STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 2, 2006

By Hand Delivery

John M. Leutza, Director
Telecommunications Division
California Public Utilities Commission
505 Van Ness Avenue, Room 3210
San Francisco, California 94102

Re: Joint Protest of AT&T California's Advice Letter 28800 ("Disclosure elimination from A2 and D7 tariffs").

Dear Mr. Leutza:

The Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN") hereby protest AT&T California's (AT&T) Advice Letter 28800. Notice of this Advice Letter appeared on the Commission's Calendar on September 15, 2006; thus this protest is timely filed. In short, AT&T's Advice Letter proposes to eliminate the so-called "Rule 12" disclosure and fairness rules ordered by this Commission in D.01-09-058 as a remedy specific to marketing practices in which the utility had repeatedly engaged. This order has not been modified, is still in effect, and cannot be changed by Advice Letter.[1]

DRA and TURN lodge this protest on both procedural and substantive grounds.[2] Procedurally, AT&T is seeking to use the Advice Letter process improperly for matters that should be subject

[1] In fact, the particular Rule 12 requirements of Ordering Paragraphs 7-10 of D.01-09-058 were *expanded* on rehearing, to contain additional protection to consumers in Ordering Paragraph 8, as noted in the footnote appended to recitation of Ordering Paragraph 8 below. See D.02-02-027 at Ordering Paragraph 6(s).

[2] D.05-01-032 sets out the rules related to advice letters, and protests of same. DRA and TURN rely on sub-sections 2–3 and 5-6 Rule 4.2:

(2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;

(3) The analysis, calculations, or data in the advice letter contain material errors or omissions;

…

(5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or

(6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory …

to a greater level of scrutiny; AT&T should properly file either an Application to Amend Rule 12(as adopted by Commission Resolution No. T-16650), *or* a Petition for Modification of D.01-09-058.

DRA and TURN also protest because of the nature of the substantive rule changes proposed in AT&T's Advice Letter. These changes pose a real and immediate threat to substantial numbers of consumers who still depend on AT&T for basic telephone service. They roll back the clock to a time when AT&T's predecessor, Pacific Bell, had *carte blanche* to market as aggressively as it saw fit to sometimes vulnerable local exchange customers. The Commission subsequently found that AT&T/Pacific repeatedly abused this power, mixing required customer service with high-powered and misleading marketing pitches. There is no reason to believe that AT&T/Pacific will not continue its history of abusive and aggressive marketing (set out below). DRA notes that UCAN supports DRA and TURN's filing here, and is filing a separate protest, a protest which sets out a continuing pattern of abusive behavior towards customers.

AT&T claims that the changes announced in AL 28800 are "made in accordance with D.06-08-030, the Commission's Uniform Regulatory Framework (URF) Decision." Specifically, the Company states that the Advice Letter is allowed by the wording of D.06-08-030 "which eliminates asymmetric marketing, disclosures and previously mandated administrative processes." (AL 28800 at 1.)

AT&T's claims are incorrect on at least two counts. First, the tariffs proposed to be eliminated are not the sort of asymmetrical marketing regulations contemplated by D.06-08-030, but rather a discrete remedy for specific violations of consumer protection laws. Second, there was no notice in the URF proceeding, or elsewhere, that the Commission intended to change the remedies it had ordered against Pacific in D.01-09-058. Public Utilities (P.U.) Code section 1708 mandates notice to affected parties and the opportunity to be heard to effect such changes.

<u>What AT&T's Advice Letter Purports to Do</u>

AT&T's Advice Letter unilaterally *eliminates* a number of disclosures specifically ordered and approved by this Commission to insure that customers received clear and neutral information from the telephone utility of last resort.

AL 28800 would *eliminate* the following language from Schedule Cal. P.U.C. No. A2, Section K, Product Grouping:

> The Utility shall make available [separately] each product and/or service that make up these [bundled product] groups along with the rate and charge information for each individual product and/or service. The Utility shall inform its customers that the components of a product/service grouping may be purchased individually.

