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c/o The Florida Legislature  
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850-488-9330

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AUG 29 PM 3:21

COMMISSION  
CLERK

August 29, 2001

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 010774-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies the  
Comments of Florida Citizens.

Please indicate the time and date of receipt on the enclosed duplicate of this letter  
and return it to our office.

Sincerely,

Stephen M. Presnell  
Associate Public Counsel

- APP 1
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
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- SER \_\_\_\_\_
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FPSC-BUREAU OF RECORDS

*Haye*  
*Done 8/31/01*

DOCUMENT NUMBER-DATE

10776 AUG 29 01

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of The Citizens )  
of the State of Florida to )  
initiate rulemaking which will )  
require telephone companies to )  
give customers reasonable notice )  
before customers incur higher )  
charges or change in services, )  
and allow them to evaluate )  
competing alternative providers. )  
\_\_\_\_\_ /

Docket No. 010774-TP

Filed: August 29, 2001

**COMMENTS OF FLORIDA CITIZENS**

The Florida Public Service Commission rules do not require telephone companies to provide notice to customers of price increases in advance of the implementation of new rates or changes in the terms and conditions of service.

Historically, notification of price changes was accomplished by providing copies of telephone company tariffs in business offices that were located in every exchange area and by the required publication of public notices and customer notification when companies applied for general rate increases that required public hearings.

Today, many telecommunications companies do not have public offices. Their tariffs are not generally available to the public. And the days of general rate cases and public hearings have disappeared along with rate of return regulation.

The advent of competitive local, intralata and interlata services has created a myriad of new suppliers engaged in offering a wide range of basic and optional services and packages that, in total, can become bewildering to an individual consumer. Even the most sophisticated of telecommunications customers is challenged to achieve the level of understanding that is necessary for the consumer to benefit from the competitive marketplace. Uninformed consumers make for an inefficient marketplace in which companies achieve financial gain through consumer ignorance.

Common sense dictates that parties to a contract for ongoing services must have adequate advance notice when the prices, terms or conditions of the service contract change. We do not contest the ability of telecommunications companies to change their prices. We do, however, take exception to the practice of not notifying customers of a change in price or other terms and conditions that result in increased rates. Current procedures at best provide notice of price changes after the fact, thus denying a customer the ability to make a market decision in advance of a price change. Unless the rules are changed, telecommunications consumers will continue to be made aware of price increases only when they receive a new bill, after the fact, and only if they should notice a change in price. However, the dark side of the existing equation is that under

DOCUMENT NUMBER-DATE

10776 AUG 29 01

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current rules, telecommunications companies can engage in ongoing changes in prices and terms and conditions that work to the detriment of their subscribers without the customer ever being aware of the changes.

Changes in the terms and conditions of a service can have the same effect on customers as a price increase, and such changes should also require advance notice to customers. Examples of changes in terms and conditions that could result in increased cost to customers would be changes in timing methodologies (i.e. rounding up) or addition of new rate elements that were previously part of the basic service rates (e.g. addition of a property tax rate element, or addition of a separate gross receipts tax rate element). The proposed rule includes both price changes and terms and conditions that either impact prices customers pay, or increase cost to subscribers as a result of a change in terms and conditions.

Existing Florida rules do not even ensure that, after the fact, customers will be aware of price increases, because itemization of prices is required only once a year.

The proposed rule includes a requirement that customers should receive notice regarding rate decreases and that such notice need not be made in advance. The carriers should not have the right to arbitrarily change prices or terms and conditions without notice. The improvements in rates and terms and conditions may not be satisfactory to the customers. Informed consumers are critical to the efficient functioning of a competitive market.

It is worthwhile to note that the FCC recently required long distance carriers to establish web sites that contain price lists on a current basis. (This is an inadequate solution -- many customers have neither the access nor skill required to use the Internet. Besides, how often should they look?) While the requirement may help some consumers to be aware of alternatives in the marketplace, it does not deal with the problems of lack of advance notice or the surreptitious price increase that is overlooked by the ratepayer. The FCC "notice requirement" puts the burden on the customers to seek out information that should be provided to them.

This issue (and many of the requirements in the Office of Public Counsel's proposed rule) is not unique to the State of Florida. For example, The National Association of Regulatory Utility Commissioners (NARUC), Truth-in-Billing Work Group concluded that "A model rule that at a minimum requires conspicuous written notification of any changes in rates or calling plans is likely to ensure customers' receipt of timely information of future charges; this will also allow the customer to make informed decisions regarding his or her telephone service". (Attachment 1).

