Timolyn Henry

From: Woods, Vickie [vf1979@att.com]

Sent: $\quad$ Friday, June 08, 2007 4:45 PM
To: Filings@psc.state.ff.us
Subject: New Docket: AT\&T Florida's Petition for Waiver of Rule 25-4.110, F.A.C.
Attachments: Waiver.pdf
A. Vickie Woods

Legal Secretary to James Meza III, Manuel A. Gurdian and Tracy W. Hatch
AT\&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vickie.woods2@bellsouth.com
B. Docket No.: (New Docket)

Petition by AT\&T Florida for Waiver of Rule 25-4.110(5)(c), Florida Administrative Code
C. AT\&T Florida
on behalf of Manuel A. Gurdian
D. 16 pages total (includes letter, Certificate of Service, pleading and Exhibits A and B)
E. AT\&T Communications of the Southern States, LLC and BellSouth Telecommunications, Inc. d/b/a AT\&T Florida's Petition for Waiver of Rule 25-4.110, F.A.C.
.pdf
<<Waiver.pdf>>

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Manuel A. Gurdian
Attorney

## AT\&T Florida

150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

June 8, 2007
Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Re: Petition by AT\&T Florida for Waiver of Rule 25-4.110(5)(c), Florida Administrative Code

Dear Ms. Cole:
Enclosed is BellSouth Telecommunications, Inc. d/b/a AT\&T Florida's Petition for Waiver of Rule 25-4.110(5)(c), Florida Administrative Code.

Copies have been served to the parties shown on the attached Certificate of Service.

cc: All parties of record Jerry Hendrix James Mesa III E. Earl Edenfield, Jr.

CERTIFICATE OF SERVICE
Petition by AT\&T Florida for Waiver
of Rule 25-4.110(5)(c), Florida Administrative Code
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U. S. Mail this 8th day of June, 2007 to the following:
Patrick K. Wiggins
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us


## ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT\&T Florida for Waiver of Rule 25-4.110(5)(c), Florida Administrative Code

Docket No. O70 370-TP

Filed June 8, 2007

## AT\&T Florida's Petition for Waiver of Rule 25-4.110(5)(c), Florida Administrative Code

BellSouth Telecommunications, Inc. d/b/a AT\&T Florida ("AT\&T Florida"), pursuant to Section 120.542, Florida Statutes, and Rule 28-104.002, Florida Administrative Code, hereby petitions the Florida Public Service Commission ("Commission") to waive the requirements of Rule 25-4.110(5)(c), Florida Administrative Code, requiring a local exchange company ("LEC") to list the items for which nonpayment will result in disconnection of the customer's basic local service for the reasons set forth below. Specifically, AT\&T Florida seeks the following:

1. AT\&T Florida is a local exchange company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of the Commission pursuant to Chapter 364, Florida Statutes.
2. AT\&T Florida's principal place of business is 675 W . Peachtree Street, NE, Atlanta, Georgia 30375.
3. All pleadings, notices and other documents directed to AT\&T Florida in this proceeding should be provided to:

