

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of Certain)	
Rules of the Ohio Administrative Code to)	Case No. 11-4910-AU-ORD
Implement Section 4911.021, Revised Code.)	

INITIAL COMMENTS OF THE AT&T ENTITIES

Introduction

The AT&T Entities ("AT&T")¹, by their attorneys, submit these initial comments pursuant to the Entry adopted by the Commission on September 7, 2011.

The Proposed Changes To The Telecom Rules Are Appropriate, But More Time Will Be Needed To Fully Implement Them

The Entry proposes appropriate changes to the two telecom-related rules, O. A. C. §§ 4901:1-6-12 and 4901:1-6-17, in order to implement the new Section 4911.021 of the Revised Code. As a result of these changes, customers will still have ready access to the OCC's contact information on bills and disconnection notices, but will not be directed to contact the OCC call center for assistance with complaints and other utility issues. The rule changes related to the use of the 7-1-1 dialing code for the Telecommunications Relay Service are also appropriate.

¹ The AT&T Entities are The Ohio Bell Telephone Company d/b/a AT&T Ohio, AT&T Communications of Ohio, Inc., TCG Ohio, SBC Long Distance d/b/a AT&T Long Distance, SNET America, Inc. d/b/a AT&T Long Distance East, AT&T Corp. d/b/a AT&T Advanced Solutions, and BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service.

However, as to the OCC contact information changes, the Entry suggests that utilities subject to these rules may only be permitted to "exhaust existing stocks of billing forms or other materials before using new stocks." Entry, p. 2. AT&T does not use pre-printed paper "forms" for most of its billing and disconnection notices. Rather, these are generated by billing and other software and hardware using paper designed for those purposes. Thus, the key timing issue here is not one of the exhaustion of existing stocks of paper forms. Rather, the key timing issue is how quickly, and at what cost, can the required information technology systems changes be made in order to change the OCC contact information to mirror the proposed rule?

AT&T suggests that a minimum of 90 days is required to complete all the required information technology systems changes. The Commission should adopt the proposed rules with a delayed effective date in order to accommodate this schedule. This is because the normal schedule for rule amendments (65 days at JCARR, followed by "final filing" and an effective date ten days later) will not provide adequate time to implement the changes.

Conclusion

For all of the foregoing reasons, AT&T recommends that the Commission amend its rules consistent with these comments, and order a delayed effective date in order to accommodate the necessary information technology systems changes, as recommended herein.

Respectfully submitted,

The AT&T Entities

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Summary: Comments electronically filed by Jon F Kelly on behalf of The AT&T Entities