Consistent with the NARUC "Truth in Billing" model rules, the NARUC Consumer Affairs Committee, on June 4, 2001, registered its complaints to the nation's major long distance carriers regarding failure to provide advance notice to customers of recent price increases. (Attachment 2)

The State of Vermont Public Service Board found that "all customers need to have information on any changes in the price and terms and conditions of service that could increase a customer's

costs to the consumer prior to taking service. This notice should be provided individually to consumers far enough in advance of the onset of price increases to allow the customer to explore other options and switch service providers". (Attachment 3).

Thereafter, the Board required:

Telecommunications companies shall provide notice of any change in rates or other terms and conditions of service directly to each consumer that may be affected by the change in rates. If the change may increase the cost of service for a consumer, notice shall be provided at least 30 days in advance of any change in rates or terms and conditions of service, except that companies may provide notice through bill inserts provided that customers are notified at least 15 days in advance of the effective date of the change. If the Board allows a rate increase to take effect on less than 30-days' notice, the companies shall instead provide notice no later than the date on which the change is implemented. In the case of a rate decrease, companies shall notify each affected consumer no later than the first bill following implementation of the rate change. (Attachment 3).

The State of Minnesota permits telecommunications carriers to decrease rates "effective without notice to its customers or the commission" (Minnesota Statutes, 2000, 237.74(6)). Minnesota law also provides that a telecommunications carrier's filed tariff or price list is no "defense to any action brought for failure to disclose intrastate prices for which disclosure is required under this section" (Minnesota Statutes 2000, 237.662(3)).

The California Public Utilities Commission, "Telecommunications Division Staff Report and Recommendations", suggests that telecommunications carriers should notify customers "of any increase in rates, charges, or change in terms and conditions contained in an agreement that negatively impact the customer, at least 15 calendar days before the change becomes effective, with the exception of mandated fees." (Attachment 4) The staff further suggested that the notice should be "legible and printed in a 10-point type or larger. Such notice shall be sent via first class mail or through electronic means agreeable to the customer. . . ." (Attachment 4).

In Oklahoma, AT&T was forced to rescind a rate increase that was implemented in July 1999 because of angry customers who objected to increased rates that were implemented without advance notice. (Attachment 5)

The Office of Public Counsel proposal seeks to provide advanced notice to Florida ratepayers that will ensure that consumers have adequate notice, in advance, of a price increase. Such notice should allow the consumer to make a knowledgeable decision regarding the continuance of their service contract prior to the implementation of higher rates, or, in the alternative, to seek service from other providers.

The proposed rule would apply only to a price increase of an existing product for existing customers. It would not apply to price increase for new services, new promotions, or price increases that would apply only to new customers.

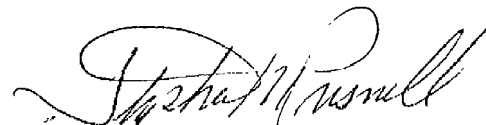
Public Counsel believes the rule is consistent with the goals of a market where companies are free to increase rates and where customers are free to reject such increases. The necessary balance that is needed to achieve an effective market is freedom for the seller to first, change the price, and, second, for the buyer to have sufficient information to make a knowledgeable decision to purchase or reject the offer. Effective markets cannot exist without knowledgeable, informed buyers.

Providing adequate and full disclosure regarding the prices and terms and conditions of service should be a basic obligation of telecommunications companies regulated by the Florida PSC. Disclosure is a cost of doing business in Florida, and the absence of a specific disclosure requirement by this Commission does not make it right. Regarding notice on the outside of the envelope, Public Counsel notes that it is common practice for bills or promotional materials to contain some sort of special notice statements on the outside of the envelope. (See Attachment 6 for examples of envelopes with notices printed on them.)

A well-informed consumer makes for a good customer that is hard to steal away. We believe the proposed rule will create knowledgeable, well-informed customers and that will benefit Florida companies as well as the customers.

Respectfully submitted,

Jack Shreve  
Public Counsel



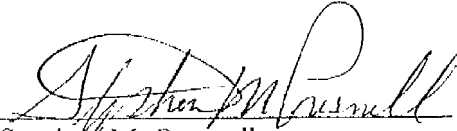
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Associate Public Counsel

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Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

DOCKET NO. 010774-TP  
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by  
U.S. Mail or hand-delivery to the following parties on this 29th day of August,  
2001.



