

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** March 5, 2008  
**TO:** Ann Cole, Commission Clerk - PSC, Office of Commission Clerk  
**FROM:** Frank Trueblood, Regulatory Analyst II, Division of Competitive Markets & Enforcement  
**RE:** Docket No. 050863-TP, dPi Teleconnect, L.L.C. v. BellSouth Telecommunications, Inc.

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I request that your office add the attached correspondence to the above-referenced docket. A copy of these documents were sent electronically to staff counsel but not filed with your office.

- October 8, 2007 letter from Christopher Malish, Foster Malish and Blair, L.L.P., to Manuel A. Gurdian, and transmittal email from Jennifer Washington dated October 18, 2007.
- October 19, 2007 letter from J. Phillip Carver, AT&T Florida, to Christopher Malish.
- October 29, 2007 letter from J. Phillip Carver, AT&T Florida, and transmittal email from Brenda Slaughter dated the same.

Should you have any questions, please contact me at (850) 413-7019 or [frtrueblo@psc.state.fl.us](mailto:frtrueblo@psc.state.fl.us)

/ft

cc: Lee Eng Tan, Senior Attorney, Office of the General Counsel

Attachments

DOCUMENT NUMBER-DATE

01662 MAR-5 08

FPSC-COMMISSION CLERK

## Frank Trueblood

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**From:** Jennifer Washington [jennifer@fostermalish.com]  
**Sent:** Thursday, October 18, 2007 1:20 PM  
**To:** mg2708@att.com  
**Cc:** pc0755@att.com; Lee Eng Tan; Malish, Chris; Steven Tepera  
**Subject:** FL Docket No. 050863-TP; dPi v. BellSouth

**Attachments:** Gurdian Ltr 10-18-07.pdf



Gurdian Ltr  
-18-07.pdf (41 kb)

Dear Counsel:

Please see attached letter. Thank you.

<<Gurdian Ltr 10-18-07.pdf>>

Jennifer L. Washington, CP  
Paralegal  
Foster Malish Blair & Cowan, LLP  
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1

01662 MAR-5 8

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chrismalish@fostermalish.com

October 8, 2007

**Via fax, First-Class mail,  
and email: mg2708@att.com**

Manuel A. Gurdian, Attorney  
AT&T Florida  
150 South Monroe Street, Room 400  
Tallahassee, Florida 32301

Re: Docket No. 050863-TP; *dPi Teleconnect, L.L.C. v. BellSouth Telecommunications, Inc.*  
before the Florida Public Service Commission

Dear Manny:

On October 8 I wrote in response to your email regarding Steven Tepera's inquiry about the spreadsheet you all sent us in response to our RFI 1-19. To date we have neither received any of the clarification requested, nor any indication that the clarification would or would not be forthcoming. Could you please check on this for us? Basically, we just need to make sure both sides understand what information is contained in AT&T's response to 1-19.

If you recall, we asked among other things that you please send us an explanation and/or key explaining:

- (1) in general, what AT&T contends the spreadsheet is showing (e.g., "every one of these orders shows an instance where a retail customer orders new basic service with two or more of the blocks .....");
- (2) the information AT&T believes is reflected under each of the columns (an explanation of the headings);
- (3) what it means if there is a blank as opposed to an entry in a particular place (does it always mean the same thing? Could it mean more than one thing? E.g., "the fact that there is a blank in the Account Waiver Code Column does not necessarily mean that nothing was waived, just that there was not a code for the waiver" ); and

DOCUMENT NUMBER-DATE

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(4) the acronyms used in the spreadsheet.

Representative pages were attached for your reference, so that you wouldn't have to pull up the entire 600 page spreadsheet.

Please call if you have any questions or concerns; we look forward to your response.