From the same Schedule at 2.1.12, Rule No. 12, "Disclosure of Rates and Charges and Information to be provided to the Pubic," AL 28800 would *eliminate* the following notices:

> A notice, indicating the point at which such schedules [of "rates and charges billed by and paid to the Utility for telephone service"] are available, will be posted in a conspicuous place in each of the offices of the Utility and the offices of the Utility's agents where patrons receive attention.
>
> Each such explanation of the available residence exchange access (including Lifeline Telephone Service) services shall include a quotation of the applicable recurring rates, nonrecurring charges applicable to each such residence service and whether or not the residential line the customer is purchasing is to be the primary line to the household.

Similarly, a further required sequence of disclosures in response to inbound residential customer requests would be *eliminated*: resolution of the customer's request first; indication to the customer that the requested order is complete; seeking the permission of the customer to present marketing information on other services unrelated to the customer's request; and agreement of the customer that additional marketing information be presented.

In the case of this last requirement, if agreement to present marketing information is obtained, then the Utility "may ask the customer for permission to access CPNI." This requirement is *eliminated*. Gone also is the requirement that "the Utility must inform the customer that the components ["of each service offered"] are available separately and quote component prices." The requirement that these disclosures "shall apply to outbound marketing calls as well as inbound" is also struck from Rule 12.

AL 28800 would also *eliminate* the required sequence of disclosures to be made in response to inbound residential calls from customers returning to the Utility from a competitor, customers wanting to disconnect, and customers who have not yet chosen a blocking option. *Eliminated* is the requirement that the Utility "shall disclose non-misleading information…" *Eliminated* also is the requirement that "quotation of applicable rates and charges shall be stated separately for each optional service designated by the customer."

AL 28800 also *eliminates* the requirement that "At the time a customer requests a change or addition to their existing service, the Utility or its authorized employees shall provide the customer with a quotation of the applicable recurring rates and nonrecurring charges for the requested change or addition."

Similarly, AL 28800 *eliminates* the requirement that "At the time of application for business service, or for moves, changes or additions to existing business services, the Utility or its

authorized employees shall provide a full itemization of the recurring rates and nonrecurring charges applicable to the services applied for."

Finally, AL 28800 *eliminates* the requirement that within two working days of a completed order the Utility must supply a confirmation letter "setting forth a brief description of the services ordered and the specific recurring rates and nonrecurring charges…"

DRA and TURN's Protest

1. **The Rule 12 Disclosures Were Ordered by D.01-09-058, Specific to Pacific/AT&T, as a Remedy for Pacific's Repeated Abuse of its Customers**.

The Tariff Rule 12 disclosures were required by the Commission's Decision in a consolidated series of cases against AT&T's predecessor, Pacific Bell, filed by two public interest groups and the union representing Pacific's customer service representatives.[3] Customer service witnesses described inordinate pressure to "sell up" even in situations where the customer was calling because of financial distress and/or a delinquent bill.[4] Customers complained that they were first sold the most expensive plans, with misleading names like "the Basics."[5] Customer complaints dovetailed with testimony by Pacific's own service representatives who felt that they could not in good conscience continue with the aggressive and abusive marketing programs described in D.01-09-058.[6]

---

[3] As noted in following footnotes, complaints were filed by Utility Consumers Action Network (UCAN), Greenlining Institute and Latino Issues Forum, and by a union representing Pacific's customer service representatives.

[4] D.01-09-058, Slip Op. at 12:

> Sharon Bogisich, Pacific Bell service representative, testified about the new requirements for her job. Specifically, she must now offer certain services on every call, regardless of customer need, the highest cost packages of services first; overcome customer objections to those offers; fall back to lower cost packages only after customer rejection; and observe prohibitions and restrictions on disclosure of relevant and complete information. Bogisich believes these job requirements place the service representative in an adversary role to the customer. Carrie Pelinka and Rose De Trinidad, Pacific Bell service representatives, provided testimony that echoed Bogisich's. Diane Greene, Pacific Bell service representative currently assigned to the Bay Customer Appeals Team, concluded that the package sales complaints she handles are not the result of mistakes by the customers, but are due to customers simply not knowing that their account has been charged for several services.