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Tallahassee, FL 32399-0950

# ATTACHMENT 1

# The Critical Elements of a Model Telecommunications Billing Rule

Demetria C. Watts

Truth-in-Billing Work Group  
of the  
NARUC Committee on Consumer Affairs

June 2000



### 3. *Rate Change Notification*

Customers are sometimes unaware that changes in rates or rate plans have occurred and may need this information to evaluate their service. The Vermont Public Service Board issued an order requiring companies to provide a minimum of 30 days advance notice of rate changes “. . . directly to each consumer that may be affected by the change,” with the exception that “. . . companies may provide notice through bill inserts provided that customers are notified at least 15 days in advance of the effective date of the change.”<sup>6</sup> The staff report from the California PUC<sup>7</sup> recommends the adoption of a similar provision with a minimum font size and mailing specifications. UCAN supports this recommendation, but also advocates the use of specific terminology as to what constitutes “sufficient notice”, including the “name and nature of the service” to be increased or decreased, the past rate and the anticipated new rate increase or decrease.<sup>8</sup>

*Conclusion: A model rule that at a minimum requires conspicuous written notification of any changes in rates or calling plans is likely to ensure customers' receipt of timely information of future charges; this will also allow the customer to make informed decisions regarding his or her telephone service.*

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<sup>6</sup>State of Vermont Public Service Board, *Investigation into Service Quality Standards, Privacy Protections, and other Consumer Safeguards for Retail Telecommunications Service*, Docket No. 5903, Order of July 2, 1999, p. 43, as downloaded from: <http://www.state.vt.us/psb/document/5903finalorder.pdf>.

<sup>7</sup>California Public Utilities Commission, *Consumer Protections For a Competitive Telecommunications Industry*, February 3, 2000, p. 19, as downloaded from: [http://www.ucan.org/law\\_policy/teledocs/telco\\_cons\\_protect\\_report.html](http://www.ucan.org/law_policy/teledocs/telco_cons_protect_report.html).

<sup>8</sup>Comments of the Utility Consumers Action Network (UCAN) to the California Public Utilities Commission, *Consumer Protection in Telecommunications Services: The Challenge of Providing Small Customers with Market Information, Access and Redress and Control of Personal Information in an Evolving Industry*, April 17, 2000, p. 105.

## ATTACHMENT 2

-----Original Message-----

From: James Ramsay [mailto:ramsay@naruc.org]  
Sent: Monday, June 04, 2001 2:00 PM  
Subject:

News Release            NARUC Consumer Affairs Committee

Release Date:    June 4, 2001  
Contact:        Brad Ramsay 202.898.2207 or jramsay@naruc.org

#### Customers Receive No Advance Notice of New Billing Charge

A group of state utility regulatory commissioners has gone on record opposing new long distance billing charges and the manner in which they have been imposed on customers. The Consumer Affairs Committee of the National Association of Regulatory Utility Commissioners (NARUC) today sent letters to the nation's major long-distance providers, expressing its concern over the new charge appearing on many telephone customer bills across the country this year and how some long distance companies implemented the charge without notifying their customers. Only AT&T is singled out for praise because the nation's largest long distance carrier gave customers advance notice of the new charge and information on how to avoid pay the monthly fee.

Customers of Sprint and AT&T are now being charged \$1.50 per month if they receive and pay their long-distance charges with their local telephone bill. MCIWorldCom has not instituted this charge on a nationwide basis but is considering such a move. Many customers are uninformed or even unaware of this new charge, making it doubtful they would understand the charge could be avoided by requesting a separate bill or online payment option. The NARUC Consumer Affairs Committee questions the rationale for the need for the separate line item charge and goes on to ask the long-distance companies to do a better job of informing their customers about it. The NARUC members recognized that only AT&T has notified its customers in advance of this change and suggests the companies send customers follow-up information with ways to avoid the new billing charge.

Long-distance companies cite increased costs for billing services provided by former Bell local telephone companies. However, the committee of

state  
commissioners believes that changing costs of doing business cannot  
justify  
a separate line item charge, which it states "amounts to a rate  
increase."  
The NARUC committee further states that it "believes that consumer  
information is vital in a competitive marketplace. Companies should  
compete  
on the basis of business practices and customer relations in addition to  
price."

