BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of Chapter 4901:1-6 of the Ohio Administrative Code, Regarding Telephone Company Procedures and Standards.	)))))	Case No. 14-1554-TP-ORD

INITIAL COMMENTS OF THE AT&T ENTITIES

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Introduction

The AT&T Entities[1], by their attorney and pursuant to the Entry adopted on January 7, 2015, submit these initial comments on the Staff's proposed revisions to the Retail Telecommunication Services Rules. In general, the AT&T Entities are supportive of the Staff's recommendations for amendments to the Retail Telecommunication Services rules.

However, the Staff's recommendations do not go far enough. As part of its review of these rules, under both the controlling statute and the Governor's Common Sense Initiative, as cited in the September 8, 2014 Entry, the Commission should do more. Specifically, the Commission should examine the provisions of the rules that the AT&T Entities cite below that lack any statutory or jurisdictional basis. In many cases, the AT&T Entities ask that the Commission revisit some of its 2010 interpretations that led to the adoption of the current rules. Some of those interpretations were clearly erroneous, for the reasons explained below.

1. Rule 1 - Definitions - Reinterpretation of "BLES"

The Commission's 2010 interpretation of what constitutes basic local exchange service ("BLES") in the residential setting was wrong and should be revisited now. As AT&T explained in its initial comments:

[1] The AT&T Entities are The Ohio Bell Telephone Company ("AT&T Ohio"), AT&T Corp., Teleport Communications America LLC, New Cingular Wireless PCS LLC, and Cricket Communications, Inc.

BLES is defined in the Act as:

> a single line to a residential end user
>
> or
>
> a primary line to a small business end user[2]
>
> R. C. § 4927.01(A)(1). In the case of residential service, the presence of two or more lines precludes either one from being BLES, by definition.

Case No. 10-1010-TP-ORD, AT&T Initial Comments, August 30, 2010, p. 13. Contrary to this clear definition, however, the Commission opined that a residential BLES customer can have a second line. Case No. 10-1010-TP-ORD, Opinion and Order, October 27, 2010 (hereinafter referred to as the "2010 Order"), p. 20.[3] This opinion is clearly inconsistent with the law.

The language of the Act is clear. In the residential setting, BLES can only be a "single line to a residential end user," as specified in R. C. § 4927.01(A)(1). This definition was carefully crafted to reflect the public policy decision that the "safety net" of BLES pricing and service quality protections was intended to be very narrow. The General Assembly was cognizant of the multi-line issue and if the General Assembly had intended for any line on a multi-line residence account to be considered BLES, it would have said so, as it did for multi-line business accounts. For example, it might have defined residential BLES as the "primary line" to a residence, as it did in defining business BLES. But it did not do so. It limited BLES in the residential setting to a single line. Not the "primary line." Not "one of the lines of a multi-line account." It is only a single line. The clear language of the Act provides no room for the

[2] A "small business," in turn, is defined as "a nonresidential service customer with three or fewer service access lines." R. C. § 4927.01(A)(9).

[3] There, the Commission stated: "Rather, we agree with OPTC that, for purposes of the definition of BLES in Section 4927.01(A)(1), Revised Code, residential access and usage of services 'over a single line' does not preclude a customer from having a second non-BLES line, as long as such service 'is not part of a bundle or package of services.' In other words, the first residential line can still be BLES, even if a customer purchases other a la carte services or features, including a second line."

"interpretation" the Commission has given it. The General Assembly could not have been much clearer in its definition: ***a single line to a residential end user***.

Under the previous definition, the concept of a "primary line" applied in both the residential and business settings:

> (A) "Basic local exchange service" means:
>
> (1) End user access to and usage of telephone company-provided services that enable a customer, ***over the primary line serving the customer's premises,*** to originate or receive voice communications within a local service area, and that consist of the following:
>
> * * *

Former R. C. § 4927.01(A)(1), repealed September 13, 2010 (emphasis added). Under the definition as revised by the Act, it does not. R. C. § 4927.01(A)(1), effective September 13, 2010. Under the Act, the term "primary access line" is a modifier only in the business setting. The adopted rule ignores this important change made by the Act. The Commission erred in expanding residential BLES beyond a single line to a residential end user in 2010 and it should correct that error now.

