

FILE

5

RECEIVED-DOCKETING DIV
2007 OCT 25 PM 4:44
PUCO

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of Certain)
Rules to Revise Language Requirements) Case No. 07-1042-AU-ORD
On Case No. 07-1042-AU-ORD Utility Bills and)
Other Documents.)

REPLY COMMENTS OF AT&T

Pursuant to the Commission's Entry dated October 3, 2007, AT&T submits these reply comments. AT&T¹ had no objection to the Commission's proposed rule changes, and as such, did not file initial comments. AT&T, however, does have concerns with the Consumer Coalition's initial comments filed in this docket on October 18, 2007. In general, AT&T supports the Commission's proposed language over the Consumer Coalition's because it is clear and more concise.

The Consumer Coalition proposes that the Commission should require that the relevant contact information, absent a waiver, appear as soon as possible on all utility materials and in any event "no later than 30 days after the effective date of the rules." This proposal is unreasonable and must be rejected. It is well known that the planning and programming required to make modifications to the customer's bill and to disconnection notices take significantly more time than 30 days. Because the Consumer Coalition is questioning the Commission's proposed changes as set forth in its original comments, companies cannot yet begin to plan, order and implement these changes until the

¹ AT&T includes The Ohio Bell Telephone Company d/b/a AT&T Ohio, AT&T Communications of Ohio, Inc., TCG Ohio, Inc., and SBC Long Distance, LLC d/b/a AT&T Long Distance.

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician TM Date Processed 10/24/2007

Commission provides specific language and direction in its subsequent opinion and order. To support its request, the Consumer Coalition relies on a false conclusion that the utilities had expeditiously removed the Office of Consumers' Counsel's contact information in previous dockets. The removal of that information required additional planning and programming that took a significant amount of time, far more than 30 days to complete the project. Therefore, the Consumer Coalition's proposal should be rejected.

Furthermore, the timeframe for the new and additional modifications in this docket should be coordinated with the changes that are required under the MTSS rule changes in Case No. 05-1102-TP-ORD, some of which will take effect January 1, 2008, and the disconnection notice rule that will take effect June 1, 2008. These new modifications, with multiple effective dates, will clearly complicate the effort to meet these established timeframes, may result in waiver requests for additional time because of programming constraints, and add incremental costs to utilities. While AT&T has been working diligently to keep the MTSS modifications on track, it proposes that the deadline required in this docket and the MTSS rulemaking docket be uniform. This would eliminate the confusion involved with multiple changes being required on multiple pieces of information.

Finally, AT&T supports AEP Ohio's request made in its initial comments that the Commission make clear in its order that affected utilities will be permitted to use any bill stock on hand or already ordered before being required to begin using new bill stock in conformance with any such modifications. This is a sound approach and has been previously allowed.

In making such decisions, the Commission should recognize that modifications caused by this docket result in incremental costs that are not incurred by all of AT&T's competitors, e.g., VoIP and wireless providers. To the extent such costs are not incurred by all competitors, the imposition of such costs is a competitive disadvantage.

Respectfully submitted,

A handwritten signature in cursive script, reading "Mary Ryan Fenlon".

Mary Ryan Fenlon (Counsel of Record)

Jon F. Kelly

AT&T

150 E. Gay St.

Columbus, Ohio 43215

(614) 223-3302

Its Attorneys

Certificate of Service

I hereby certify that a copy of the foregoing has been served this 25th day of October, 2007, by first class mail, postage prepaid where noted, on the parties shown below.


Mary Ryan Ferlon

OHIO CONSUMERS' COUNSEL

Janine Migden-Ostrander
Ohio Consumers' Counsel
10 W. Broad Street, Suite 1800
Columbus, OH 43215-3485

AARP OHIO

Ron Bridges
AARP Ohio
17 South High Street, Suite 800
Columbus, OH 43215-3467

CITY OF TOLEDO

Kerry Bruce
Leslie A. Kovacik
City of Toledo
420 Madison Avenue, Fourth Floor
Toledo, OH 43604

**COUNSEL FOR OHIO PARTNERS
FOR AFFORDABLE ENERGY**

David C. Rinebolt
231 West Lima Street
P.O. Box 1793
Findlay, Ohio 45839-

**APPALACHIAN PEOPLE'S
ACTION COALITION**

Michael R. Smalz
Ohio State Legal Services Association
555 Buttles Avenue
Columbus, OH 43215

**COUNSEL FOR EMPOWERMENT
CENTER OF GREATER
CLEVELAND, CONSUMERS FOR
FAIR UTILITY RATES AND THE
NEIGHBORHOOD
ENVIRONMENTAL COALITION**

Joseph P. Meissner
Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, Ohio 44113

CITY OF CLEVELAND

Harold Madorsky
Robert Triozzi
City of Cleveland
City Hall, Room 106
601 Lakeside Avenue
Cleveland, OH 44114

**COMMUNITY ACTION
PARTNERSHIP
OF THE GREATER DAYTON
AREA**

Ellis Jacobs
Advocates for Basic Legal Equality, Inc.
333 West First Street, Suite 500.
Dayton, OH 45402

**COLUMBUS SOUTHERN POWER
COMPANY AND OHIO POWER
COMPANY**

Marvin Resnik
American Electric Power
Service Corporation
1 Riverside Plaza
Columbus, OH 43215