Some states require individual customer notifications before  
implementing  
new charges such as this on customer bills. However those state  
regulations  
do not necessarily apply to interstate long distance services.

###

James Bradford Ramsay  
General Counsel  
National Association of Regulatory Utility Commissioners  
1101 Vermont Avenue, Suite 200  
Washington, DC 20005

Phone: 202.898.2207  
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## ATTACHMENT 3

STATE OF VERMONT  
PUBLIC SERVICE BOARD

Docket No. 5903

Investigation into Service Quality Standards, )  
Privacy Protections, and other Consumer )  
Safeguards for Retail Telecommunications )  
Service )

Order entered: 7/2/99

PRESENT: George E. Young, Hearing Officer

APPEARANCES: Leslie A. Cadwell, Esq.  
Laura Scanlan Beliveau, Esq.  
for the Vermont Department of Public Service

Thomas M. Dailey, Esq.  
for New England Telephone and Telegraph Company  
d/b/a Bell Atlantic-Vermont

William B. Piper, Esq.  
Primmer and Piper, P.C.  
for Champlain Valley Telecom, Inc.<sup>1</sup>  
Franklin Telephone Company  
Ludlow Telephone Company  
Northfield Telephone Company  
STE/NE Acquisition Corp. d/b/a  
Northland Telephone Company of Vermont  
Perkinsville Telephone Company  
Shoreham Telephone Company  
Topsham Telephone Company  
Waitsfield-Fayston Telephone Company, Inc.  
d/b/a Waitsfield Telecom

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1. At the time of the hearings, Champlain Valley Telecom, Inc. and Waitsfield-Fayston Telephone Company, Inc. were separate entities. Since that time, the two companies have merged into a single entity. The appearances reflect the status at the time of hearings.

These practices are harmful to Vermont consumers. Therefore, I conclude that all customers need to have information on any changes in the price and terms and conditions of service that could increase a customer's costs to the consumer prior to taking service. This notice should be provided individually to consumers far enough in advance of the onset of price increases to allow the customer to explore other options and switch service providers. This practice is also consistent with current Board rulings affecting companies that employ rate bands; the Board recently concluded that these companies should notify their customers of changes to the prices within a rate band at least 30 days in advance of a proposed rate change.<sup>166</sup>

In general, the 30-day notice is reasonable. However, requiring service providers to conduct a separate mailing may increase costs. Therefore, it is reasonable to allow companies that provide notice of rate change through inserts in customer bills to coordinate the notice with the bill, so long as consumers still have sufficient time to evaluate the changed rates, terms and conditions and pursue other options if they find the changes unacceptable. These companies must provide notice at least 15 days prior to the effective date in the change of rates, permitting companies to avoid the cost of separate mailings.<sup>167</sup> Two exceptions to the notice requirement should exist. Companies need not provide advance notice of rate decreases, although the customer's first bill or other material disseminated individually to affected customers shall occur no later than the first bill after the rate decrease. Similarly, if the Board allows a rate increase or a change in terms and conditions that may increase rates to take effect in less than one month, the companies shall provide notice concurrent with the implementation of the changed tariffs.<sup>168</sup> These principles are embodied in the following requirement.

Telecommunications companies shall provide notice of any change in rates or other terms and conditions of service directly to each consumer that may be affected by the change in rates. If the change may increase the cost of service

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166. Docket 5713, Order of 2/4/99 at 49.

167. Today, notice of rate changes for telecommunications providers is often performed by placing notices in newspapers. Newspaper notice, however, is unlikely to reach many, if not most, of a company's affected subscribers. Tr. 5/22/97 at 123-124 (Friar). Such notice does not, therefore, meet the needs of consumers and is not an adequate substitute for individualized notice.

168. Exh. DPS-CP/P-2 at 3.

for a consumer, notice shall be provided at least 30 days in advance of any change in rates or terms and conditions of service, except that companies may provide notice through bill inserts provided that customers are notified at least 15 days in advance of the effective date of the change. If the Board allows a rate increase to take effect on less than 30-days' notice, the companies shall instead provide notice no later than the date on which the change is implemented. In the case of a rate decrease, companies shall notify each affected consumer no later than the first bill following implementation of the rate change.

