

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS FILING FORM

(Effective: 04-01-2020)

Per the Commission's 5/29/2019 "Implementation Order" in Case No. 19-0173-TP-ORD

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 anyway.

In the Matter of the Application of AT&T Ohio to Increase)	TRF Docket No. 90-5032-TP-TRF
Residential Late Payment Charge)	Case No. 20-1801-TP-ATA
)	NOTE: Unless you have reserved a Case #, leave the "Case No." field BLANK.

Name of Registrant(s) The Ohio Bell Telephone Company

DBA(s) of Registrant(s) AT&T Ohio

Address of Registrant(s) 208 S. Akard St, Room 2510.02, Dallas TX 75202

Company Web Address www.att.com

Regulatory Contact Person(s) Richard T. Howell

Phone (214)757-8099

Fax (214)746-2232

Regulatory Person's Email Address rh2514@att.com

Contact Person for Annual Report Richard T. Howell

Phone () - -

Consumer Contact Information Richard T. Howell

Phone () - -

Address (if different from above) [Click here to enter text.](#)

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:

Sections I and II are pursuant to Ohio Administrative Code (OAC) 4901:1-6.

Section III – Part I - Carrier to Carrier is pursuant to OAC 4901:1-7 and Pole Attachment to OAC 4901:1-3

Section III – Part II - Wireless is pursuant to OAC 4901:1-6-24.

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 identified section of the Ohio Administrative Code Chapter 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the PUCO may be obtained from the PUCO's website at www.PUCO.ohio.gov under the docketing information system section (Procedural filing requirements), by calling the Docketing Division at 614-466-4095 or by visiting the Docketing Division at the offices of the PUCO.

(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:

Carrier Type: <input type="checkbox"/> Other (Explain below)	For Profit ILEC	Not for Profit ILEC	CLEC
Change terms & conditions of existing BLES.	<input type="checkbox"/> ATA <u>1-6-14(I)(2)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Introduce non-recurring charge, surcharge or fee to BLES	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)		<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Introduce or Increase Late Payment	<input checked="" type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Revisions to BLES Cap	<input type="checkbox"/> ZTA <u>1-6-14(E)</u> (0 day notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA <u>1-6-14(E)</u> (0 day notice)	<input type="checkbox"/> ZTA <u>1-6-14(E)</u> (0 day notice)	<input type="checkbox"/> ZTA <u>1-6-14(E)</u> (0 day notice)
Change BLES Rates	<input type="checkbox"/> TRF <u>1-6-14(E) & (G)</u> (0 day notice)	<input type="checkbox"/> TRF <u>1-6-14(E)</u> (0 day notice)	<input type="checkbox"/> TRF <u>1-6-14(H)</u> (0 day notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS <u>1-6-14(C)(1)(c)</u> (Auto 30 days)		
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day notice)	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day notice)	
Change in boundary	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF <u>1-6-08(G)</u> (0 day notice)
BLES withdrawal	<input type="checkbox"/> WBL <u>4927.10</u> (120 day notice)		<input type="checkbox"/> ZTA <u>1-6-25(B)</u> (0 day notice)
Other (explain):			

*Other exhibits may be required under the applicable rule, see the 4901:106-14(E) Filing Requirements on the PUCO's webpage for a complete list of exhibits.

Section I – Part II – Customer Notification Offerings Pursuant to Chapter 4901:1-6-07 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"/>
Date Notice Sent:				

Section I – Part III – Inmate Operator Service Pursuant to Chapter 4901:1-6-22 OAC

Introduce New	Tariff Change	Price Change	Withdraw
<input type="checkbox"/> TRF (0 day notice)	<input type="checkbox"/> ATA (Auto 30 days)	<input type="checkbox"/> TRF (0 day notice)	<input type="checkbox"/> UNC (Non-Auto)

Section II – Part I – Carrier Certification – Pursuant to Chapter 4901:1-6-08 & 10 OAC and Competitive Eligible Telecommunications Carrier Designation (CETC) – Pursuant to Chapter 4901:1-6-09 OAC

ILEC (Out of territory)	CLEC	Telecommunications Service Provider Not Offering Local Service	CESTC	CETC
<input type="checkbox"/> ACE <u>1-6-08</u> (Auto 30-day)*	<input type="checkbox"/> ACE <u>1-6-08</u> (Auto 30-day)*	<input type="checkbox"/> ACE <u>1-6-08</u> (Auto 30-day)*	<input type="checkbox"/> ACE 1-6-10 (Auto 30-day)	<input type="checkbox"/> UNC 1-6-09 (Non-Auto)*

*Supplemental forms can be found on the PUCO webpage – [Telecommunications application forms](#).

