

Eric Fryson

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Wednesday, March 14, 2012 3:58 PM
To: Filings@psc.state.fl.us
Subject: 110303-OT AT&T Florida's Resp. to Staff's Data Request for Regulatory Assessment Fee, Customer Complaints for Lifeline customers and Customer Complaints for relay service

Attachments: Document.pdf



Document.pdf
(6 MB)

A. Vickie Woods
BellSouth Telecommunications, LLC d/b/a AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560

vf1979@att.com<mailto:vf1979@att.com>

B. Re: Docket No. 110303-OT - Section 120.745, F.S. (2011), Legislative review of agency rules in effect on or before November 16, 2010

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida
on behalf of Tracy W. Hatch

D. 51 pages total (includes letter and Responses)

E. Responses to Staff's Data Request for Regulatory Assessment Fee, Customer Complaints for Lifeline customers and Customer Complaints for Relay Service.

.pdf

DOCUMENT NUMBER-DATE
01521 MAR 14 2012
FPSC-COMMISSION CLERK



Tracy W. Hatch
General Attorney

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

T: (850) 577-5508
thatch@att.com

March 14, 2012

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

Re: Docket No. 110303-OT – Section 120.745, F.S. (2011), Legislative review of agency rules in effect on or before November 16, 2010

Dear Ms. Cole:

Enclosed are Responses to Staff's data requests for Relay provider, Lifeline provider and for the Regulatory Assessment Fee in the captioned docket. The responses for these data requests are for the following certificated companies, collectively AT&T: AT&T Communications of the Southern States, LLC; BellSouth Long Distance, Inc. d/b/a AT&T Long Distance; BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast; BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast; Centennial Florida Switch Corp and TCG South Florida for Regulatory Assessment Fee request. BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast for Customer Complaints for Lifeline customers and AT&T Corp. for Customer Complaints for relay service.

Sincerely,



Tracy W. Hatch

Enclosures

Cc: Laura V. King (via electronic mail)
Jessica Miller (via electronic mail)

Regulatory Assessment Fee Request

REQUEST: What are the estimated transactional costs resulting from the Company's compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

- a. What are your actual transactional costs resulting from your Company's compliance with Rule 25-4.0161, F.A.C., for the period July 1, 2011 through December 31, 2011?

RESPONSE: AT&T estimates the costs to comply with rule 25-4.1061, F.A.C., Regulatory Assessment Fees for the five year period beginning July 1, 2011 to be approximately \$40,000. This estimate includes the costs for all AT&T entities required to file Florida Regulatory Assessment Fee Returns.

- a. AT&T does not separately track or identify the actual transactional costs incurred to comply with Rule 25-4.0161, F.A.C. AT&T estimates the cost for the period July 1, 2011 through December 31, 2011 to be approximately \$4,000.

Responsible Person: Ron Hilyer

NOTE: The responses for this data request and all following data requests are for the following certificated companies, collectively AT&T:
AT&T Communications of the Southern States, LLC. d/b/a (TA062)
BellSouth Long Distance, Inc. d/b/a AT&T Long Distance (TX137)
BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast(TL720)
BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast(TX031)
Centennial Florida Switch Corp (TX473)
TCG South Florida (TA032))

REQUEST: What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1,2011?

RESPONSE: AT&T estimates that the likely impact in terms of costs and/or benefits on small business to be *de minimis* for the five year period beginning July 1, 2011.

Responsible Person: Greg Follensbee

REQUEST: What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the likely impact in terms of costs and/or benefits on small business and small cities to be *de minimis* for the five year period beginning July 1, 2011.

Responsible Person: Greg Follensbee

REQUEST: What is your estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the likely impact in terms of costs and/or benefits on entities located in the Company's service territory to be *de minimis* for the five year period beginning July 1, 2011.

Responsible Person: Greg Follensbee

REQUEST: What expected impact do you believe Rule 25-4.0161, F.A.C., will have on economic growth, private sector job creation or employment, and private sector investment for the five year period July 1, 2011 in the Company's service territory?

RESPONSE: AT&T estimates that the likely impact on economic growth, private sector job creation or employment and the private sector to be *de minimis* for the five year period beginning July 1, 2011.

Responsible Person: Greg Follensbee

REQUEST: What expected impact do you believe Rule 25-4.0161, F.A.C., will have on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period July 1, 2011 ?