This recommendation is consistent with Section 225(a), which allows the Board to direct the notice that companies shall provide their customers of rate changes, and thus does not require further rulemaking to be implemented.<sup>169</sup> It ensures adequate notice to consumers. At the same time, it is tailored so that companies need not notify consumers that are unaffected by the rate change.

The advanced notice requirement may reduce the flexibility of companies to rapidly deploy new products. Vermont law, however, already requires that tariff changes be filed at least 45 days in advance of the intended date for implementing service. The advance notice requirement thus should not inhibit companies from changing services.<sup>170</sup> At the same time, it ensures that customers are provided with the information necessary to allow them to make informed choices.

#### f. Fair Marketing Practices

Consumers not only need accurate information, but also should be free from unfair and deceptive practices. All parties agree that companies in the competitive marketplace must engage in honest and fair marketing practices.<sup>171</sup> To implement these principles, the Industry, through Code of Conduct Item A5, proposes that the Board require companies to "engage in honest and fair marketing practices, consistent with all applicable laws and regulations of the

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169. The notice requirement also is consistent with the practices of several other states. For example, New Hampshire requires notice of rate changes no later than 30 days from the date of filing with the Public Utilities Commission. N.H. Code Admin. R. PUC 403.08. See also Or. Admin. R. 860-034-0310.

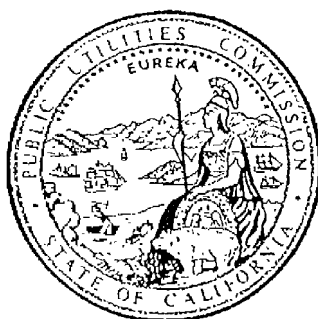
170. It is possible that tariff requirements will be modified or relaxed in the future under 30 V.S.A §§ 226a, 226b, or 227a. If the Board reduces the tariff filing requirements or the review of those tariffs, advance notice to consumers may be the only way by which consumers are notified that rates are changed – until they receive a bill reflecting those changes.

171. Exh. DPS-CP/P-1 at 11; exh. Independents-1 at 6; exh. NYNEX-1 at 11.



## ATTACHMENT 4

**CONSUMER PROTECTIONS  
FOR A  
COMPETITIVE TELECOMMUNICATIONS  
INDUSTRY**



**TELECOMMUNICATIONS DIVISION STAFF REPORT AND  
RECOMMENDATIONS**

February 3, 2000

California Public Utilities Commission

San Francisco, California

[www.cpuc.ca.gov](http://www.cpuc.ca.gov)

229-6846

Email: [consumer-affairs@cpuc.ca.gov](mailto:consumer-affairs@cpuc.ca.gov)

If your complaint concerns interstate or international calls, you should contact the Federal Communications Commission (FCC) at:

Common Carrier Bureau

Consumer Complaints

Mail Stop 1600 A2

Washington, DC 20554"

Rule 7: Late payment, Back-billing, and Prorating of Charges

- a. **Late Payment Charges.** A late payment charge of not more than 1.5% per month may be applied to the undisputed, overdue telephone bill amount. The bill amount becomes overdue when the utility or agent does not receive payment on or before the payment due date. The late payment date shall not be less than 16 days after the bill mailing date. Carriers shall credit payments on the business day payments are received by the carrier or its agent, to avoid assessing late payment charges incorrectly. Late payment charges shall be credited to the customer for amounts that are in dispute. Late payment charges shall not be applied to amounts in dispute that are resolved in the customer's favor.
- b. **Backbilling.** A bill shall not include any previously unbilled charge for intrastate service furnished prior to three months immediately preceding the date of the bill, four months in the case of CMRS "roamer" charges on a foreign system, and five months for collect and 3<sup>rd</sup> party billed calls. A backbilling period of one and one-half years will be permitted in cases involving customer fraud. Customers are permitted a period of three years to seek redress in the case of utility over-billing.
- c. **Prorating Charges.** Carriers shall prorate customer monthly recurring charges for service for partial months. A 30-day month may be used for prorating in lieu of calendar days.

Rule 8: Notices of Change in Service Terms and of Ownership

- a. All affected customers shall be notified of any increase in rates, charges, or change in terms and conditions contained in an agreement that negatively impact the customer, at least 15 calendar days before the change becomes effective, with the exception of mandated fees.
- b. Any notice the carrier sends to customers, or the Commission, shall

be legible and printed in a 10-point type or larger. Such notice shall be sent via first class mail or through electronic means agreeable to the customer. Notice shall contain the carrier's name and "FCC #" or "Cal. PUC U-#".