Very truly yours,

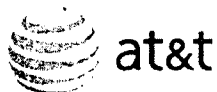


Christopher Malish

cc: via First Class mail, and via electronic mail: pc0755@att.com  
J. Phillip Carver, Sr. Attorney  
AT&T Southeast  
675 West Peachtree Street, Suite 4300  
Atlanta, Georgia 30375  
via First Class mail, and via electronic mail: ltan@psc.state.fl.us

Lee Eng Tan, Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Brian Bolinger, via electronic mail



J. Phillip Carver  
Senior Attorney  
Legal Department

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T: 404.335.0710  
F: 404.614.4054  
j.carver@att.com

October 19, 2007

**VIA U.S. MAIL AND  
ELECTRONIC MAIL**

Christopher Malish  
Foster Malish Blair & Cowan LLP  
1403 West Sixth Street  
Austin, TX 78703


Re: **Docket No. 050863-TP: dPi Teleconnect, L.L.C. v. BellSouth  
Telecommunications, Inc.**

Dear Chris:

This letter is in response to the letter that you transmitted electronically to Manny Gurdian yesterday, October 18, 2007 (which was dated October 8, 2007). The written questions that you sent us on October 8 are, for all practical purposes, interrogatories. As you know, the discovery period in Florida is over, so AT&T is under no obligation to respond to these questions. Nevertheless, I am willing to do so as a courtesy<sup>1</sup>.

However, I do not think it is reasonable for you to expect information produced under these circumstances to be conveyed on a more expedited basis than it would be if it were in response to authorized discovery. Therefore, my intention is to respond to your questions within twenty (20) days, just as I would if they were authorized discovery. Thus, you can expect a response on approximately Monday, October 29, 2007.

Sincerely,



J. Phillip Carver

cc: Lee Eng Tan (via Electronic Mail)  
Manuel A. Gurdian (via Electronic Mail)

<sup>1</sup> Of course, by doing this, I am not waiving the right to refuse to answer any other unauthorized discovery requests that you may send in the future.

**Frank Trueblood**

**From:** Slaughter, Brenda [bs3843@att.com]  
**Sent:** Monday, October 29, 2007 3:06 PM  
**To:** Lee Eng Tan  
**Cc:** Woods, Vickie; Carver, J; Smith, Debbie N.  
**Subject:** Docket 050863-TP  
**Attachments:** 050863-TP Response to dPi Oct 8 letter.pdf

Please find attached a copy of the response to dPi letter of October 8, 2007. The letter will be sent to Mr. Malish by First Class U.S. Mail.

Brenda Slaughter (sent on behalf of J. Phillip Carver)  
Legal Assistant  
AT&T Southeast  
Suite 4300  
675 W. Peachtree Street  
Atlanta, GA 30375-0001  
Phone: (404) 335-0714

<<050863-TP Response to dPi Oct 8 letter.pdf>>

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DOCUMENT NUMBER-DATE

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3/5/2008



J. Phillip Carver  
Senior Attorney  
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T: 404.335.0710  
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October 29, 2007

Christopher Malish, Esq.  
Foster Malish & Blair, L.L.P.  
1403 West Sixth Street  
Austin, TX 78703

Re: Docket No. 050863-TP: dPi Teleconnect , L.L.C. v. BellSouth  
Telecommunications, Inc. before the Florida Public Service Commission

Dear Chris,

In response to your letter, dated October 8, 2007, AT&T Florida provides below the answers to your questions regarding the information produced in response to dPi's Request No. 1-19. As an initial matter, you state in the letter that dPi is seeking information regarding initial service orders. That is what AT&T produced. The information is not, as you appear to believe, a record of monthly recurring activity for subscribers to service consisting of IFR + blocks. (See, pp. 1-2). Again, these are only the initial orders. Beyond this, the specific answers to your questions are as follow:

- (1) **[I]n general, what AT&T contends the spreadsheet is showing (e.g., "every one of these orders shows an instance where a retail customer orders new basic service with two or more of the blocks.....")**

**AT&T Response:** The spreadsheet provided to dPi on September 26, 2007 identifies each new order AT&T received from January 2005 through August 2007 that had a basic residential line and at least 2 of the 3 requested call blocks (BCR, BRD and/or IIBG). Some of these orders also included features, in addition to blocks, and this information is provided as well.

