



Manuel A. Gurdian
General Attorney

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

T: (305) 347-5561
F: (305) 577-4491
manuel.gurdian@att.com

RECEIVED-FPSC
09 APR 15 PM 4: 21
COMMISSION
CLERK

April 15, 2009

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. 090082-TP
Petition by AT&T Florida for Waiver of Rule 25-4.040(2),
Florida Administrative Code**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for its Responses to Questions Raised at Meeting with Staff and OPC regarding AT&T Florida's Petition, which we ask that you file in the captioned docket.

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

Sincerely,

Manuel A. Gurdian

cc: All parties of record
Jerry Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

COM _____
ECR _____
GCL 2
OPC _____
RCP _____
SSC _____
SGA _____
ADM _____
CLK 1

This confidentiality request was filed by or for a "telco" for DN 03443-09. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.
(x-ref. 02617-09)

DOCUMENT NUMBER-DATE
03442 APR 15 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 090082-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 15th day of April, 2009 to the following:

Charles Murphy
Jamie Morrow
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
cmurphy@psc.state.fl.us
jmorrow@psc.state.fl.us



Mandel A. Gurdian

4. Attachment A to AT&T's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by AT&T as confidential.

5. Attachment B to AT&T's Request for Confidential Classification is redacted copies of the documents containing the confidential information.

6. Attachment C to AT&T's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

7. The information discussed in this Request for Specified Confidential Classification is valuable, AT&T treats this information as confidential in all requests, and this information has not been generally disclosed.

8. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the Parties.

WHEREFORE, based on the foregoing, AT&T respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 15th day of April, 2009.

AT&T FLORIDA



E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5558

733362

ATTACHMENT A

**AT&T Florida
Florida Public Service Commission
Docket No. 090082-TP
Request for Confidential Classification
Page 1 of 1
4/15/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSES TO QUESTIONS RAISED AT MEETING WITH STAFF AND OPC
REGARDING AT&T FLORIDA'S PETITION**

Explanation of Proprietary Information

1. This material contains proprietary business information related to the competitive interests of AT&T Florida; more specifically, the actual cost of publishing residential white pages directories and cost savings. The data is valuable to competitors and potential competitors in formulating strategic plans and overall business strategies. This same information on competitors is not available to AT&T Florida. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

LOCATION

REASON

Page 2, Item No. 4, lines 3 thru 6

1

ATTACHMENT B

**AT&T Florida
Florida Public Service Commission
Docket No. 090082-TP
Request for Confidential Classification
4/15/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSES TO QUESTIONS RAISED AT MEETING WITH STAFF AND OPC
REGARDING AT&T FLORIDA'S PETITION**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

REDACTED

Responses to Meeting with Staff and OPC on White Page Listings.

Questions

1. What notice does the company plan to provide to customers of the change in the white page listings?

Answer: In order to inform its subscribers of the change to obtaining a copy of the residential white pages, AT&T Florida will provide the following notice: (1) on the directory cover (see mock ups attached – mock chosen will be dependent on advertisements sold) and in the following locations inside of the directories; (2) in the customer call guide in the front section of the AT&T Real Yellow Pages directory; and (3) on a stiff tab insert in the AT&T Real Yellow Pages directory. Moreover, for those subscribers who order CD-ROMs (where available), AT&T will also place ordering information on the cardboard cover containing the CD-ROM and on the CD-ROM itself. In addition, AT&T Florida will provide notice in the "News You Can Use" section of the customer's bill for the month before and in the month the directory is issued for a specific area.

AT&T Florida believes the use of a post card is inefficient and will be problematic. If a post card is used for notice in this case, AT&T will have to distribute, collect and evaluate each post card. These functions are very labor intensive and unnecessary, especially with the notices the company has identified above. Since AT&T could have post cards filtering in from multiple locations, AT&T would have to identify the various locations, verify the customer is the customer of record, verify the customer is allowed to receive the directory requested at no charge, and if not, contact the customer and see whether the customer is willing to pay for the directory. Unlike other instances when the Commission has used post cards, such as evaluation of EAS or some other customer choice, the answer was generally a yes or no. AT&T does not believe use of a post card in this situation is a viable alternative.

2. Does the website www.RealPagesLive.com update as new customers get service?

Answer: The website www.RealPagesLive.com is a copy of the published directory and does not update as new customers obtain service. However, the website www.YELLOWPAGES.com does update as new customers obtain service and as customers disconnect service.

3. Has the use of 411 increased in Austin and Atlanta after AT&T issued their directories which did not include residential white page listings.

