

**The Public Utilities Commission of Ohio**  
**TELECOMMUNICATIONS FILING FORM**

(Effective: 01/20/2011)

This form is intended to be used with most types of required filings. It provides check boxes with rule references for the most common types of filings. It does not replace or supersede Commission rules in any way.

In the Matter of the Application of AT&T Ohio )  
to Modify the Terms of its Residential Late Payment )  
Charge Policy )  
)

TRF Docket No. 90-5032-TP-TRF

Case No. 14-1032 -TP-ATA

**NOTE: Unless you have reserved a Case #, leave the "Case No" fields BLANK.**

Name of Registrant(s) AT&T Ohio

DBA(s) of Registrant(s) The Ohio Bell Telephone Company uses the name AT&T Ohio.

Address of Registrant(s) 45 Erieview Plaza; Suite 1600; Cleveland, Ohio 44114

Company Web Address www.att.com

Regulatory Contact Person(s) Maryann H. Mackey

Phone 216 822-0086

Fax 216 781-9643

Regulatory Contact Person's Email Address mm4182@att.com

Contact Person for Annual Report Maryann H. Mackey

Phone 216 822-0086

Address (if different from above) 45 Erieview Plaza; Suite 1600; Cleveland, Ohio 44114

Consumer Contact Information Maryann H. Mackey

Phone 216 822-0086

Address (if different from above) 45 Erieview Plaza; Suite 1600; Cleveland, Ohio 44114

Motion for protective order included with filing? ☐ Yes ☒ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: Waivers may toll any automatic timeframe.]

**Notes:**

Section I and II are Pursuant to Chapter [4901:1-6 OAC](#)

Section III – Carrier to Carrier is Pursuant to [4901:1-7 OAC](#), and Wireless is Pursuant to [4901:1-6-24 OAC](#).

Section IV – Attestation

(1) Indicate the Carrier Type and the reason for submitting this form by checking the boxes below.

(2) For requirements for various applications, see the identified section of Ohio Administrative Code Section 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the Commission may be obtained from the Commission's web site at [www.puco.ohio.gov](http://www.puco.ohio.gov) under the docketing information system section, by calling the docketing division at 614-466-4095, or by visiting the docketing division at the offices of the Commission.

(4) An Incumbent Local Exchange Carrier (ILEC) offering basic local exchange service (BLES) outside its traditional service area should choose CLEC designation when proposing to offer BLES outside its traditional service area or when proposing to make changes to that service.

**All Filings that result in a change to one or more tariff pages require, at a minimum, the following exhibits.**

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s)
B	The Tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

## Section I – Part I - Common Filings

<b>Carrier Type</b> <input type="checkbox"/> <b>Other</b> (explain below)	<input checked="" type="checkbox"/> <b>For Profit ILEC</b>	<input type="checkbox"/> <b>Not For Profit ILEC</b>	<input type="checkbox"/> <b>CLEC</b>
Change terms & conditions of existing BLES	<input type="checkbox"/> ATA <a href="#">1-6-14(H)</a> (Auto 30 days)	<input type="checkbox"/> ATA <a href="#">1-6-14(H)</a> (Auto 30 days)	<input type="checkbox"/> ATA <a href="#">1-6-14(H)</a> (Auto 30 days)
Introduce non-recurring charge, surcharge, or fee to BLES			<input type="checkbox"/> ATA <a href="#">1-6-14(H)</a> (Auto 30 days)
Introduce or Increase Late Payment	<input checked="" type="checkbox"/> ATA <a href="#">1-6-14(I)</a> (Auto 30 days)	<input type="checkbox"/> ATA <a href="#">1-6-14(I)</a> (Auto 30 days)	<input type="checkbox"/> ATA <a href="#">1-6-14(I)</a> (Auto 30 days)
Revisions to BLES Cap.	<input type="checkbox"/> ZTA <a href="#">1-6-14(F)</a> (0 day Notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA <a href="#">1-6-14(H)</a> (0 day Notice)	<input type="checkbox"/> ZTA <a href="#">1-6-14(H)</a> (0 day Notice)	<input type="checkbox"/> ZTA <a href="#">1-6-14(H)</a> (0 day Notice)
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA <a href="#">1-6-27(C)</a> (0 day Notice)	<input type="checkbox"/> ZTA <a href="#">1-6-27(C)</a> (0 day Notice)	
Change BLES Rates	<input type="checkbox"/> TRF <a href="#">1-6-14(F)</a> (0 day Notice)	<input type="checkbox"/> TRF <a href="#">1-6-14(F)(4)</a> (0 day Notice)	<input type="checkbox"/> TRF <a href="#">1-6-14(G)</a> (0 day Notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS <a href="#">1-6-14(C)(1)(c)</a> (Auto 30 days)		
Change in boundary	<input type="checkbox"/> ACB <a href="#">1-6-32</a> (Auto 14 days)	<input type="checkbox"/> ACB <a href="#">1-6-32</a> (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF <a href="#">1-6-08(G)</a> (0 day)
BLES withdrawal			<input type="checkbox"/> ZTA <a href="#">1-6-25(B)</a> (0 day Notice)
<b>Other*</b>			