AT&T was able to identify new orders because AT&T utilizes an order number naming nomenclature that aligns with the activity being performed. Order numbers beginning with an "N" indicate a "new account" and are used anytime a billing account is being established. This may include either a brand new account (e.g. new customer, split billing of existing account, or reacquisition/win over) or the re-establishment of a previously disconnected account (e.g. disconnection in error, re-establishment after force majeure, re-establishment following disconnect for non-pay).

DOCUMENT NUMBER-DATE

01662 MAR-5 8

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Not all new orders are reacquisitions. Further, AT&T has not yet been able to determine which of the new orders are submitted by reacquisition or win-over customers. We have produced all new orders because that is what you requested. However, the new orders that were not submitted by reacquisition or win over customers are not part of the universe of retail orders that would qualify for the Line Connection Charge Waiver.

The spreadsheet also identifies whether the order has a waiver code to waive certain non-recurring charges, and includes a partial listing of certain Touchstar services or custom calling features that were identifiable on the service order. Waiver codes may be listed multiple times for a particular service order, but will only be applied once for the entire service order. In the event the waiver code is placed in the Bill Section, that code will appear in the Account Waiver Code column adjacent to every appearance of the order number, regardless of whether that waiver code applies to that particular nonrecurring charge on the service order. For example, "WSO" only waives the line connection charge or the secondary service order charge, but does not waive any other nonrecurring charges.

Finally, the spreadsheet provides a column that identifies the recurring charges associated with a particular service or feature. In some instances, blanks appear in this column. The reasons for these blanks are explained below.

**(2) [T]he information AT&T believes is reflected under each of the columns (an explanation of the headings);**

**AT&T Response:** Several of the column headings include the term "USOC," which stands for "Uniform Standard Ordering Code". AT&T utilizes USOCs for ordering different services and features and each service and feature is assigned a unique identifying USOC.

The following is an explanation of each column heading:

- Month/Year:.....Lists the Month and Year of a particular service order
- Account Number:.....Lists the Account Number associated with the service order
- BCOS:.....Means "Basic Class of Service" and identifies the specific USOC that the customer ordered. This column includes only basic residential USOCs.
- Order Number:.....Provides the service order number. All service orders listed are "N" orders (i.e., new accounts). These represent customers who are establishing a new billing arrangement with AT&T. As mentioned above, AT&T is not able to separately identify reacquisition and win-over customers in this list.
- ADDED Blocked
- USOC Combination:.....Lists 2 or 3 of the specific Call Blocks that were present on the service order. The specific USOCs are BCR, BRD and/or IIBG.
- Account Waiver Code:.....Identifies whether a particular waiver code was entered into the bill section of the service order. (See Note Below.)



Service or Feature USOC.....Lists certain USOCs, either services or features, included in the service order.  
USOC Waiver Code.....Identifies whether a particular waiver code was associated with a particular USOC on the service order.  
USOC Revenue.....Provides the monthly recurring charges associated with each individual USOC.

Nonrecurring charges can be waived by either of the following methods: an entry in the bill section of the order or an entry immediately adjacent to a particular USOC. Use or placement of certain waiver codes has the same practical effect, regardless of where it is placed on the service order. A description of waiver codes is below.

**(3) [W]hat it means if there is a blank as opposed to an entry in a particular place (does it always mean the same thing? Could it mean more than one thing? E.g., “the fact that there is a blank in the Account Waiver Code Column does not necessarily mean that nothing was waived, just that there was not a code for the waiver”);**

**AT&T Response:** There are two separate reasons that blanks appear on the provided spreadsheet. Some blanks are associated with the waiver code columns (both the Account Waiver Code column and the USOC Waiver Code column). Blanks also appear in the USOC Revenue column. AT&T will address these separately.