In its Second Entry on Rehearing, the Commission stated: "We continue to believe that the legislative intent clearly identified BLES as 'a single line' whether or not that line is purchased with a la carte features and/or another line." Case No. 10-1010-TP-ORD, Second Entry on Rehearing, December 15, 2010, p. 6. Here, too, the Commission failed to acknowledge or accept the change in the statutory definition adopted in S. B. 162. The Legislative Service Commission's Final Bill Analysis of the Act explicitly recognized this important change in the statutory definition:

> ***Under prior law***, "basic local exchange service" was defined as "end user access to and usage of telephone company-provided services ***that enable a customer, over the primary line serving the customer's premises***, to originate or receive voice communications within a local service area, and that consist of" certain enumerated services. Those services were, and generally remain under the act, (1) local dial tone service, (2) touch tone dialing service, (3) access to and usage of 9-1-1 services, where available, (4) access to operator services and directory assistance, (5) provision of a telephone directory and a listing in that directory, (6) per call, caller identification blocking services, (7) access to telecommunications relay services, and (8) access to toll presubscription, interexchange or toll providers or both, and networks of other telephone companies. ***The act alters the definition by providing that the term means "residential-end-user access to and usage of telephone-company-provided services over a single line*** or small-business-end-user access to and usage of telephone-company provided services over the primary access line of service, which in the case of residential and small-business access and usage is not part of a bundle or package of services, that does both of the following: enables a customer to originate or receive voice communications within a local service area as that area existed on the effective date of the [act]; and consists" of certain enumerated services. The services include (1) to (8) described above, with a few changes and additions. With respect to additional services, "basic local exchange service" under the act also includes flat-rate telephone exchange service for residential end users. In addition, the act expands (5) above to allow the directory to be provided "in any reasonable format for no additional charge" and requires "reasonable accommodations for private listings." (R.C. 4927.01.)

Legislative Service Commission's Final Bill Analysis of Sub. S. B. 162, pp. 28-29, footnote 17 (emphasis added).[4]

The Commission's erroneous reading of this fundamental definition has had broad implications. First, it has subjected one line of a multi-line residential account to the BLES pricing and service quality requirements of the law and the rules. Second, it has created significant operational issues for the affected companies. On a multi-line account, how does one determine which line is subject to the BLES regulatory regime? Would it be the one identified on the account as the "main number," would it be the "billed telephone number," or would it be a line that the company or perhaps the customer picks? These problems, and perhaps more, are the result of the Commission's erroneous interpretation. They can be avoided or ended by following - - and not straying from - - the clear statutory definition and the legislative intent.

[4] See, http://www.legislature.state.oh.us/analyses.cfm?ID=128_SB_162&ACT=As%20Enrolled.

Contrary to the Commission's erroneous conclusion, when a residential customer has two or more lines, all of the customer's lines are "non-BLES." As noted above, a multi-line residential account is not one that the public policy “safety net” of the Act was intended to include. The Commission should correct this error now, as it reviews the rules adopted in 2010, and acknowledge that, in the residential setting, the statutory definition identifies only a "single line" as a BLES line.

2. Rule 2 – Purpose and Scope

AT&T suggests that the date, September 13, 2010, in division (H) of this rule be updated when the rule revisions are finalized to reflect the current date.

3. Rule 7 – Customer Notice

Rule 7 is based on the statutory requirement that, in general, “a telephone company shall provide at least fifteen days’ advance notice to its affected customers of any material change in the rates, terms, and conditions of a service and any change in the company’s operations that are not transparent to customers and may impact service.” R. C. § 4927.17(A). The rule, though, goes beyond this statutory minimum and calls on the telephone companies to provide to the Commission a copy of each such notice, along with an affidavit verifying that the notice was provided to affected customers. Rule 7(C). The rule specifies other requirements for customer notice as well. Rule 7 (D)-(H).

The Commission should consider limiting the requirements of Rule 7 (C) – (G) to tariffed services. It is simply too much to apply all of these requirements to customer notices

concerning detariffed or even non-regulated services in today's competitive marketplace. The Commission has the power to investigate compliance with the statute and with divisions (A) and (B) of Rule 7 without the need for the submission to the Commission Staff of all customer notices, with the accompanying affidavit, as required by division (C) of the rule. In reviewing the rule, the Commission should examine the continued need for such a broad rule when it has other, less onerous means to assure compliance with the basic requirement for customer notice. As it stands today, the rule goes well beyond the statutory requirements.