James Meza III ${ }^{1}$<br>Tracy W. Hatch<br>Manuel A. Gurdian<br>AT\&T Florida

[^0]```
c/o Nancy H. Sims
150 South Monroe Street, Ste. }40
Tallahassee, FL 32301
james.meza@bellsouth.com
305.347.5558 (telephone)
850.222.8640 (fax)
E. Earl Edenfield Jr.
AT&T Southeast
675 West Peachtree Street,
Suite 4300
Atlanta, GA }3037
kip.edenfield@bellsouth.com
404.335.0763 (telephone)
```

4. Rule 25-4.110(5)(c), Florida Administrative Code, requires LECs to list on customer bills the items for which nonpayment will result in disconnection of the customer's basic local service.
5. Specifically, Rule 25-4.110(5)(c) provides as follows:
(5) All bills rendered by a local exchange company shall clearly state the following items:
(c) Items for which nonpayment will result in disconnection of the customer's basic local service, including a statement of the consequences of nonpayment;
6. Rule 25-4.110 cites to Florida Statutes $\S 3350.127$ and $364.604(5)$ as the "specific authority" for the Rule. Florida Statutes $\S \S 350.113,364.03,364.04,364.052$, $364.17,364.19,364.601$, and 364.604 are cited as the "Law Implemented."
7. Pursuant to this Rule, AT\&T Florida currently lists regulated and nonregulated charges separately on the bills it sends to customers and provides a statement of the consequences of nonpayment.
8. In its current bill format, AT\&T Florida denotes the charges that are unregulated with a double asterisk **. A sample of AT\&T Florida's current bill format is attached hereto as Exhibit "A".
9. AT\&T Florida's current bill format, states that "[r]egulated charges are the minimum you must pay in order to maintain your local telephone service. If you do not pay this amount: your local service may be disconnected, and you may need to pay a charge or deposit to have your service reconnected. The amount of Regulated Charges may be obtained by calling 1888 757-6500."
10. The customer, in order to determine the total amount that they are required to pay to avoid disconnection, must either add the non-asterisked (i.e. regulated) charges to ascertain the total amount or contact an AT\&T customer representative.
11. The information that is critical to the customer is the total amount they must pay to avoid disconnection, and not the individual charges that make up the total. Therefore, rather than denoting each charge individually that must be paid to avoid disconnection, AT\&T Florida's proposed bill format would provide the total amount to be paid to avoid disconnection. The relevant portion of the proposed bill format would read as follows:

## PREVENT DISCONNECT

Thank you for being a valued customer. Please be aware that all charges must be paid each month to keep your account current and prevent collection activities. We are required to inform you that certain charges MUST be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$__. Also, neglecting to pay for remaining charges may result in interruption or removal of these remaining services or further collection action. A Late Payment Charge of $\$ 3.20$ may apply to an unpaid regulated balance and a $1.5 \%$ Interest charge may apply to an unpaid unregulated balance.

A sample of AT\&T Florida's proposed bill format is attached hereto as Exhibit "B".
12. In the event that a customer wants to know which regulated charges comprise the total amount to avoid disconnection, the customer will be able to contact an AT\&T customer representative to obtain the itemized regulated charges.
13. Moreover, as indicated in the above excerpt of AT\&T Florida's proposed bill format, the customer would still be advised of the consequences of nonpayment.
14. The proposed bill format is currently in use in 13 states and is intended to be used throughout the AT\&T 22 state region. If the waiver requested in the instant Petition is not granted, AT\&T Florida, in order to comply with the Rule's itemization requirement, would incur (1) information technology costs to continue to deploy the current bill format and (2) the costs required to train its customer service representatives who handle the Southeast region on two different types of billing methods and procedures. The incurrence of these costs, as well as any other currently unidentifiable costs to maintain separate bill formats on an ongoing basis, is an inefficient use of resources and would cause a "substantial hardship" upon AT\&T Florida.
15. AT\&T Florida believes that its proposed bill format serves the purposes of the underlying statutes and achieves the Rule's intent, as the proposed bill format is clear and concise, and the customer is provided the total amount required to be paid in order to avoid disconnection.