Under the Account Waiver Code column and the USOC Waiver Code column, a blank means that non-recurring charges were not waived. If there is an entry in the column, it means that certain non-recurring charges were waived. As discussed above, in the event the waiver was entered into the bill section that code will appear in the Account Waiver Code column adjacent to every appearance of the order number, regardless of whether that waiver code applies to that particular nonrecurring charge.

As to the second type of blank, the “USOC Revenue” column is populated with data drawn from a static table within the database that is refreshed at the end of each month. This was the only method by which AT&T could be responsive to dPi’s request for recurring charges. This column matches the USOC listed in the “Service or Feature USOC” column from a particular service order with the monthly snapshot of the charges associated with the account number provided on the service order. If the USOC listed in the “Service or Feature USOC” column is no longer included in the billing data field in the static table, the system produces a blank (i.e., \$ -). This occurs when a customer establishes service on a particular day and then subsequently changes the ordered services/features (on a separate billing order). This type of change will eliminate or remove the type of service being billed, and thus nullify the services/features included in the initial “N” order.

**(4) [T]he acronyms used in the spreadsheet.**

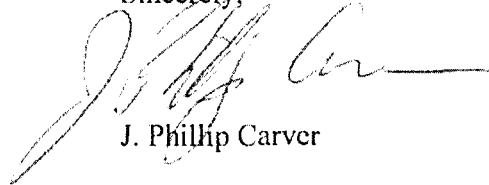
Below is a chart of each acronym that is included in the spreadsheet and the description of the acronym

<u>Acronym</u>	<u>Description of Acronym</u>
IFR	Flat rate line, residence
IFRCL	Flat rate line, residence with Caller ID
999VM	BellSouth Essentials, Credit Plan with BellSouth Voice Mail
BCR	TouchStar, call return, usage based blocking
BRD	TouchStar, repeat dialing, usage based blocking
BSCOS	Basic Class of Service
BVMRP	BellSouth Voice Mail, Residential Premium Mailbox
BVMRV	BellSouth Voice Mail, each mailbox
DRS	RingMaster Service, residence and business RingMaster I
DRS1X	RingMaster Service, residence and business RingMaster II, first additional telephone number with distinctive ringing, per line
DRS2X	RingMaster Service, residence and business RingMaster II, second additional telephone number with distinctive ringing, per line
ESC	Three way calling (non-packaged)
ESL	Speed calling (8 code) (non-packaged)
ESM	Activation/deactivation of call forwarding (non-packaged)
ESX	Call Waiting, per line,
ESXD9	Call Waiting, per line, deluxe, with conferencing, for Call Forward don't answer subscribers
ESXDC	Call Waiting, per line, deluxe, with conferencing
GCE	Call forwarding busy line, per CO line equipped
GCJ	Call forwarding don't answer, per CO line equipped
GCJRC	Call forwarding don't answer, per CO line equipped ring control
GCZ	Call forwarding, variable, remote activation, per line equipped
IIBG	Denial of call tracing, per activation (where universal call tracing is activated)
IIBY	Anonymous call rejection, per line
MBBRX	MemoryCall Answering Service, residence per month, each mailbox
MWW	Message waiting indication
MWWAV	Message waiting indication audio/visual
NSD	Caller ID, basic, number delivery, per line
NSQ	Repeat Dialing
NSS	Call Return, per line
NST	Call Tracing, per line
NSY	Call Block, per line
NXMCR	Caller ID Deluxe (name and number delivery), per line with Anonymous Call Rejection (ACR)

<u>Acronym</u>	<u>Description of Acronym</u>
PMXIR	Privacy Director(r) Service, residence, per line
USOC	Uniform Service Ordering Code
WLC	Waives only the Line Connection Charge
WNR	Waives all Non-Recurring Charge
WSO	Waives the Line Connection Charge or the Secondary Service Charge
VR5	Area Plus Service, residence, 40 mile radius (FL)
VR5CL	Area Plus Service, residence, 40 mile radius (FL) with Caller ID

I believe that the foregoing addresses all of your questions.

Sincerely,



J. Philip Carver

cc: Lee Eng Tan