See also *Id.* at 49-50 ("offer on every call"), 56, *passim.*

[5] *Id.* at 3, 7, 39, *passim.*

[6] See footnote 4 above. One of the consolidated cases was *Telecommunications Union, California Local 103, International Federation of Professional and Technical Engineers, AFL-CIO (TIU) v. Pacific Bell*, C.98-06-049. Complaint was also filed by Greenlining Institute and Latino Issues Forum on behalf of

This was not the first (or last) time that Pacific Bell had been found to violate basic canons of fair, just, and reasonable business practices:

> The seriousness of Pacific Bell's wrongful conduct is compounded by the fact that Pacific Bell engaged in similar conduct that we declared unlawful in the 1986 marketing abuse case. Indeed, we are struck by what appears to be a disturbing pattern of compliance during periods of special oversight, only to be followed by noncompliance in furtherance of Pacific Bell's revenue goals when the special oversight ends.[7]

The Commission then described in detail Pacific's history of abusive marketing[8] More recently, various affiliates of the AT&T corporate family have also been found to be in violation of basic consumer protection laws.[9]

Decision 01-09-058 required the Rule 12 disclosures "to ensure customer service requests are fulfilled prior to subjecting customers to marketing pitches." D.01-09-058, Slip Op. at 2. The

---

low-income and language minority customers who had been victimized by Pacific's conduct. C.98-06-003.

[7] D.01-09-058, Slip Op. at 80-81.

[8] *Id.*.at 18:

> The Commission has previously addressed the requirements of Tariff Rule 12, and other marketing issues, in a series of decisions stemming from Pacific Bell's general rate case filed in 1985 (Application (A.) 85-01-034). As part of the rate case investigation, Commission staff members uncovered a number of marketing actions which staff believed violated provisions of the Public Utilities Code and Pacific Bell's tariffs. Staff reported these potential violations to the Commission. After a hearing, the Commission issued a decision directing Pacific Bell to cease and desist from: conducting an unauthorized trial program for enhanced services, engaging in "package selling abuses," violating Tariff Rule 6 in establishing credit, renaming basic service, and improperly administering the Universal Service Program. The Commission also ordered Pacific Bell to refrain from any cold selling telemarketing and from implementing any sales quota systems. (D. 86-05-072, 21 CPUC2d 182.) In a series of decisions issued over several years, the Commission subsequently ordered Pacific Bell to refund over $62 million to customers (as of November 1988) and to contribute $16.5 million to the Ratepayer Education Trust Fund. Pacific Bell's marketing practices were also placed under the guidance of the Customer Marketing Oversight Committee. (D.90-02-043, 35 CPUC2d 488, 500.) The entire series of decisions is known colloquially as the "Pacific Bell marketing abuse case" or the "cease and desist order."

[9] *See, e.g., Investigation of Cingular…,* D.04-09-062, *aff'd sub nom. Pacific Bell Wireless v. California Public Utilities Commission,*140 Cal. App. 4th 718 (2006); see also D.02-10-073($27 million settlement for Pacific/SBC unauthorized charges for DSL).