- c. No change in the rates, terms, and conditions of any service specified in a written contract shall be enforceable unless such change is set forth in writing signed by the customer who signed the original contract, or that customer's duly authorized agent.
- d. Customers shall be notified of any change of ownership of the company providing service to the customer as follows:
  1. The notice shall be in writing.
  2. The carrier shall provide it to customers no later than 30 days before the proposed transfer.
  3. The notice shall contain a straightforward description of the upcoming transfer, any change in the customer's service agreement, a statement of the customer's right to switch to another carrier, and a toll-free telephone number for questions.

#### Rule 9: Service Termination and Notice

- a. Any deposits, less the undisputed amount of any unpaid bills for service furnished by the carrier, shall be refunded within 30 days after the discontinuance of service, or after one year if applicant has established a record of payment in compliance with the carrier's terms, whichever is earlier.
- b. Notices to terminate service for nonpayment of bills shall be provided in writing to the customer not less than 7 calendar days prior to termination, with the exception of termination for customer acts of fraud.
- c. Carriers may not disconnect local exchange or long distance telephone service for failure to pay disputed charges for "information services" (non-telecommunications related services) or separately billed charges of other telephone companies, pursuant to P.U. Code Sections 2884 – 2882.6 and 2889 – 2889.2.
- d. Each notice of termination shall include all of the following information:
  1. Carrier's name and "FCC #" or "Cal. PUC U-#".
  2. The name and address of the customer whose account is delinquent.
  3. The amount that is delinquent.
  4. The date when payment or arrangements for payment are required in order to avoid termination.
  5. The toll-free telephone number of a representative of the carrier who can provide customer assistance.
  6. The utility procedure the customer may use to initiate a complaint or to request an investigation concerning

## ATTACHMENT 5

Search Result

Rank 9 of 57

Database  
GALE-NEWS

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(THIS IS THE FULLTEXT)

T&amp;T Suspends Rate Increases in Oklahoma.

Network Briefing

pNA

Sept 27

1999

SSN: 1360-1369

Language: English

Record Type: Fulltext

Document Type: Magazine/Journal

Trade

Word Count: 253

EXT:

AT&T Corp has tried to win over angry customers in Oklahoma who found the company had increased the tariff for in-state calls up to sixty days before they received notice of the tariff changes. The increases ranged from between 20% and 100% depending on what calling plan the AT&T customer was on. According to AT&T the average customer saw in-state long distance calls raised by an average of 30%. AT&T said that it had intended to warn its customers before the rate increase but took too long printing and posting the rate change information.

The increase began July 8 and resulted in hundreds of complaints to the Oklahoma Corporation Commission (OCC). Although the state regulator decided against fining AT&T for the billing without warning, it has tightened up regulations on when operators must inform their customers of rate increases. Whereas before the regulations had only stipulated that warnings should be given as soon as possible, now carriers must ensure that notification has been received before the rates are increased. T&T, which says the rate hike was the first in seven years in the state, apologized for the late notification and said that in future it could notify customers in advance or at the time of any rate changes. It will not issue refunds to customers for the increased call charges but says it will hold back the rate increase over the next two months returning them to the previous level for the months for October and November.

THIS IS THE FULL TEXT: COPYRIGHT 1999 ComputerWire Inc. Subscription: GBP 495/year. Published 260 times per year. Contact APT Data Group, 12 Sutton Row, 4th floor, W1V 5FH, UK. Phone 44-171-208-4200. Fax 44-171-439-1105.

PUBLISHER NAME: ComputerWire, Inc.

COMPANY NAMES: \*AT and T Corp.

SUBJECT NAMES: \*743 (Consumer prices); 290 (Public affairs)

GEOGRAPHIC NAMES: \*1U7OK (Oklahoma)

PRODUCT NAMES: \*4811000 (Telephone Service)

INDUSTRY NAMES: BUSN (Any type of business); CMPT (Computers and Office Automation); INTL (Business, International)

AICS CODES: 51331 (Wired Telecommunications Carriers)

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## ATTACHMENT 6

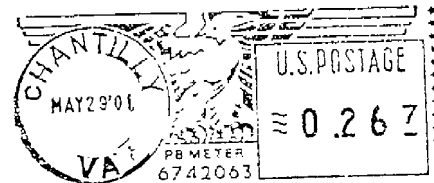


The point of contact<sup>SM</sup>

P.O. Box 569740, Dallas, TX 75356-9740

RETURN SERVICE REQUESTED

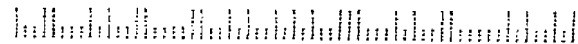
PRESORTED  
FIRST CLASS



DS 341 PRSRT FCM SUB MD 208

Confirmation  
materials enclosed.