4. Rule 14 - BLES Rate Increases

In the initial implementation of these rules, the Commission Staff misinterpreted the statute and concluded that an increase of one BLES rate by $1.25 in an exchange precluded any increase to another BLES rate in that exchange until one year elapsed. This interpretation was in error and should be revisited now. The statute places limits on the prices of "basic local exchange service," and contemplates that there can be more than one such service offered by an ILEC. ILECs offer both residential and business BLES. The services are independent of each other and should be treated separately for purposes of the rate cap. An increase in a business BLES rate during a 12-month period should have no impact on an increase to a residential BLES rate increase.

The Commission should clarify that the rule allows for multiple increases to BLES rates on an annual basis, irrespective of whether the increase is applicable to residential BLES or business BLES, or whether the increase is in the same or different exchanges, so long as the total yearly increase is not greater than the $1.25 limit.

5. Rule 14 - Late Payment Charges

Another aspect of Rule 14 is problematic. Rule 4901:1-6-14(I) purports to regulate the introduction of and increases to late payment charges assessed on an account with a BLES line. But the Commission is without authority under the Act to adopt such a rule. In its comments on this issue, AT&T stated:

> It is even more of a stretch to suggest, in division (I), that "late payment charges for BLES" are subject to the Commission's rate-regulation authority. The statute does not give the Commission such power. It bears repeating, as noted in the Introduction:
>
> > Except as ***specifically authorized*** in sections 4927.01 to 4927.21 of the Revised Code, the commission has ***no authority*** over the quality of service and the service rates, terms, and conditions of telecommunications service provided to end users by a telephone company.
>
> R. C. § 4927.03(D) (emphasis added). The Commission retains no authority over late payment charges, whether they apply to regulated services such as BLES, or deregulated or detariffed services. In the case of AT&T Ohio (and likely many other LECs), late payment charges apply to the entire bill, not just to the BLES or other discrete services that may be included in that bill. For these reasons, division (I) should not be adopted.

Case No. 10-1010-TP-ORD, AT&T Initial Comments, August 30, 2010, p. 16.

In response to these and other industry comments, however, the Commission declined "to modify substantively the rule with respect to the limitations on late payment fees . . . . " 2010 Order, p. 21. By failing to "modify" the proposed rule "substantively," or, as it was required to do under the Act, ***reject*** the proposed rule on late payment charges, the Commission has erred. While the Commission might have been of the view that the elimination of restrictions on late payment charges "would make no sense" (Id., p. 21), the General Assembly came to the opposite conclusion. The Act contains no provision under which the restrictions on late payment charges are authorized or justified. In fact, nowhere in the Act are late payment charges even mentioned. Here, too, the Commission violated R. C. § 4903.09 by failing to

justify its order on statutory grounds. On further review of the rules, therefore, the Commission must eliminate division (I) from this rule.

6. Rule 14 - BLES Installation and Reconnection Fees, and Nonrecurring Service Charges

There are two final issues with Rule 14. While rule 14(H)(2) provides for the introduction of a nonrecurring service charge, surcharge or fee to BLES by *CLECs*, it does not provide similar authority for *ILECs*. Rule 4901:1-6-14(H)(2). And rule 14(J) caps BLES installation and reconnection fees at the tariffed rates for such charges as of September 13, 2010. Rule 4901:1-6-14(J). There is no basis at all in the law for these restrictions. Moreover, there is no basis in the law for the discriminatory treatment of ILECs relative to the CLECs in this area. The current restriction on the ILECs is no doubt tied to the theory that any such increase might result in an impermissible increase to BLES rates. Since this theory is invalid, so too is the restriction.

As to the non-recurring charges, only the monthly recurring charges for BLES are governed by R. C. § 4927.12, while other nonrecurring fees, including the installation and reconnection fees associated with BLES, are not so governed. The Commission should revisit its 2010 conclusion in this regard.

