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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications,) Docket No.: 060476-TL
Inc. to Initiate Rulemaking to Amend Rules)
25-24.630(1) and 25-24.516(1), Florida)
Administrative Code)
_____) March 30, 2007

AT&T FLORIDA'S RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S FIRST DATA REQUEST

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Response to the Staff of the Florida Public Service Commission's ("Staff") First Data Request, dated March 19, 2007.

GENERAL OBJECTIONS

1. AT&T FLORIDA objects to the Discovery to the extent it seeks to impose an obligation on AT&T FLORIDA to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. AT&T FLORIDA objects to the Discovery to the extent it is intended to apply to matters other than those subject to the jurisdiction of the Commission. AT&T FLORIDA objects to such requests as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T FLORIDA objects to each and every Discovery request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

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4. AT&T FLORIDA objects to each and every Discovery request insofar as the requests are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these data requests. Any answers provided by AT&T FLORIDA in response to the requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T FLORIDA objects to each and every Discovery request insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

6. AT&T FLORIDA objects to providing information to the extent that such information is already in the public record before the Commission or already in the possession of Staff.

7. AT&T FLORIDA objects to the Discovery requests, instructions and definitions, insofar as they seek to impose obligations on AT&T FLORIDA that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

8. AT&T FLORIDA objects to each and every Discovery request that are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T FLORIDA is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T FLORIDA creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. AT&T FLORIDA will conduct a search of those files that are

reasonably expected to contain the requested information. To the extent that the requests purport to require more, AT&T FLORIDA objects on the grounds that compliance would impose an undue burden or expense.

10. AT&T FLORIDA objects to each and every Discovery request to the extent that the information requested constitutes "trade secrets" pursuant to Florida Statutes. To the extent that Staff requests proprietary confidential business information, AT&T FLORIDA will make such information available upon execution and in accordance with a protective agreement, subject to any other general or specific objections contained herein.

11. AT&T FLORIDA objects to any Discovery request that seeks to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by AT&T FLORIDA in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

Specific Responses

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REQUEST: Please provide a written response and supporting documentation by March 26, 2007, that demonstrates the cost to complete each of the following non-inmate intrastate telephone toll calls:

1. 0+ automated non-person-to-person call for a fifteen (15) minute duration.
2. 0+ automated person-to-person call for a fifteen (15) minute duration.
3. 0+ operator assisted non-person-to-person call for a fifteen (15) minute duration.
4. 0+ operator assisted person-to-person call for a fifteen (15) minute duration.

RESPONSE: AT&T Florida does not have a recent cost study specifically designed to capture the costs of its retail operator services, and it would take several months to develop such a cost study. However, in an attempt to respond to staff's data request, AT&T Florida made some adjustments to its latest TSLRIC wholesale cost study to reflect retail specific costs such as labor rates, work times, etc. Based on this adjusted cost study, listed below are the average costs per call associated with the different call types. It is important to note, that the study used average call volumes which included wholesale as well as retail call volumes, which are considerably lower than wholesale call volumes.

Moreover, as pointed out in AT&T Florida's Post-Workshop Comments, Operator Services was originally established to help customers complete long distance calls and to provide alternative billing options for completing calls for the following types of calls: collect, third number billing, calling card or credit card. However, Operator Services has now evolved into more of a "help desk" function, where customers call and inquire on how to perform the following functions: contact repair services, the business office, or their long distance carrier or how to navigate through automated systems. AT&T Florida has found that there are fewer call completion requests and, more importantly, that approximately one out of every seven calls to its Operator Services is a billable call.

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RESPONSE: (Cont.)

Documents that support the operator services costs discussed below are proprietary and are being provided subject to a Notice of Intent.

1. 0+ automated non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is \$.1038 per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be \$.40 (\$.02640 x 15 min).

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for automated non-person to person is approximately \$.7266 per call plus approximately \$.40 for the toll portion of the call.

2. 0+ automated person-to-person call for a fifteen (15) minute duration.

AT&T Florida does not provide this type of call.

3. 0+ operator assisted non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is \$.4155 per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be \$.40 (\$.02640 x 15 min).


As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for non-person-to-person is approximately \$2.9085 per call plus approximately \$.40 for the toll portion of the call.

Respectfully submitted this 30th day of March, 2007.

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



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¹ The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

AT&T FLORIDA
FL PSC Dkt. No. 060476-TL
Staff's First Data Request
March 19, 2007
Item No. 1
Attachment

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PROPRIETARY

3/28/2007

Recurring Cost Summary

BellSouth
 OPH - NON PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
 (Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>		<u>Volume Insensitive</u>	
		<u>Direct Cost</u>		<u>Direct Cost</u>
Recurring Cost Development Reports		\$0.0372		\$0.0141
LABOR EXPENSES:				
OPERATOR LABOR		\$0.2477		\$0.0000
BST LIDB - ADMIN.		\$0.0009		\$0.0000
BST LIDB - FRAUD CENTER		\$0.0053		\$0.0000
OTHER EXPENSES:				
OPERATOR LAND & BUILDING		\$0.0297		
LIDB		\$0.0094		\$0.0000
Cost Subtotal (Including Shared Cost)		<u>\$0.3302</u>		<u>\$0.0141</u>
Gross Receipts Tax Factor	X	<u>1.0020</u>	X	<u>1.0020</u>
TSLRIC		\$0.3309		\$0.0141
TOTAL TSLRIC		\$ 0.3450		
Overhead Loading Factor		1.2042		
TOTAL COSTS W/OVERHEAD		\$ 0.4155		

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3/28/2007

Recurring Cost Summary

BellSouth
 OPH - PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
 (Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>		<u>Volume Insensitive</u>	
		<u>Direct Cost</u>		<u>Direct Cost</u>
Recurring Cost Development Reports		\$0.0372		\$0.0141
LABOR EXPENSES:				
OPERATOR LABOR		\$0.4208		\$0.0000
BST LIDB - ADMIN.		\$0.0009		\$0.0000
BST LIDB - FRAUD CENTER		\$0.0053		\$0.0000
OTHER EXPENSES:				
OPERATOR LAND & BUILDING		\$0.0504		
LIDB		\$0.0094		\$0.0000
Cost Subtotal (Including Shared Cost)		<u>\$0.5241</u>		<u>\$0.0141</u>
Gross Receipts Tax Factor	X	<u>1.0020</u>	X	<u>1.0020</u>
TSLRIC		\$0.5251		\$0.0141
TOTAL TSLRIC		\$ 0.5393		
Overhead Loading Factor		1.2042		
TOTAL COSTS W/OVERHEAD		\$ 0.6494		

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3/28/2007

Recurring Cost Summary

BellSouth
MAH MACHINE HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>		<u>Volume Insensitive</u>	
		<u>Direct Cost</u>		<u>Direct Cost</u>
Recurring Cost Development Reports		\$0.0609		\$0.0141
LABOR EXPENSES:				
OTHER EXPENSES:				
LIDB		\$0.0111		\$0.0000
Cost Subtotal (Including Shared Cost)		\$0.0720		\$0.0141
Gross Receipts Tax Factor	X	1.0020	X	1.0020
TSLRIC		\$0.0721		\$0.0141
TOTAL TSLRIC		\$ 0.0862		
Overhead Loading Factor		1.2042		
TOTAL COSTS W/OVERHEAD		\$ 0.1038		

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