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VIA OVERNIGHT AND ELECTRONIC MAIL

Cynthia G. Wilson-Frias
Senior Legal Counsel
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket 4060 – Rules Regarding Residential Collections Procedures by
Local Exchange Carriers in Rhode Island

Dear Ms. Wilson:

I am writing to respond to the three (3) follow-up questions asked of AT&T during the workshop relating to the rules regarding residential collections procedures by local exchange carriers in Rhode Island held on May 12, 2009.

With regard to Part II – DEPOSITS, Section 2.7, AT&T recommended deleting the phrase “how the deposit amount is determined” because it believes that it is an unnecessary requirement that is not consumer friendly. If a customer inquires about the calculation of a deposit amount, AT&T explains how the deposit amount was calculated. AT&T does not believe that it should be required to provide this information unless specifically asked by the customer.

In terms of how AT&T would implement the use of advance payment in situations with uncharacteristically high toll usage (Part III – PAYMENT REQUIREMENTS, Section 3.3), AT&T recommends deleting the specific dollar threshold and instead, allowing for the use of advance payment in situations where there is a material change in a customer’s calling pattern. This change would allow for reasonable latitude in implementation that is more customer-specific, and also, it would provide AT&T additional flexibility to engage customer-protective fraud detection software and other technology that triggers alerts on unusual spikes and/or changes in a customer’s calling patterns.



Finally, with regard to payment plans, AT&T recommended extensive revisions to this section (Part VI) in order to streamline the section. AT&T believes that payment plans should be by agreement between AT&T and the customer because the circumstances vary from customer to customer and there is not a "one size fits all" solution. As a result, the section should be modified as suggested to allow AT&T to work with its customers to develop reasonable plans that are customer-specific.

If you have any questions or require additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly J. Gold". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kimberly J. Gold