RESPONSE: AT&T estimates that the impact on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation to be *de minimis* for the five year period beginning July 1, 2011.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-4.0161 F.A.C.
1st Set Data Request
March 14, 2012
Item No. 7
Page 1 of 1

REQUEST: What are the benefits to your Company associated with Rule 25-4.0161,
F.A.C.?

RESPONSE: AT&T believes the main benefit of Rule 25-4.0161 is setting the appropriate
regulatory assessment fee rate to insure the Commission is staffed to handle
the duties and responsibilities directed by chapter 364.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-4.0161 F.A.C.
1st Set Data Request
March 14, 2012
Item No. 8
Page 1 of 1

REQUEST: Since the December 4, 2011 rule change has your Company revised customer rates in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any rate changes that were made.

RESPONSE: No.

Responsible Person: Greg Follensbee

REQUEST: If the Company did revise customer rates after the rule change, what were the specific costs associated with processing and implementing these rate changes?

RESPONSE: Not Applicable

Responsible Person: Greg Follensbee

REQUEST: Does the Company anticipate having to revise customer rates in the future in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

RESPONSE: Presuming there are no changes to Rule 25-4.0161 F.A.C. in the five year period beginning July 1, 2011, no.

Responsible Person: Greg Follensbee

REQUEST: If the company anticipates revising customer rates in order to comply with Rule 25-4.0161, F.A.C., what costs does the company expect to incur to process and implement the rate changes for the five year period beginning July 1, 2011?

RESPONSE: Not Applicable

Responsible Person: Greg Follensbee

Customer Complaints for Lifeline Customers

- REQUEST: What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011?
- a. For the five year period beginning July 1, 2011, which requirements of Rule 25-22.032, F.A.C., if any, would be performed by the Company assuming the rule were not in effect? Please explain.
 - b. For each of the requirements identified in 1 a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011?
 - c. What are your actual transactional costs resulting from your Company's compliance with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011?

- RESPONSE: BellSouth Telecommunications, LLC d/b/a AT&T Florida d/b/a AT&T Southeast ("AT&T") estimates its transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011 to be *de minimis*, given that the only customers subject to the rule are Lifeline customers and given the low number of Lifeline customer complaints that AT&T has had to address since July 1, 2011.
- a. AT&T would continue to receive regarding Lifeline customer complaints either directly from the customer or from other state or federal agencies, address and investigate the complaint, and resolve the complaint in a timely manner. Pending the investigation of the complaint, AT&T would suspend any collection efforts against a customer until the complaint was resolved. AT&T would continue to comply with any FCC requirements concerning Lifeline customers and their treatment pending resolution of the complaint.
 - b. The estimated transactional costs are *de minimis*.
 - c. Due to the small number of complaints, AT&T is unable to quantify the actual transactional costs it incurs to comply with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011 to be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011 to be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July I, 2011?

RESPONSE: AT&T estimates the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July I, 2011 to be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the company's service territory?

RESPONSE: The expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the company's service territory is *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

RESPONSE: The expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets is *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe are the benefits of Rule 25-22.032, F.A.C.?

RESPONSE: AT&T sees little benefit in rule 25-22.032, but given the *de minimis* cost AT&T estimates that it will incur to comply; AT&T is not recommending that the rule be repealed at this time.

Responsible Person: Greg Follensbee

REQUEST: Assuming Rule 25-22.032, F.A.C., is unchanged over the next five years, do you expect your Company's costs to comply with the rule going forward, to increase, decrease, or remain the same. Please explain your response.

RESPONSE: AT&T expects the costs to either remain the same or decrease, since AT&T continues to see its number of Lifeline customers reduced as eligible Lifeline customers choose other Eligible Telecommunications Carriers to meet their needs.

Responsible Person: Greg Follensbee

REQUEST: Does your Company currently have procedures/personnel in place to address complaints received directly from your consumers?

RESPONSE: Yes

Responsible Person: Greg Follensbee

REQUEST: If Rule 25-22.032, F.A.C., were repealed would your Company continue to accept and address consumer complaints? Please explain your response.