REDACTED

Answer: AT&T did experience a small increase in residential calls to 411 the month the Austin and Atlanta directories were issued. AT&T normally experiences a spike in December for 411 calls. However, as it normally does, the trend of decline of residential 411 calls continued the following month.

4. What is the cost savings associated with AT&T's proposal?

Answer: If AT&T published residential white page listings for the four markets referenced in the Petition as it had done in the past, it would have cost AT&T approximately [REDACTED]. To replace the paper directories in the four markets with CD-ROMs, AT&T will incur a cost of approximately [REDACTED]. Thus, if the Petition is granted, AT&T's cost savings for the four markets will be more than [REDACTED], as AT&T will still incur costs to print residential white page listings for those customers who request same.

5. Does AT&T have the ability to allow customers to order a directory online?

Answer: At this time, AT&T does not have a process for subscribers to order directories online. AT&T is evaluating the potential of this alternative, but has not come to a decision as to whether this will be an option in the future.

1-605-297

REDACTED

Responses to Meeting with Staff and OPC on White Page Listings.

Questions

1. What notice does the company plan to provide to customers of the change in the white page listings?

Answer: In order to inform its subscribers of the change to obtaining a copy of the residential white pages, AT&T Florida will provide the following notice: (1) on the directory cover (see mock ups attached – mock chosen will be dependent on advertisements sold) and in the following locations inside of the directories; (2) in the customer call guide in the front section of the AT&T Real Yellow Pages directory; and (3) on a stiff tab insert in the AT&T Real Yellow Pages directory. Moreover, for those subscribers who order CD-ROMs (where available), AT&T will also place ordering information on the cardboard cover containing the CD-ROM and on the CD-ROM itself. In addition, AT&T Florida will provide notice in the "News You Can Use" section of the customer's bill for the month before and in the month the directory is issued for a specific area.

AT&T Florida believes the use of a post card is inefficient and will be problematic. If a post card is used for notice in this case, AT&T will have to distribute, collect and evaluate each post card. These functions are very labor intensive and unnecessary, especially with the notices the company has identified above. Since AT&T could have post cards filtering in from multiple locations, AT&T would have to identify the various locations, verify the customer is the customer of record, verify the customer is allowed to receive the directory requested at no charge, and if not, contact the customer and see whether the customer is willing to pay for the directory. Unlike other instances when the Commission has used post cards, such as evaluation of EAS or some other customer choice, the answer was generally a yes or no. AT&T does not believe use of a post card in this situation is a viable alternative.

2. Does the website www.RealPagesLive.com update as new customers get service?

Answer: The website www.RealPagesLive.com is a copy of the published directory and does not update as new customers obtain service. However, the website www.YELLOWPAGES.com does update as new customers obtain service and as customers disconnect service.

3. Has the use of 411 increased in Austin and Atlanta after AT&T issued their directories which did not include residential white page listings.

REDACTED

Answer: AT&T did experience a small increase in residential calls to 411 the month the Austin and Atlanta directories were issued. AT&T normally experiences a spike in December for 411 calls. However, as it normally does, the trend of decline of residential 411 calls continued the following month.

4. What is the cost savings associated with AT&T's proposal?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

Answer: If AT&T published residential white page listings for the four markets referenced in the Petition as it had done in the past, it would have cost AT&T approximately [REDACTED]. To replace the paper directories in the four markets with CD-ROMs, AT&T will incur a cost of approximately [REDACTED]. Thus, if the Petition is granted, AT&T's cost savings for the four markets will be more than [REDACTED], as AT&T will still incur costs to print residential white page listings for those customers who request same.

5. Does AT&T have the ability to allow customers to order a directory online?

Answer: At this time, AT&T does not have a process for subscribers to order directories online. AT&T is evaluating the potential of this alternative, but has not come to a decision as to whether this will be an option in the future.

ATTACHMENT C

**AT&T
Florida Public Service Commission
Docket No. 090082-TP
Request for Confidential Classification
4/15/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSES TO QUESTIONS RAISED AT MEETING WITH STAFF AND OPC
REGARDING AT&T FLORIDA'S PETITION**

ONE HIGHLIGHTED COPY

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP

STATE OF FLORIDA



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: April 16, 2009

TO: Manuel Gurdian, At&T

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 090082 or, if filed in an undocketed matter, concerning responses to questions raised at meeting with staff and OPC regarding petition, and filed on behalf of At&T. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER - DATE
03443 APR 15 2009
FPSC - COMMISSION CLERK

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850
An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us