Commission found "that Pacific Bell failed to inform customers adequately and thereby deprived them of meaningful choices…" D.01-09-058, Slip Op. at 1. The Commission specifically ordered Pacific to adopt a new and more adequate Rule 12 disclosure system:

> 7 Within 45 days of the effective date of this order, Pacific Bell shall file an advice letter modifying Tariff Rule 12 to create a clear distinction between customer service and sales or marketing efforts in conformance with the directives set out in Ordering Paragraph 8 and as described in Section 9.3 of this order. This rule shall remain in effect so long as Pacific Bell serves 60% or more of residential access lines.
>
> 8. Revised Tariff Rule 12 shall provide that service representatives who answer inbound customer service calls must first fully address and resolve the customer's request. The service representative must describe the lowest-priced option for purchasing the requested services. After completely addressing all the customer's requests, the service representative shall summarize the customer's order including itemized prices, and inform the customer that the order is finished. After that, the service representative may inquire whether the customer is interested in hearing about other optional services. If the customer responds in the affirmative, only then may the service representative engage in unsolicited sales or marketing efforts.[10]
>
> 9. Pacific Bell shall train its managers and service representatives on implementation of Ordering Paragraph 8.
>
> 10. Revised Tariff Rule 12 shall be prominently displayed in the work area of service representatives.

D.01-09-058, Ordering Paragraphs 7-10. D.01-09-058 was reaffirmed by the Commission in D.02-02-027.[11]

These two Decisions were followed up with Resolution No. T-16650, where the Commission addressed whether Pacific's initial modification of Rule 12 met the requirements of the relevant

---

[10] This obligation was actually expanded on rehearing, so that the last sentence now reads (additional language in italics), "If the customer responds in the affirmative, only then may the service representative engage in unsolicited sales or marketing efforts, *or request the release of CPNI*."

[11] Order Granting Limited Rehearing and Modifying Decision 01-09-058.

ordering paragraphs of D.01-09-058, the Commission noted that this original complaint decision's order regarding Rule 12 was intended "to create a clear distinction between [Pacific's] customer service and sales or marketing efforts." Resolution No. T-16650 "put Pacific on notice that if Pacific further fails to comply with this Commission resolution and/or fails to fully comply with the Commission D.01-09-058 as amended by D.02-02-027, Pacific will be subject to penalties in accordance with P.U. Code Sections 2107 and 2108." Resolution No. T-16650 at 11. Nothing in the URF decision, D.06-08-030, withdraws or rescinds this notice to Pacific/AT&T.

The disclosures reflected in Rule 12 remain necessary to this day. There is still a significant class of consumers that look to the incumbent local exchange carrier as their basic telephone provider and portal.[12] In many cases, these may be the least sophisticated consumers, most susceptible to the hard sell.[13] AT&T/Pacific has made no showing that the situation that existed for vulnerable consumers in 2001 no longer exists. Indeed, if such a showing were to be made, it should not be made by advice letter, but by Petition to Modify D.01-09-058 or an application to amend Resolution T-16650.[14]

2. Decision 06-08-030 Does Not Authorize the Withdrawal of Rule 12 Disclosures.

AT&T California claims in AL 28800 that the authority for the eliminations of disclosures in its tariffs rests in D.06-08-030, which, as the Advice Letter states, "eliminates asymmetric marketing, disclosures and previously mandated administrative processes." This paraphrase is a reference to the following language in D.06-08-030:

---

[12] Indeed, Pacific/AT&T is still well within the threshold set by D.01-09-058 Ordering Paragraph 7: "This rule shall remain in effect so long as Pacific Bell serves 60% or more of residential access lines" in its territory.

[13] There was substantial evidence in the consolidated cases against Pacific Bell that the utility had to some extent targeted language minorities for aggressive and sometimes misleading marketing. *See e.g.,* D.01-09-058 at 72-74.

[14] In this regard, AT&T's instant Advice Letter violates the rules set out in D.05-01-032, particularly Rule 2.2 which provides:

> In addition, if an advice letter requests a change to a Commission resolution addressing a prior advice letter of the utility, the new advice letter shall specify the resolution to which a change is requested, and shall set forth the following information by way of notice:
>
> > (9) The advice letter is subject to Public Utilities Code Section 1708, which states in pertinent part that the Commission may, "upon notice to the parties, and with opportunity to be heard as provided in the case of complaints, rescind, alter, or amend any order or decision made by it."