RESPONSE: Yes. AT&T would continue to accept and address consumer complaints from its Lifeline customers. AT&T strives to provides the highest quality of service to all of its customers and will address and strives to resolve any issues its customer bring to the company's attention.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-22.032 F.A.C.
1st Set Data Request
BellSouth Telecommunications, LLC
March 14, 2012
Item No. 11
Page 1 of 1

REQUEST: Do you believe the costs, if any, incurred by your Company to comply with the records retention, reporting, and auditing requirements of Rule 25-22.032(10), F.A.C., for the five year period beginning July 1, 2011, if any, have an adverse impact on your Company? If so, please provide any and all data which supports your response.

RESPONSE: No.

Responsible Person: Greg Follensbee

REQUEST: Of the transactional costs estimated to be associated with compliance with 25-22.032, F.A.C., what percentage is spent on the following items:

- a. Staffing
- b. Document storage and retention
- c. Postage and shipping
- d. Communications (dedicated phone lines, emails or faxes)
- e. Other

RESPONSE: Due to the low number of Lifeline complaints AT&T receives in a given year, AT&T is unable to break out its costs into these distinct categories. The overall cost is *de minimis* to AT&T.

Responsible Person: Greg Follensbee

REQUEST: How many staff members at your Company are currently responsible for handling consumer complaints associated with 25-22.032, F.A.C.?

- a. Are they full time employees?
- b. Do these employees have responsibilities apart from handling complaints?

RESPONSE: Due to the low number of Lifeline complaints AT&T has had to deal with, AT&T does not dedicate certain employees to only handling Florida Lifeline complaints. AT&T has a centralized complaint process to handle complaints for the 50 states and three non-state jurisdictions (District of Columbia, Puerto Rico and the US Virgin Islands) it offers business in and any one of these employees in this group could handle one of the few complaints AT&T receives in Florida from one of its Lifeline customers.

Responsible Person: Greg Follensbee

REQUEST: Section 3 of Rule 25-22.032, F.A.C., states that a customer's service shall not be discontinued during the complaint resolution process. Have there been instances within 2010 through 2011, when your Company was uncompensated for service provided as a result of a billing dispute?

a. In the majority of these cases, is the Company able to recoup these costs after the complaint is resolved?

RESPONSE: No.
a. Not Applicable

Responsible Person: Greg Follensbee

REQUEST: Does your Company subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system?

- a. What are the annual costs associated with subscription to these systems, including costs due to additional requirements for staffing, operating hours and document retention?

RESPONSE: No

- a. Not Applicable

Responsible Person: Greg Follensbee

REQUEST: Approximately what percentage of complaints are resolved prior to reaching the Informal Conference stage described in section 8 of Rule 25-22.032, F.A.C.?

- a. How many times has your Company had a consumer complaint that has escalated all the way to the informal conference stage in the previous two years?
- b. How many times within 2010 through 2011, has your Company had a complaint process that was escalated beyond the informal conference stage?

RESPONSE: 100%

- a. Not Applicable
- b. Not Applicable

Responsible Person: Greg Follensbee

REQUEST: Approximately what percentage of complaints from your customers filed with the Florida Public Service Commission are successfully resolved within 30 days?

RESPONSE: 100%

Responsible Person: Mo Andriate

REQUEST: How has Rule 25-22.032, F.A.C., affected the way your Company processes complaints?

- . Has the rule had a positive, negative, or neutral impact on your Company?
- . How has the rule affected the Company's cost of handling complaints?

RESPONSE: Because Rule 25-22.032 was first made effective in 1989, AT&T modified any processes and procedures it used to address customer complaints to insure compliance many years ago. Compliance with the rule for any of AT&T Lifeline customers has a neutral impact on the company, and given the number of complaints that AT&T has experienced since July 1, 2011 has been *de minimis* and has no material affect on AT&T's cost of handling complaints.

Responsible Person: Greg Follensbee

Customer Complaints for Relay Service

- REQUEST: What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011?
- a. For the five year period beginning July 1, 2011, which requirements of Rule 25-22.032, F.A.C., if any, would be performed by the Company assuming the rule were not in effect? Please explain.
 - b. For each of the requirements identified in 1 a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011?
 - c. What are your actual transactional costs resulting from your Company's compliance with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011?

RESPONSE: AT&T Corp ("AT&T") does not currently provide telecommunications relay service but it does have a letter of intent to enter into a contract to provide relay service beginning June 1, 2012. Based on that intent, AT&T responds as follows:

AT&T's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2012 is *de minimis*.