As AT&T explained in its initial comments:

> The Act simply requires that the "rates, terms, and conditions for basic local exchange service and for installation and reconnection fees for basic local exchange service shall be tariffed in the manner prescribed by rule adopted by the commission." R. C. § 4927.12(F)(emphasis added). Through this language, the Act requires that installation and reconnection fees be tariffed, ***but it grants the Commission no price-regulation authority over these fees.*** In using the phrase "in the manner," the Act allows the

> Commission to specify "how" these fees appear in the tariff, and the mechanics of how such fees can be altered, ***but gives it no authority over the determination of the level of those fees***. That is left to the marketplace of competitive telecommunications services and providers. A customer who is dissatisfied with a LEC's installation or reconnection fees can complain to the LEC and can, ultimately, select another carrier. That is a function of the market-based pricing that the Act envisions for these, and many other, services.

Case No. 10-1010-TP-ORD, AT&T Initial Comments, August 30, 2010, pp. 15-16 (emphasis added).

The Act specifies:

> Except as ***specifically authorized*** in sections 4927.01 to 4927.21 of the Revised Code, the commission has ***no authority*** over the quality of service and the service ***rates, terms, and conditions*** of telecommunications service provided to end users by a telephone company.

R. C. § 4927.03(D) (emphasis added). Under this provision, the Commission has no authority over the introduction of other nonrecurring fees applicable to BLES, or over the ***level*** of the charges for BLES installation and reconnection; only the ***manner*** in which those charges are tariffed is within the Commission's authority. This is an important distinction that the Commission ignored in 2010 but must recognize now.

Underlying the restrictions adopted in 2010 might have been the presumption that because there is no mechanism to increase the charges at issue, they cannot be increased and must be capped at the rates in effect on the effective date of the Act. This presumption is unfounded. It is also inconsistent with the limitation on the Commission's authority quoted above. The conclusion that is consistent with the statute is one in which the monthly recurring charges for BLES are governed by R. C. § 4927.12, while other nonrecurring fees, including the installation and reconnection fees associated with BLES, are not so governed. The Commission

cannot expand that authority to include these fees. It matters not that "it would make no sense" to not have pricing parameters around those fees or charges, as the Order asserts. Opinion and Order, p. 21.

The General Assembly did not impose pricing parameters on those fees and it did not give the Commission any discretion to do so, either. To illustrate this point, the rates for long distance service are not limited by the Act. Yet no one would argue that because there is no mechanism to increase those rates, they must, therefore, be capped at September 13, 2010 levels. As with all services for which no rate limitations are specified in the Act, the General Assembly has permitted the marketplace to set the rates. In the same vein, there are no rate limitations (other than those imposed by market forces and the general standard of reasonableness in R. C. § 4927.21) on BLES installation and reconnection fees or on other nonrecurring fees or on late payment charges. The General Assembly clearly intended those fees to be market-based, in keeping with the general market-based approach of many of the reforms adopted in S. B. 162.

In this rule review, the Commission should “right this wrong” and modify division (H)(2) and eliminate division (J) of rule 4901:1-6-14. The standard of reasonableness required by R. C. § 4927.21 should be applied to BLES nonrecurring fees, installation and reconnection fees and to late payment charges (discussed in the previous section) in the same manner as it will be applied to all other services for which no rate limitations are authorized. There is no reason - - and no statutory basis - - to single out these particular fees and charges and explicitly mandate more stringent and unauthorized pricing constraints for them. These fees should be treated like similar CLEC fees under Rule 4901:1-6(H)(2).

7. Rule 15 - Directory Scoping

Rule 4901:1-6-15(A) requires, in part, that "[t]he telephone directory shall include all published telephone numbers in current use within the ILEC local calling area, including numbers for an emergency such as 9-1-1, the local police, the state highway patrol, the county sheriff and fire departments, the Ohio relay service, operator service, and directory assistance." Imposing these directory scoping and content requirements exceeds the Commission's authority under the Act.

As AT&T stated in its initial comments:

> BLES includes "[p]rovision of a telephone directory ***in any reasonable format*** for no additional charge and a listing in that directory, with reasonable accommodations made for private listings." R. C. § 4927.01(A)(1)(b)(vi)(emphasis added). BLES also includes "[a]ccess to operator services and directory assistance." R. C. § 4927.01(A)(1)(b)(v). Nowhere does the Act specify the required geographic scope or the contents of the telephone directory, direct the availability of free directory assistance in any circumstance, or require that a printed directory be provided to any customer. And, nowhere does the Act give the Commission the authority to impose such requirements. Rather, these are matters that the Act leaves to the local exchange carriers' discretion and to the competitive marketplace. The proposed rule is a holdover from current MTSS Rule 3 (O.A. C. § 4901:1-5-03), a rule that will be rescinded under Section 3 of the Act. The proposed requirements far exceed those that the statute prescribes.