16. A requirement to itemize all of the charges that a customer must pay to avoid disconnection of service is unnecessary, because the main item of interest for the
customer is not each itemized charge but the total amount that must be paid to avoid disconnection.
17. Accordingly, based upon the foregoing, AT\&T Florida requests that the Commission permanently waive the provisions of Rule 25-4.110(5)(c) requiring AT\&T Florida to provide all items for which nonpayment will result in disconnection of the customer's basic local service.

WHEREFORE, AT\&T Florida requests that, having demonstrated good cause, the Commission waive the provisions of Rule 25-4.110(5)(c) that require AT\&T Florida to provide all items for which nonpayment will result in disconnection of the customer's basic local service.

Respectfully submitted this 8th day of June, 2007.


|  | FL CONSUMER CUSTOMER <br> Account Number 786 555-8777 4340448 |  |
| :---: | :---: | :---: |
| Monthly Statement | Account Summary | Anount |
| as of June 20, 2007 | Previous Balance .. | \$150.83 |
|  | Payments (Posted as of June 20) | -99.29 |
|  | Past Due (Please pay now) . . . . . . . . . . . . . . . . . . . . . . . . | \$51.54 |
|  | Current Charges Summary: AT\&T Companies |  |
|  | Local \& Local Toll (Page 3) | \$42.05 |
|  | Other Companies |  |
|  | AT\&T Corp. (Page 4). . . . . . . . . . . . . . . . . . . . . . . . . . | \$7.77 |
|  | Total Current Charges (Due July 11) ...................... | $\mathbf{5 4 9 . 8 2}$ |
|  | Total Amount Due (Past Due plus Current Charges)..... | \$101.36 |


| ATRT Questions? |  |
| :---: | :---: |
| Customer Service: | 1888757.6500 |
|  | P1N: 9529 |
| Outside Calling Area: | 18007530710 |
| Repair: 611 |  |
| Online: Whwbelisorth.com |  |
|  |  |
| contact numbers. |  |

News You Can Use - Page 5
Local Services provided by AT\&T Florida.

Convenient Payment Opfions:
at\&t

Account Number 786 555-8777 4340448

Yes! I am interested in BellSouth (1) FastAccess© DSL.

$$
\begin{aligned}
& \text { P.O. Box } 1262 \\
& \text { Charlotte, NC } \\
& 28201-1262
\end{aligned}
$$

## 

$X$

FL CONSLAER CUSTOMRR
1234 CONSUMER COURT
MIAMI FL 33144-2639
$\triangle$ Detach \& raturn payment slip with your check, payable to AT\&T in U.S. funds.
Current Charges Due By July 11: $\$ 49.82$ Total Amount Due: $\$ 101.36$ Amount Enclosed $\$$ $\qquad$ Amount Due Now. $\$ 51.54$ -

| Your Current Charges total is $\$ 49.82$ | Regulated charges are the minimum you must pay in order to maintain your local telephone service. <br> If you do not pay this amount: <br> your local service may be disconnected, and <br> you may need to pay a charge or deposit to have your service reconnected. <br> The amount of Regulated Charges may be obtained by calling 1888 757-5500. |
| :---: | :---: |
| Late Charge Reminder: A $\$ 3.20$ Late Payment Charge may apply to an unpaid regulaled balance and a $1.5 \%$ Interest charge may apply to an unpaid unregulated balance as | If you do not pay the rest of your bill, which includes unregulated charges - all of which are identified by "* on your bill: <br> your local phone service will not be disconnected, and you ere still responsible for paying these charges. | of Jul 20 .

## Terms and <br> Conditions

## Recurring eCheck

I hereby authorize AT\&T Services (AT\&T) to automatically charge my checking account, at the financial insifittion neme on this application for payment of bills rendered to me by AT\&T. I further authorize the financial banking institution to eccept these charges to my checking account If corrections in the account are necessary, it may involve adjustments (credits or debits) to my AT\&T account I understand that both the financial institution and AT\&T reserve the right to terminate my participation in this payment plan. 1 also understand that I may discontinue enrollment at any time with witten notice to AT\&T or by calling after ellowing the company and the financial instituion a reasonable time to act upon my notification.

## e-Bill Enroliment

I agree to receive my AT\&T bill on this website and authorize AT\&T to stop sending me paper bills and notices. I understand that I may receive one more paper bill depending upon my billing cycle. I ggree to provide AT\&T with my email address for the receipt of e-Bill notices and to keep the e-mail address updated. I agree to pay my bill using one of these approved methods (since sending paper checks without the remittance stub may delay payment posting): Automatic Payments, MasterCardeMSA, Online Payment from the BellSouth.com website, or Online Payment from my financial insitution or bill consolidator. I also understand that I may discontinue enrolment at any time. To de-enroil from Bellouthe e-Bill service, visit www.bellsouth.con/stopebill.