Section II – Part II – Change in Operation or Ownership

Change in Operation or Ownership	ILEC	CLEC	Telecommunications Service Provider Not Offering Local Service
Abandon all services		<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)	<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)
Change of official name *	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0-day notice)
Change in ownership *	<input type="checkbox"/> ACO <u>1-6-29(E)(1)</u> (Auto 30 days)	<input type="checkbox"/> ACO <u>1-6-29(E)(1)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0-day notice)
Merger *	<input type="checkbox"/> AMT <u>1-6-29(E)(1)</u> (Auto 30 days)	<input type="checkbox"/> AMT <u>1-6-29(E)(1)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0-day notice)
Transfer certificate *	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0-day notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0-day notice)
FCC Authorized Change in Ownership or Merger	<input type="checkbox"/> CIO <u>1-6-29 (E)(2)</u> (0-day notice)	<input type="checkbox"/> CIO <u>1-6-29 (E)(2)</u> (0-day notice)	<input type="checkbox"/> CIO <u>1-6-29 (E)(2)</u> (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 PUCO webpage for a complete list of exhibits.

Section III – Part I - Carrier to Carrier (Pursuant to 4901:1-7) & Attachments to Utility Equipment or Rights of Way (Pursuant to 4901:1-3)

Carrier to Carrier	ILEC	CLEC
Interconnection agreement or amendment to an approved agreement	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 days)	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 days)
Request for arbitration	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)
Introduce or change carrier to carrier tariffs	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <u>1-7-04 or 05</u> (Auto 30 days)	
Changes in rates, terms & conditions to pole attachments, conduit occupancy and rights of way. (13-579-AU-ORD 11/30/16 Entry)	<input type="checkbox"/> ATA <u>1-3-04</u> (Auto 60 days)	

Section III – Part II – Facilities-based Wireless Service Providers (Pursuant to 4901:1-6-24)

Registration and Change in Operations*	<input type="checkbox"/> RCC <u>1-6-24(B)</u> (0 day notice)
Interconnection Agreement or amendment to an approved Agreement.	<input type="checkbox"/> NAG <u>1-7-07</u> (0 day notice)

***Change in Operations filing must be filed in the original RCC case designation code established during the registration process.**

Section IV. – Attestation

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

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.

Richard T. Howell

(Name)

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 Ohio Adm. Code 4901:1-6-7.

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

Executed on December 15, 2020 at Dallas, Texas

/s/ Richard T. Howell

December 15, 2020

*Signature and Title

Date

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

VERIFICATION

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

/s/ Richard T. Howell

December 15, 2020

*Signature and Title

Date

**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.*

File document electronically as directed in case number 06-900-AU-WVR
or

Send your completed Filing 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**

EXHIBIT A

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 greater than \$5.00 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)

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 \$7.50 will be applied to residential customer bills greater than \$5.00 (l) 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.

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, an LPC of \$6.50 will be applied to residential customer bills greater than \$5.00 which remain unpaid after the due date, except that the charge is not applicable as specified on Sheet 17, Part 2 Section 2, of P.U.C.O. No. 20. 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.

Effective January 15, 2021, the LPC on residential bills will change to \$7.50 and will be applied to residential customer bills greater than \$5.00 which remain unpaid after the due date, except that the charge is not applicable as specified on Sheet 17, Part 2 Section 2, of P.U.C.O. No. 20. 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.

The LPC fee amount of \$7.50 is consistent with the LPC fee charged by telephone other providers in Ohio. Some of the specific LPC charges are shown here:

- Frontier - \$7.50
- CenturyLink - \$8.00
- Altice/Suddenlink - \$10.00
- Xfinity Voice (Comcast) - \$10.00
- Cincinnati Bell - \$11.95
- Lingo Communications (formerly Birch Communications) - \$5.00

In addition to demonstrating the reasonableness of the amount of the LPC compared to industry peers, AT&T Ohio also submits that the proposed increase closely aligns with the rate of inflation between 2014 and 2020. According to the U.S. Labor Department's Bureau of Statistics, inflation increased consumer prices by 11% between 2014 and 2020. The current LPC rate (established in 2014) indexed by inflation would yield an LPC rate of \$7.21. The AT&T Ohio proposed LPC rate of \$7.50 closely aligns the AT&T rate with inflation.

LPCs represent an avoidable charge under the control of the customer. Assessment of LPC fees only occur if a customer does not pay their bill or pays after the due date. No customer must incur this charge so long as they pay on time. This charge does not change the monthly rate for the services to which a customer subscribes. AT&T Ohio submits 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 residential customers from 11/12/2020 to 1/9/2021.

Rate Notice

The Late Payment Charge rate will increase from \$6.50 to \$7.50 on or after 1/15/2021. The late payment charge will be applied to your account if any outstanding charges over \$5.00 remain after the due date. If you have any questions or to learn more about our money-saving services, please visit us at att.com or call 800.288.2020.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/15/2020 4:47:57 PM

in

Case No(s). 20-1801-TP-ATA, 90-5032-TP-TRF

Summary: Application application of AT&T Ohio to increase residential late payment charge electronically filed by Richard T Howell on behalf of AT&T Ohio