## Section I – Part II – Customer Notification Offerings Pursuant to Chapter [4901:1-6-7 OAC](#)

Type of Notice	Direct Mail	Bill Insert	Bill Notation	Electronic Mail
<input type="checkbox"/> 15-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> 30-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Date Notice Sent:</b>				

## Section I – Part III –IOS Offerings Pursuant to Chapter [4901:1-6-22 OAC](#)

IOS	Introduce New	Tariff Change	Price Change	Withdraw
<input type="checkbox"/> IOS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section II – Part I – Carrier Certification - Pursuant to Chapter [4901:1-6-08, 09 & 10 OAC](#)

Certification	ILEC (Out of Territory)	CLEC	Telecommunication s Service Provider Not Offering Local	CESTC	CETC
* See Supplemental form	<input type="checkbox"/> ACE <a href="#">1-6-08</a> * (Auto 30- day)	<input type="checkbox"/> ACE <a href="#">1-6-08</a> * (Auto 30 day)	<input type="checkbox"/> ACE <a href="#">1-6-08</a> * (Auto 30 days)	<input type="checkbox"/> ACE <a href="#">1-6-10</a> (Auto 30 day)	<input type="checkbox"/> UNC <a href="#">1-6-09</a> * (Non-Auto)

\*Supplemental Certification forms can be found on the Commission Web Page.

## Section II – Part II – Certificate Status & Procedural

Certificate Status	ILEC	CLEC	Telecommunications Service Provider Not Offering Local
Abandon all Services		<input type="checkbox"/> ABN <a href="#">1-6-26</a> (Auto 30 days)	<input type="checkbox"/> ABN <a href="#">1-6-26</a> (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ACN <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> ACO <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Merger *	<input type="checkbox"/> AMT <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> AMT <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ATC <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ATR <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)

\* Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR and CIO applications see [the 4901:1-6-29 Filing Requirements on the Commission's Web Page](#) for a complete list of exhibits.

## Section III – Carrier to Carrier (Pursuant to [4901:1-7](#)), and Wireless (Pursuant to [4901:1-6-24](#))

Carrier to Carrier	ILEC	CLEC
Interconnection agreement, or amendment to an approved agreement	<input type="checkbox"/> NAG <a href="#">1-7-07</a> (Auto 90 day)	<input type="checkbox"/> NAG <a href="#">1-7-07</a> (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB <a href="#">1-7-09</a> (Non-Auto)	<input type="checkbox"/> ARB <a href="#">1-7-09</a> (Non-Auto)
Introduce or change c-t-c service tariffs,	<input type="checkbox"/> ATA <a href="#">1-7-14</a> (Auto 30 day)	<input type="checkbox"/> ATA <a href="#">1-7-14</a> (Auto 30 day)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <a href="#">1-7-04</a> or 05 (Non-Auto)	
Changes in rates, terms & conditions to Pole Attachment, Conduit Occupancy and Rights- of-Way.	<input type="checkbox"/> UNC <a href="#">1-7-23(B)</a> (Non-Auto)	
<b>Wireless Providers</b> See <a href="#">4901:1-6-24</a>	<input type="checkbox"/> RCC [Registration & Change in Operations]	<input type="checkbox"/> NAG [Interconnection Agreement or

#### Section IV. – Attestation

Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

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**AFFIDAVIT**  
***Compliance with Commission Rules***

I am an officer/agent of the applicant corporation, AT&T Ohio, and am authorized to make this statement on its behalf.

Please Check ALL that apply:

- I attest that these tariffs comply with all applicable rules for the state of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.
- I attest that customer notices accompanying this filing form were sent to affected customers, as specified in Section II, in accordance with Rule 4901:1-6-7, Ohio Administrative Code.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2014 at Cleveland, Ohio

*\* /s/ Maryann Mackey*

June 6, 2014

Director, Regulatory

- *This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

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**VERIFICATION**

I, Maryann H. Mackey, verify that I have utilized the Telecommunications Filing Form for most proceedings provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

*\* /s/ Maryann Mackey*

June 6, 2014

Director, Regulatory

*\*Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

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***Send your completed Application Form, including all required attachments as well as the required number of copies, to:***

**Public Utilities Commission of Ohio**  
**Attention: Docketing Division**  
**180 East Broad Street, Columbus, OH 43215-3793**  
**Or**

***Make such filing electronically as directed in Case No 06-900-AU-WVR***

# **EXHIBIT A**

## 2. PAYMENT FOR SERVICE (cont'd)

### 2.10 Late Payment Charges for Residence BLES Services

A late payment charge will be applied to residential customer bills which remain unpaid after the due date. This charge will be the greater of either \$5.00, or an amount that equals 1.5% of all unpaid charges which are past due; except that the charge is not applicable as specified below. This late payment charge will not be placed on the customer's account until the past due, unpaid balance on that customer's account is at least nineteen calendar days from the postmark on the bill. (D)

A. The late payment charge does not apply to:

- Amounts which are in dispute at the time the late payment charge would otherwise be applied.
- Any previous late payment fees included in the amount due.
- Service establishment charges for Lifeline.
- Federal excise tax or any other taxes levied by law directly on the customer.
- Amounts billed by the Company for other entities for which the charge is not authorized by those entities' appropriate tariffs or contracts, other than Interexchange Carrier Services for which the Company, acting as the principal Billing and Collection Agent, purchases the accounts receivable in advance of subscriber billing.
- Amounts upon which an Interexchange Carrier has already assessed a Late Payment Charge.