> Finally, we eliminate all asymmetric requirements concerning marketing, disclosure, or administrative processes. If a more restrictive marketing, disclosure, or administrative requirement applies to an ILEC, then the ILEC can modify its tariffs to conform to those of a CLEC. Similarly, if a more restrictive marketing, disclosure, or administrative requirement applies to a CLEC, then the CLEC can modify its tariffs to conform to those of an ILEC. Conditions adopted in this decision that account for subsidization of basic residential service are exceptions to this general policy.

D.06-08-030, Slip Op. at 221-222. As this passage makes clear, the asymmetric requirements referenced in D.06-08-030 are between *classes* of telephone providers, and do not address specific remedies applied to a single company for proven violations of consumer protection laws.

Although the Commission does not precisely define "asymmetric requirements" in D.06-08-030, there is no evidence in the decision that this term was intended to relieve Pacific of disclosure obligations designed as a remedy for specific conduct. The Rule 12 requirements are *sui generis,* specific to Pacific/AT&T because the practices Rule 12 sought to cure were specific to Pacific/AT&T.

Stated differently, the Commission's ruling in D.01-09-058 was not based on Pacific's status as an ILEC or a NRF company; it was instead due to a finding that the utility had a pattern of abusing its customers and violating consumer protection laws. If AT&T can use the URF ruling to simply wave off existing injunctive orders of this Commission, past remedies addressing violations of cramming and slamming or CEQA regulations would also be at risk as "asymmetric regulation." To rebrand case-specific remedies as asymmetric regulation, as AT&T here does, would in fact cripple law enforcement by allowing repeat violators to hide behind the fact that their misdeeds created a *prima facia* asymmetry and therefore put them beyond the reach of the law.

In short, AT&T's present Tariff Rule 12 was required by Commission decision and adopted by Commission resolution, both resulting from a complaint case and not as a result of general rules pertaining to a class of utilities. Rule 12 is not an example of the type of asymmetrical regulation the URF decision was intended to eliminate, and D.06-08-030 therefore provides no authority for AT&T to unilaterally rescind its current Rule 12 via advice letter.

3. There Was No Notice – in the URF Proceeding or Elsewhere – that the Commission Intended to Modify D.01-09-058.

Furthermore, the URF decision did not provide notice that it was intended to rescind penalties derived from complaint cases. P.U. Code 1708 provides that

> The Commission may at any time, *upon notice to the parties*, and with *opportunity to be heard as provided in the case of complaints*, rescind, alter, or amend any order or decision made by it. Any order rescinding, altering, or amending a prior order or decision shall, *when served upon the parties*, have the same effect as an original order or decision. (Emphasis added.)

Clearly, AT&T cannot point to any notice to the parties to the complaint proceeding resulting in D.01-09-058 that the decision would be modified or overturned in the URF proceeding, or that it had in fact been rescinded by D.06-08-030. Nor was an order rescinding, altering, or amending D.01-09-058 served on the parties to that proceeding. It is well established that the Commission cannot rescind, alter or amend prior orders or decisions without notice and opportunity to be heard.[15] There was no such notice in the URF proceeding that produced D.06-08-030. Even had there been such notice, however, one of the key parties to D.01-09-058 – the Utility Consumer Action Network (UCAN) -- was not on the service list of the URF proceeding, and reports to DRA and TURN that it has received no notice whatsoever that the Commission intended to modify D.01-09-058.[16] Nor *could* UCAN have received constructive notice that the Commission intended to eliminate Rule 12 because 1) the elimination of Rule 12 was beyond the scope of the URF OIR, and 2) UCAN did not participate in the URF proceeding in any way. For the utility to act as though it were the Commission, and attempt to provide such notice *ex post facto* via advice letter, is without precedent in Commission practice.

Appeal by the Company to P.U. Code Section 1708.5 would be equally unavailing. Section 1708.5(f) provides that

> Notwithstanding Section 1708, the commission may conduct any proceeding to adopt, amend, or repeal a regulation using notice and comment rulemaking procedures, without an evidentiary hearing, *except with respect to a regulation being amended or repealed that was adopted after an evidentiary hearing*, in which case *the parties to the original proceeding shall retain any right to an evidentiary hearing* accorded by Section 1708. (Emphasis added.)