- a. For the five year period beginning July 1, 2012, AT&T would address any customer complaints it received in an expeditious manner.
- b. Not applicable as AT&T did not provide the service during this period.
- c. Not applicable as AT&T did not provide the service during this period.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory would be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the likely impact, stated in terms of costs and/or benefits, on small businesses and small cities (as defined by Section 120.52, F.S.) located in the Company's service territory would be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3 would be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the company's service territory?

RESPONSE: AT&T estimates that the expected impact, stated in terms of costs and/or benefits, on economic growth, private sector job creation or employment, and private sector investment would be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

RESPONSE: AT&T estimates that the expected impact on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation would be *de minimis*.

Responsible Person: Greg Follensbee

REQUEST: What does the Company believe are the benefits of Rule 25-22.032, F.A.C.?

RESPONSE: AT&T believes the main benefit of Rule 25-22.032 to be the defined process the Commission has established to deal with any complaints concerning AT&T's offering of relay service in the future. Having the same process in place to address potential complaints reduces the cost AT&T will incur to comply.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-22.032 F.A.C.
1st Set Data Request
AT&T Corp.
March 14, 2012
Item No. 8
Page 1 of 1

REQUEST: Assuming Rule 25-22.032, F.A.C., is unchanged over the next five years, do you expect your Company's costs to comply with the rule going forward, to increase, decrease, or remain the same. Please explain your response.

RESPONSE: AT&T would expect its costs to comply to stay the same.

Responsible Person: Greg Follensbee

REQUEST: Does your Company currently have procedures/personnel in place to address complaints received directly from your consumers?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-22.032 F.A.C.
1st Set Data Request
AT&T Corp.
March 14, 2012
Item No. 10
Page 1 of 1

REQUEST: If Rule 25-22.032, F.A.C., were repealed would your Company continue to accept and address consumer complaints? Please explain your response.

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

Docket No. 110303-OT
Rule 25-22.032 F.A.C.
1st Set Data Request
AT&T Corp.
March 14, 2012
Item No. 11
Page 1 of 1

REQUEST: Do you believe the costs, if any, incurred by your Company to comply with the records retention, reporting, and auditing requirements of Rule 25-22.032(10), F.A.C., for the five year period beginning July 1, 2011, if any, have an adverse impact on your Company? If so, please provide any and all data which supports your response.

RESPONSE: No

Responsible Person: Greg Follensbee

REQUEST: Of the transactional costs estimated to be associated with compliance with 25-22.032, F.A.C., what percentage is spent on the following items:

- a. Staffing
- b. Document storage and retention
- c. Postage and shipping
- d. Communications (dedicated phone lines, emails or faxes)
- e. Other

RESPONSE: Since AT&T is currently not providing relay service in Florida, it is unable to breakdown its expected costs as requested.

Responsible Person: Greg Follensbee

REQUEST: How many staff members at your Company are currently responsible for handling consumer complaints associated with 25-22.032, F.A.C.?

- a. Are they full time employees?
- b. Do these employees have responsibilities apart from handling complaints?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

REQUEST: Section 3 of Rule 25-22.032, F.A.C., states that a customer's service shall not be discontinued during the complaint resolution process. Have there been instances within 2010 through 2011, when your Company was uncompensated for service provided as a result of a billing dispute?

a. In the majority of these cases, is the Company able to recoup these costs after the complaint is resolved?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

REQUEST: Does your Company subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system?

- a. What are the annual costs associated with subscription to these systems, including costs due to additional requirements for staffing, operating hours and document retention?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

REQUEST: Approximately what percentage of complaints are resolved prior to reaching the Informal Conference stage described in section 8 of Rule 25-22.032, F.A.C.?

- a. How many times has your Company had a consumer complaint that has escalated all the way to the informal conference stage in the previous two years?
- b. How many times within 2010 through 2011, has your Company had a complaint process that was escalated beyond the informal conference stage?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

REQUEST: Approximately what percentage of complaints from your customers filed with the Florida Public Service Commission are successfully resolved within 30 days?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee

REQUEST: How has Rule 25-22.032, F.A.C., affected the way your Company processes complaints?

- . Has the rule had a positive, negative, or neutral impact on your Company?
- . How has the rule affected the Company's cost of handling complaints?

RESPONSE: Not applicable, as AT&T currently does not currently provide telecommunications relay service.

Responsible Person: Greg Follensbee