# **EXHIBIT B**

## 2. PAYMENT FOR SERVICE (cont'd)

### 2.10 Late Payment Charges for Residence BLES Services

A late payment charge of \$6.50 will be applied to residential customer bills which remain unpaid after the due date, except that the charge is not applicable as specified below. This late payment charge will not be placed on the customer's account until the past due, unpaid balance on that customer's account is at least nineteen calendar days from the postmark on the bill. (C)  
(C)

A. The late payment charge does not apply to:

- Amounts which are in dispute at the time the late payment charge would otherwise be applied.
- Any previous late payment fees included in the amount due.
- Service establishment charges for Lifeline.
- Federal excise tax or any other taxes levied by law directly on the customer.
- Amounts billed by the Company for other entities for which the charge is not authorized by those entities' appropriate tariffs or contracts, other than Interexchange Carrier Services for which the Company, acting as the principal Billing and Collection Agent, purchases the accounts receivable in advance of subscriber billing.
- Amounts upon which an Interexchange Carrier has already assessed a Late Payment Charge.



## Exhibit C

AT&T Ohio hereby revises Part 2, Section 2 of its AT&T Ohio Tariff P.U.C.O. No. 20, to modify the terms and conditions associated with the residential late payment charge ("LPC") applicable to basic local exchange service.

Currently, residential customers are subject to an LPC of \$5.00 or 1.5% of the past due balance, whichever is higher. Effective 9.1.2014, there will be a change to the application of the LPC on residential bills: the LPC will change to a flat fee of \$6.50 per month on all outstanding balances not paid by the due date and the 1.5% charge will be eliminated.

This change will achieve uniformity and consistency with other AT&T services including AT&T U-verse and AT&T Mobility and will more closely recoup the costs incurred by the Company for treatment of past due accounts which includes notification to customers, treatment processes, the cost of money, etc.

It is also consistent with the LPCs charged by other utility providers and other providers. Some of the specific LPC charges assessed by other providers are shown here:

Frontier	The greater of \$7.50 or 1.5% on balances greater than \$30.
Comcast	\$8.00 on any past due balance.
Charter	\$7.95 on any past due balance.
Cablevision	\$8.00 on any past due balance.

AT&T Ohio's proposed \$6.50 fee is a relatively minimal amount of money when compared to the LPCs charged by other commercial entities such as credit card companies which typically charge much higher fees. Listed here are the late fees assessed by some of the major credit card issuers:

Citibank	\$15 on balances up to \$100; \$25 on balances of \$100 to \$1,000; \$35 on balances over \$1,000.
MBNA	\$15 on balances up to \$500; \$29 on balances of \$500 to \$1,000; \$39 on balances over \$1,000.
Discover	\$15 on balances up to \$100; \$25 on balances of \$100 to \$1,000; \$35 on balances over \$1,000.
Bank of America	\$19 on balances up to \$100; \$29 on balances of \$100 to \$1,000; \$39 on balances over \$1,000.

LPCs are avoidable charges and are under the control of the customer. Assessment of an LPC only occurs if a customer does not pay their bill or pays late. No customer ever has to incur this charge so long as they pay on time. This charge does not change the monthly rate for the services a customer subscribes to. AT&T Ohio submits that the proposed modification of the residential late payment charge is consistent with late payment charges assessed by other providers and clearly meets the standard of reasonableness set forth in Section 4901:1-6-14(I) of the Commission's rules.

## **EXHIBIT D**

The following AT&T Ohio bill page message was printed on the bills of residence customers from 6.27.2014 through 7.27.2014.

### **LATE PAYMENT CHARGE**

Beginning 9/1/2014, there will be changes to the late payment charge (LPC) on all outstanding balances not paid by the due date. Currently the LPC is \$5.00 or an amount that equals 1.5 % on all unpaid charges, whichever is greater. The LPC will change to a flat fee of \$6.50 per month and the 1.5% charge will be eliminated. For more information, visit us online at [att.com](http://att.com) or call 800.288.2020.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**6/6/2014 3:26:34 PM**

**in**

**Case No(s). 90-5032-TP-TRF, 14-1032-TP-ATA**

Summary: Tariff to modify the residential late payment charge electronically filed by Maryann Mackey on behalf of AT&T Ohio