## Account Number:

$786555-87774340448$
Address Correction:
If your curtent billing address has changed, please clearly print your new addess below.
$\qquad$
*Please note that if you need to change the billing name on your account, you will need to contact customer service at one of the numbers shown on page 1.

Enroll me In ATBT automattc recursing eCheck! By signing below, I authorize my bank to deduct the monthly amount due on my ATAT bilf from the account shown on the enclosed check and to remil it to AT\&T. Allow 1-2 biling cyeles for recurring eCheck to begin.


For more Information about recurring oCheck and about e-Bill, visit www.bellsouth.com/pay
FL CONSUMER CUSTOMER
Account Number
$786555-87774340448$

Introducing DIRECTVO! Now a part of BellSouth Answers©!
Customize a bundle that's right for you!

Local - Long Distance - Wireless - Intemet Services - DIRECTV

** Unregulated Charge.

## FL CONSUMER CUSTOMER

Account Number
$786555-87774340448$
Detailed
Statement of
Charges
For ARt Corp.
Billing Questpons,
Call 18002220300
24 Hours a
7 Day-
7 Days a Woek

ATET Invoice Charges for Period Ending JUNE 13, 2007
For 786-555-8777

## AT\&T Messages

Effective April 22, 2007, ATET's Carrier Cost Recovery Fee will decrease temporarily to $\$ 1.49$ if you subscribe to
local service by ATET or an ATsT affiliate. Effective July 1, 2007, this fee will return to $\$ 1.99$. This fee helps arat rocover costs associated with providing state-to-state and international long distance service including expenses for national regulatory fees $f$ program and connection account servicing charges. For more information, please call 1800 854-9940. Thank you for choosing ater.

## AT\&T Messages

Thank you for choosing ATET.


## Account Number

News You Can Use From AT\&T

## Disclosures

Important Wessage for Residential Customers
As your communications provider, we want to make sure you're aware of changes in BellSouth services or biling. The Late Payment Charge, currenty $\$ 2.70$, is scheduled to increase to $\$ 3.20$, beginning with bills dated on or after June 1,2007 . The Late Payment Charge applies when the provious month's bill has not been paid in full before the next bililing date.

If you have questions regarding this change, please call your AT\&T Florida representative. Thank you for subscribing to services from AT\&T Florida.

BellSouth Has A New Check Conversion Program
Paying by check authorizes BellSouth to send the information from your check electronically to your financial institution for payment. Funds may be withdrawn from your account as scon as the same day your payment is received by BellSouth. Through this program you will not receive your check back from your financial institution. If you choose to opt-out of BelSouth's check corwersion program please call 1 800 231-2021.

PAYMENT BY PHONE
Your BellSouth phone bill can now be handied over the phone by electronic check. To make a secure electronic bill payment from your bank account, call BellSouth Customer Service at the number located on the front of your bill. You will need to provide to our Customer Service Representative either your four-digit Personal Identification Number (PIN) shown by 'Customer Service:' on the first page of your BelSouth bith, or the last four digits of the social security number associated with your telephone account. By providing your bank account information and PYN or social security number, you are authorizing Bell South and your bank or financial institution to process a one-time debit from your bank account for payment of your BellSouth bill. Bill payment options are also available on our Website at bellsouth.com. Thank you for choosing BellSouth for your communications needs.

Important Notice About Disputed Debts
Please note, any check or payment instrument in an amount less than the full armount due that you send BellSouth marked 'PAID IN FULL' or otherwise tender as full satisfaction of a disputed amount, must be sent to BellSouth Accounts Receivable Management, P.O. Box 198992, Section 22, Nashville, TN 37219-8992 and NOT the payment address shown on the payment return document. Thank you for choosing Bellsouth for your communications needs.

Returned Check Pollcy Notice