Case No. 10-1010-TP-ORD, AT&T Initial Comments, August 30, 2010, pp. 16-17. The Commission did not address this directory scoping requirement in its 2010 Order.

The Commission did specifically state in its 2010 Order that it would ***revisit*** the requirement for providing a customer with a printed directory at no additional charge upon request. 2010 Order, p. 23. This requirement should be revisited now, as promised, and it should be eliminated. On review of these rules, the Commission should acknowledge that the scope of the directory and its contents (other than the required listings) are matters that are

outside the Commission's authority under the Act. As is the case with the charges for BLES installation and reconnection, these are matters that the Act has left to the marketplace. The Act does not specify the required geographic scope or the contents of the telephone directory, and it does not give the Commission the authority or discretion to impose these requirements. As such, the Commission should modify O.A.C. § 4901:1-6-15(A) to require only that a LEC providing BLES make available to its customers a telephone directory in any reasonable format, including but not limited to a printed directory, an electronic directory accessible on the internet or available on a computer disc, or free directory assistance. This approach would comport with the Act and would not exceed the Commission's power under it.

8. Rule 19 – Lifeline

Under Rule 19(L), an ILEC ETC shall provide written customer notification if a customer's lifeline service benefits are to be terminated due to failure to submit acceptable documentation for continued eligibility for that assistance and shall provide the customer an additional sixty days to submit acceptable documentation for continued eligibility or dispute the carrier's findings regarding termination of the lifeline service. AT&T recommends that the specified sixty day period be changed to thirty days to comport with the recently revised FCC rules and to be consistent with the waiver the PUCO previously issued relative to this timeframe.[5]

In proposed Rule 19(M) the Staff proposes to require the ILEC ETCs to implement a process under which, following any continuous 60-day period of nonusage, they would notify the customer through any reasonable means that he/she is no longer eligible to

[5] 47 CFR § 54.405(e)(4); Case No. 10-2377-TP-COI, Entry on Rehearing, June 20, 2012.

receive lifeline benefits. The ILEC ETC must afford the customer a 30-day grace period during which the customer may demonstrate usage. While the FCC requires that providers of wireless pre-paid lifeline service de-enroll subscribers for non-usage in this manner, there is no similar requirement applicable to wireline carriers who collect a monthly fee from subscribers. The FCC's rule is intended to address issues with pre-paid lifeline services where no fees are charged to the subscribers. (47 C.F.R. Section 54.405 (e)(3)). Wireline lifeline service is a flat rate, non-usage based service which does not lend itself to such monitoring or such a requirement. The customer pays a monthly fee whether they make one call or a thousand calls.

The basis for including this new proposal is not known, and it cannot be implemented without significant expense. Even if it were a good proposal, which it is not, it is also unclear why it would apply only to the ILEC ETCs and not other ETCs. The FCC has, in recent years, adopted new mechanisms to combat waste, fraud, and abuse in the Lifeline program. This proposal, while perhaps intended to be in the same vein, cannot be reasonably implemented by the ILECs and should therefore not be adopted for ILECs. However, if in fact this rule was intended to be applicable to CETCs, consistent with federal regulations, it would more appropriate for it to be included in division (T) of this rule.

Finally, Rule 19(T)(1) specifies the competitive eligible telecommunications carriers (CETCs) lifeline requirements, and indicates that the requirements found in paragraphs (B), (C), (D), (G), (H), (I), (J), (K), (L), (M), (N), and (O) of this rule apply to the lifeline service offered by any CETC, as applicable to the CETC's service offerings, unless exempted by the

rules or waived by the Commission. Paragraph (J), however, is only relevant to ILECs and should be removed from this list of cross-references.

9. Rule 26 - Moratorium on CLEC Disconnection

Division (I) of Rule 4901:1-6-26 provides as follows:

> No telephone company may discontinue services provided to a local exchange carrier (LEC) that has filed an application to abandon service prior to the commission ruling on such application to abandon service.