AUM3



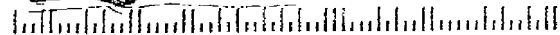




P.O. Box 944080  
Maitland, FL 32794-4080

FORWARDING SERVICE REQUESTED

\*AUTO\*\*5-DIGIT 32312



PRESORTED  
STANDARD  
U.S. POSTAGE  
PAID  
AT&T

ATTENTION: Important information  
concerning your AT&T service enclosed.

**DORIS MALOY**  
Leon County Tax Collector  
PO Box 1835  
Tallahassee, FL 32302

First Class Presort  
U.S. Postage Paid  
CASS Data & Mailing

**Important!**  
Registration Renewal Notice Inside



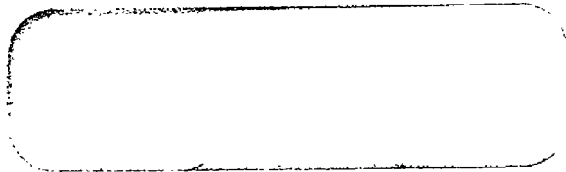
The Delta SkyMiles<sup>®</sup> Credit Card

*from American Express*

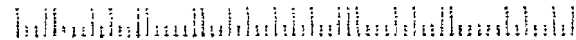
P.O. Box 297874, Ft. Lauderdale, FL 33329-7874

Presorted  
First Class Mail  
U.S. Postage Paid  
American Express

**Your Statement Is Enclosed**



AUP1





Citibank  
 P.O. Box 6660  
 The Lakes, NV 88901-6660  
 USA

PRESORTED  
 FIRST-CLASS MAIL  
 U.S. POSTAGE  
 PAID  
 CITIBANK

Statement enclosed

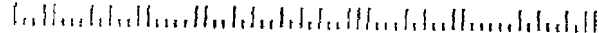
For All Occurrences: The event of involuntary unemployment, hospitalization, disability, or Family Leave must begin on or after the date on which your Account was enrolled in Coverage Credit Protector. Your Certificate of Enrollment will contain your date of enrollment. You must also notify us of the event no later than 90 days after its occurrence. You must provide written verification of the event.

Household Members: You may also activate your Citibank Credit Protector benefits if the person in your household with the highest employment income becomes involuntarily unemployed, disabled, hospitalized, or takes Family Leave. Such person must meet all conditions stated in the Terms & Conditions provided in the enrollment package.

Cost: The monthly fee for Citibank Credit Protector is \$94 per \$100 of your average daily balance, with a maximum monthly fee of \$1,500. This fee will be charged to your enrolled Account.

Conditions provided:  
 Certain conditions mean for at least 30 days due to a medical labor dispute or at labor dispute or at Protector benefits. If Protector benefits are deferred, you will receive, and no monthly ("Account") for a payment. In return.

0123456789

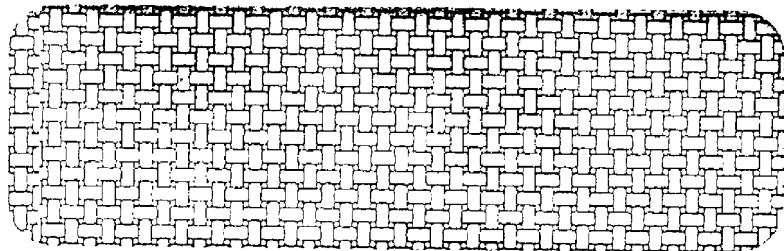
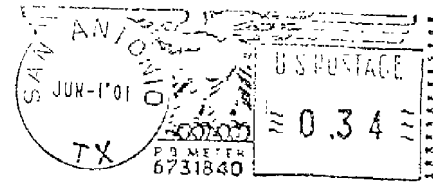




9800 Fredericksburg Road  
San Antonio, Texas 78238

Important — Open Immediately

Processed by  
ID #216



22212-3403 5B