An important part of Bellsouth's commitment to our valued customers is keeping you informed of policies that may affect your account. If a check is returned to BellSouth from your financial institution, a returned check fee up to the amount permitted by law may be charged to your account.

FL CONSUMER CUSTOMER
Account Number
786 555-8777 4340448

News You Can Use
From

## Definitions

For additional information, please visit our website unw belisouth.com

General Interest

Want a faster internet? Make the switch from slow dial-up to FastAccess DSL and experience the difference a faster Internet can make. Tak and surf on the same line and get instant connections that will allow you to surf faster, pay bills faster, shop faster and much more! Getting started is a breeze. Our user-fiencty start-up kit makes instaliation quick and easy. Plus, youll get reliable service backed by our knowledgeable, live customer support staff 247 . Service not available in all areas. Order today and you can get $\$ 75$ cash back. Offer ends 6/30/2007. Reward redemption required. Visit www.att comfiastaccessdst9 or call 1877 689-2617.

Cingular Wirelesse and BellSouth are joining the now AT\&T and are now offering the hottest phones and plans! Call 1800 698-7714 today to take advantage of these great deals.
'Call Before You Dig. It's the Law'.
811
(Dialing made simple. Only three digits)
You can help promote Saiety on your job and in your community by calling to get underground utilities
L.ocated before you DIG

BellSouth is joining AT\&T to bring you all of these services: Unlimited Long Distance and Local International, celluar service, Digital TV service, and high-speed Internet. Now for a limited time you can enjoy greater savings on many of these products and experience our award-winning customer service. So bundle today and start saving month after month. Call $\{866$ 430-3785 or visit attcombundlenow today to take advantage of our limited-time cash back offer.

NOTICE REGARDING BILL DISCREPANCY
BellSouth strives to provide our vaiued customers the best service possible. However, if you have a bill discrepancy, you should notify BellSouth within 60 days atter the receipt of your BellSouth bill.

## Emergency 911 Service

Your local goverment asked you to pay a small charge each month to help provide for emergency service in your community

FCC Authorized Charge for Network Access
A charge to recover costs associsted with connecting to a telecommunications service provider's interstate network.
Telecommunications Relay Service
A surcharge to fund the relay center that provides hearing/speech impaired customers the ability to communicate with others.

FL CONSUMER CUSTOMER
Account Number
785 555-8777 4340448

| To make a payment: | Pay online @www.bellsouth.com/pay OR wite your account number on your check payable in U.S. funds to AT\&T <br> and mail it to: |  |
| :--- | :--- | :--- |
|  |  |  |
|  | AT\&T |  |
|  | P.O. Box 1262 |  |
|  | Chariotte, NC $28201-1262$ | $H=$ Federal, State and Local Tax |



## Monthly Statement

| Bill-At-A-Glance |  |
| :---: | :---: |
| Previous Bill | 150.83 |
| Payment | 99.29CR |
| Adjustments | 3.31 |
| Balance | 54.85 |
| Current Charges | 46.51 |
| Total Amount Due | \$101.36 |
| Amount Due in Full by | Jul 112007 |
| Billing Summary |  |
| Questions? Call: |  |
| $\begin{aligned} & \text { Plans and Sorvicas } \\ & \qquad \begin{array}{l} 1888757-6500 \\ \text { PIN: } 9529 \end{array} \end{aligned}$ | 38.74 |
| Repair Service: 611 |  |
| AT\&T Corp. $1800222-0300$ | 7.77 |
| Total Current Charges | 46.51 |

News You Can Use Summary

| - PREVENT DISCONNECT | - LONG DIST PROVIDERS |
| :--- | :--- |
| - LAEE PAYMENT CHANGE | : PAYMENT BY PHON: |
| - DISPUTED DEBTS | RETURNED CHECK POLICY |
| - BILLDISCREPANCY | - BIY BEFCRE YOU DIG |

See "News You Can Use" for additional information
Locsl Services provided by ATaT Fioride


| For Discussion Only |  |  |
| ---: | ---: | ---: |
| SE Consumer FL | ．．．．Reg LPC |  |
| v0．02 | 060807 | ct6697 |

2 of 2
386 555－0000 3150444
Jun 20，2007

## AT\＆T Corp．

importent Inforstion
Effective April 22，2207，R7at＇s Carrior Cont Recovory for will decrase temporarily to $\$ 1,49$ if you subseribe to local service by ATGT or an Afti affiliate．Elfective July 1 ，2007，this fot vill return to $\$ 1.99$ ．Thit fea helps akitil recover costs associtated with providing state－to－state and fot helps Anai rocover conts association witn providing state－to－sta reguletory fees $\&$ progras and comection \＆sccount survicing charges．For


Thenk you for choosing ATAT．
