2/21/2008

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February 21, 2008

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

080108-72

**Re: Petition to permit use of "Federal Subscriber
Line Charge" to identify the Interstate End User Charge on
Customers' Bills by AT&T Florida**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's
Petition to Permit Use of "Federal Subscriber Line Charge" to Identify the
Interstate End User Charge on Customer's Bills, which we ask that you file in the
captioned *new* docket.

A copy of this letter is enclosed. Please mark it to indicate that the original
was filed and return the copy to me. Copies have been served to the parties
shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa S. Foshee

DOCUMENT NUMBER-DATE

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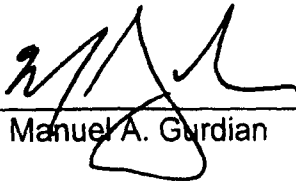
CERTIFICATE OF SERVICE

New Docket:

**In re: Petition to permit use of "Federal Subscriber
Line Charge" to identify the Interstate End User
Charge on Customers' Bills by AT&T Florida**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and (*) First Class U. S. Mail this 21st day of February, 2008 to the
following:

Adam Teitzman
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
ateitzma@psc.state.fl.us



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to permit use of "Federal Subscriber)
Line Charge" to identify the Interstate End User)
Charge on Customers' Bills by AT&T Florida)
_____)

Docket No. 080108-TL

Filed: February 21, 2008

**AT&T FLORIDA'S PETITION TO PERMIT USE OF "FEDERAL
SUBSCRIBER LINE CHARGE" TO IDENTIFY THE INTERSTATE END
USER CHARGE ON CUSTOMERS' BILLS**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), by and through its undersigned counsel, hereby petitions the Florida Public Service Commission ("Commission") to allow AT&T Florida to use the term "Federal Subscriber Line Charge" to identify the Interstate End User Charge on its customers' bills. In support thereof, AT&T Florida states the following:

1. Petitioner, AT&T Florida, is a Georgia corporation certificated to provide, and actually providing, telecommunications service in the State of Florida.
2. AT&T Florida's principal place of business is 675 W. Peachtree Street, NE, Atlanta, Georgia 30375.
3. All pleadings, notices and other documents directed to AT&T Florida in this proceeding should be provided to:

E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
c/o Gregory R. Follensbee
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DOCUMENT NUMBER-DATE

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Lisa S. Foshee
AT&T Southeast
675 West Peachtree Street,
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Atlanta, GA 30375
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404.335.0750 (telephone)

Jurisdiction

4. The Commission has jurisdiction over this Petition pursuant to the authority granted to the Commission in Chapter 364, Florida Statutes. The substantial interests of AT&T Florida will be affected by the Commission's determination as to the matter set forth below.

Commission Orders

5. On December 9, 1983, the Commission issued Order No. 12765, requiring that all bills to customers refer to the interstate end user charge as the "FCC charge for interstate toll access."

6. On July 3, 1984, the Commission issued Order No. 13476, which provided several alternatives that could be used to identify the interstate end user charge: (1) "FCC interstate toll access charge;" (2) "FCC interstate (L)ong (D)istance access charge;" and (3) "FCC/toll access."

7. On September 30, 2004, the Commission issued Order No. PSC-04-0956-PAA-TL, which allowed AT&T Florida to use the phrase "FCC authorized charge for network access" on its bills.

Request for Relief

8. Today, AT&T Florida uses the term "FCC authorized charge for network access" to identify the interstate end user charge on its customers' bills.

9. In the 13 State Legacy-SBC region and in the 9 State Legacy- BellSouth region, other than Florida, AT&T uses or has authorization to use the term "Federal Subscriber Line Charge" to describe the interstate end user charge on its bills. AT&T intends to implement the "Federal Subscriber Line Charge" language on its bills in the 9 State Legacy- BellSouth region upon this Commission's approval to use this language in Florida.

10. In addition to AT&T's use of the term, other telecommunications service providers across the country and Florida¹ use "Federal Subscriber Line Charge" to describe the charge.

11. AT&T Florida believes that use of this term will lessen customer confusion when residents move to Florida from other states or within Florida, in that these customers would already be familiar with the use of the term and not inquire as to why there is an unfamiliar charge on their bills.²

12. Therefore, in order to be consistent across its 22-state footprint and to avoid customer confusion by having different names for the same charge, AT&T requests that the Commission allow it to use the "Federal Subscriber Line Charge" on the bills of its Florida customers.

13. Moreover, if the change requested in the instant Petition is not granted, AT&T Florida, in order to continue to comply with the Orders' requirements, will incur (1) information technology costs to support unique wording for Florida only and (2) training costs to train its customer service representatives on two different types of

¹ AT&T Florida is aware that at least two other Florida telecommunications service providers currently use "Federal Subscriber Line Charge" to describe the charge.

² The use of "Federal Subscriber Line Charge" would also lessen confusion among "snowbirds" who reside part of the year in Florida and part of the year in another state.


wording for the same charge. The incurrence of these costs, as well as any other currently unidentifiable costs to maintain different wording for the charge on an ongoing basis, is an inefficient use of resources.

14. AT&T Florida believes that the proposed language still fulfills the purposes of the underlying Orders, which was to inform customers about the charge.


WHEREFORE, for the foregoing reasons, AT&T Florida respectfully requests that the Commission allow AT&T Florida to use the term "Federal Subscriber Line Charge" to describe the interstate end user charge.

Respectfully submitted this 21st day of February 2008.

AT&T FLORIDA



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