In its comments on that rule when it was first proposed, AT&T said:

> Proposed division (A)(8) appears to create a loophole through which an "abandoning" carrier could insist on the continuation of service even if it refused to pay for that service. This provision should be qualified with the addition of an introductory phrase, as follows: "Except in the case of disconnection for non-payment, no telephone company may discontinue services provided to an abandoning local exchange carrier (LEC) prior to the effective date that the LEC will abandon service."

Case No. 10-1010-TP-ORD, AT&T Initial Comments, August 30, 2010, p. 24. The rule creates an unfortunate loophole, allowing a CLEC to stop paying for wholesale services, while continuing to receive wholesale services from the underlying ILEC, and while continuing to provide retail services to its end users and collecting revenue from them during the entire pendency of the abandonment case.

The rule also creates a needless conflict with the carrier-to-carrier rules. The disconnection of carrier-to-carrier services is addressed in those rules, which provide in pertinent part as follows:

> If it is determined by the commission, that further investigation is warranted or that immediate termination may not be in the public interest, the commission or an attorney examiner may direct the aggrieved LEC to stay the termination for further investigation.

O.A.C. § 4901:1-7-27(B). Therefore, the Commission separately has the ability to delay disconnection, if necessary. There is no need to address this scenario in the retail rules, so the viability of this rule must be questioned.

The carrier-to-carrier rule quoted above also provides as follows:

> This rule is not intended to replace any default or dispute resolution provisions contained in an agreement between the LECs. Rather, it is an additional requirement should a default trigger the potential for termination of service(s) from the aggrieved LEC's network.

O.A.C. § 4901:1-7-27(B). This recognizes that the requirements of interconnection agreements should be recognized and enforced, something that retail rule 26(I) does not do.

The rule has the potential to cause undue delay when an ILEC is attempting legitimate collection action. It will also increase the potential for disputes and litigation. For example, a CLEC may have ordered collocation services or transport services with which no Ohio end users are involved. Imposing restraints upon the ILEC providing services will only result in additional financial losses for the ILEC and unfair advantage for the CLEC. The defaulting CLEC would only need to use this rule to delay disconnection without payment. The adopted rule would also create an incentive for a CLEC to file an abandonment application - - even without the intent of following through on the abandonment - - because the rule acts as a shield against possible and legitimate disconnection by the ILEC. Unfortunately, rule invites the unscrupulous to use the Commission's rules and processes to "game the system" and avoid their legal obligations.

It is also possible that completion of the abandonment proceeding could be delayed as a result of Commission action or actions taken or not taken by the defaulting CLEC. Once again, it is unfair for the serving ILEC to suffer additional financial losses due to the actions of others, especially if no end user basic service is affected.

Upon its review of these rules, the Commission should adopt AT&T's suggestion and modify the adopted rule to except from the rule situations where disconnection for non-payment is being pursued.

10. Rule 31 - Emergency and Outage Operations

The AT&T Entities adopt and support the comments of the Ohio Telecom Association on this rule.

11. Rule 37 – Assessments and Annual Reports

In Rule 37(C), the Staff proposes to assess a fee on wireless resellers of lifeline services in an amount to be determined by the Commission. An AT&T affiliate, Cricket Communications, Inc. is such a provider. The rule cannot be adopted because it is beyond the Commission's statutory authority to levy any assessment on wireless resellers of lifeline service. R. C. § 4905.10 specifies the Commission's power regarding assessments in support of its operations. That statute provides for the assessments to be made only against railroads and public utilities. A wireless reseller of lifeline service is not a "public utility" for this purpose and may not be subjected to any assessment. R. C. § 4927.01(A)(18) recognizes the subset of "wireless service provider" that is a telephone company and a public utility in Ohio. However, that definition is limited:

> "Wireless service provider" means a *facilities-based* provider of wireless service to one or more end users in this state.

R. C. § 4927.01(A)(18)(emphasis added). Under this statutory construct, a reseller is not a facilities-based provider and, therefore, cannot be a wireless service provider. Nor have the resellers historically been treated as telephone companies or as public utilities in Ohio. Only through a statutory change could the Commission extend its assessment power to wireless resellers of lifeline service. The proposed rule should not be adopted.

Conclusion

For all of the foregoing reasons, the Commission should rescind or modify the rules or its 2010 Order, as indicated, so it will faithfully implement the Act's provisions.

Respectfully submitted,

The AT&T Entities

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