atat Involce Charges For Period Endiog Mu 13， 2007
For 785 555－0000

| Other Charga and Crodith |  |
| :---: | :---: |
| 1．Universal Connectivity Charge | 75 |
| For an explanation of this charge， |  |
| plense call 1800 533－2022 or visit |  |
| mw．consumer．att．con／comnoctivity＿cherge |  |
| 2．Basic Rate monthly Charge | 4.85 |
| 3．Carrier cost recovery foe | 1.49 |
| This fee recovers costs for providing long |  |
| distances mervice incluatiog costs for |  |
| regulatory fees a progres and comection |  |
| \＆account servicing．This foe in not a tax |  |
| or charge requilred by the governemt．For |  |
| sore information，call 1800886.9840. |  |
| Total other Cherges and Cradits | 7.19 |
|  |  |
| gaviment fow end Tex |  |
| 4．FL．State Comunications Tex | 17 |
| 5．FL－Local Comenications Tax | 10 |
| 6．FL－Local comunications Tax | ． 31 |
| Total governmont foes end Taxes | ． 51 |
| Total AT\＆T Corp． | 7.77 |

## News You Can Use

## PREVENT DISCONNECT

Thank you for being a valued customer．Please ba awara that all cherges must be paid each month to keep your acc ount current and prevent collection activities．We are required to inform you that certain charges MUST be peid in order to prevent interruption of basic local service．These charges are already included in the Total Amount Due and are Sss．99．Also，negiecting to pay for remaining charges may result in interruption or removal of these remaining services or further collection action．A Lete Payment Charge of $\$ 3.20$ may apply to an unpaid regulated balance and a $1.5 \%$ Interest charge may apply to an unpaid unregulated balance．

LONG DIST．PROVIDERS
Our recores indicate that you have selected AT\＆T Corp，or a company that reselis their services as your primary local toll carrier and AT\＆T Corp．or a com－ pany that resells their services as your primary long distance carriur．Please contact us if this does not agree with your records．

LATE PAYMENT CHANGE
As your communications provider，we want to make sure you＇re aware of changes in AT\＆T＇s services or billing．The Late Payment Charge，currenty $\$ 270$ ， is scheduied to increase to $\$ 3.20$ ，beginning with bills dated on or atter June 1 ， 2007．The Late Payment Charge applias when the previous morth＇s bill has not been paid in iult before the next billing date．．If you have quastions regarding been paid in fuit berore the next biling date．If you have questions regarding this change，piease call your AT\＆T Aorid
scribing to services trom AT\＆T Florida．

## PAYMENT BY PHONE

Your AT\＆T phone bill can now be handied over the phone by electronic check to make a secure electranic bill payment trom your bank account，coll AT\＆T Customer Service at the number loc ated on the front of your bill．You will need to provide to our Customer Servies Representative aither your four－digit Personal｜dentification Number（PINi shown by＇Customer Service：＇on the first page of your AT\＆T bill，or the last four digits of the social security number asso－ ciated with your telephone account By providing your bank account information and PIN or social security number，you are authorizing AT\＆T and your bank or financial institution to process a one－time debit from your bank account for pay－ ment of your AT\＆T bill．Bill payment options are also available on our Website at attcom．Thank you for choosing AT\＆T for your communications neads．

DISPUTED DEBTS
Please note，any check or payment instrument in an amount less than the full amount due that you send AT\＆T marked＇PAID IN FULL＇or otherwise tender as full satisfaction of a disputad amount，must be sent to ATaT Accounts Receivable Managemgnt，P．O．Box 198992 Section 22，Nashvilie，TN $37219-8992$ and NOT the payment address shown on the payment raturn document．Thank you for choosing ATBT for your communications needs．

RETURNED CHECK POLLCY
An important part of ATAT＇s commitment to our valued customers is keaping you informed of policies that may affect your account．If a check is returned to AT\＆T from your financial instiution，a returned check fee up to the amount per－ mitted by law may be charged to your account

BILL DISCREPANCY
ATET strives to provide our valued customers the best service passible． However，if you have a bill discrepancy，you should notify AI\＆T within 60 days after the receipt of your ATRT bill．

B11 BEFORE YOU DIG
Dialing made simple．Only three digits－811．Call Beforg You Dig．It＇s the Law＇， You can help promote Safety on your job and in your community by calling to get underground utilities locatad betore you dig！


[^0]:    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.