---

[15] See, *California Trucking Assn. v. Public Utilities Commission*, 19 Cal.3d 240 (1977). See also D.84-07-103, 1984 Cal. PUC LEXIS 993; D.90-12-067, 1990 Cal. PUC LEXIS 1386; D.92-06-069, 1992 Cal. PUC LEXIS 972; D.93-08-027, 1993 Cal. PUC LEXIS 519; D.94-09-076, 1994 Cal. PUC LEXIS 659; D.94-10-037, 1994 Cal. PUC LEXIS 694; D.95-03-043, 1995 Cal. PUC LEXIS 288; D.95-07-054, 1995 Cal. PUC LEXIS 604; D.96-09-099, 1996 Cal. PUC LEXIS 973; D.96-12-036, 1996 Cal PUC LEXIS 1097; D.97-08-059, 1997 Cal. PUC LEXIS 697; D.98-12-089, 1998 Cal. PUC LEXIS 917; D.98-06-075, 1998 Cal. PUC LEXIS 499; D.99-06-061, 1999 Cal. PUC LEXIS 317; D.99-12-023, 1999 Cal. PUC LEXIS 821; D.00-03-020, 2000 Cal. PUC LEXIS 215; D.03-04-061, 2003 Cal. PUC LEXIS 262; D.05-05-016, 2005 Cal. PUC LEXIS 172; D.06-06-071, and 2006 Cal. PUC LEXIS 237.

[16] DRA and TURN are informed and believe that UCAN will be filing its own protest to this affect.

AL 28800 cannot establish that the proposed elimination of Rule 12 disclosures meets this standard. The parties to the original proceeding have not been accorded their right to an evidentiary hearing respecting the repeal of D.01-09-058. Since AT&T is not acting under specific Commission authority sufficient to satisfy this standard, AL 28800 is an illegitimate exercise of authority by the company.[17]

4. AT&T's Advice Letter is Inconsistent with Commission Policy.

What AT&T is attempting to accomplish with its Advice Letter is also inconsistent with this Commissions recent amendments to G.O. 168, the "Consumer Bill of Rights Covering Telecommunications Services." One of the essential foundations of the Commission's recently re-configured Consumer Bill of Rights is the principle that consumers should have "adequate knowledge of product and service features when purchasing a telecommunications product or service."[18] Consistent with this principle, the Commission adopted, as part of the rights and principles for consumer protection, the following language relating to disclosure:

> Consumers have a right to receive clear and complete information about all material terms and conditions, such as material limitations, for i) products and service plans they select or ii) available products and service plans for which they request information.[19]

This is precisely what the Tariff Rule 12 disclosures accomplish – full disclosure to the consumer. And, this is precisely what AT&T is attempting to eliminate under the guise of removing "asymmetric" marketing requirements.

Conclusion

For all the reasons described above, A.L. 28800 should be rejected, and AT&T should be required to follow properly noticed and adequate procedures if it still seeks changes to Rule 12. It may well be that Rule 12 could use re-examination and updating, and that process could be accommodated by an Application to Amend Rule 12 as adopted by Resolution No. T-16650, *or* by Petition for Modification of D.01-09-058. An Advice Letter is a wholly improper and illegal means to achieve this result.

---

[17] The Commission has not, by specific order paralleling the order of D.01-09-058, conferred on AT&T the authority to rescind that decision. The Commission has not directly or indirectly delegated to AT&T the discretion to decide which Commission regulations to obey and which to ignore. Indeed, the Commission has not conferred such authority on Commission staff. For AT&T to assume that it has such discretion is illegitimate.

[18] D.06-03-013 slip opinion p. 49.

[19] G.O. 168

Indeed, allowing the wholesale elimination of the disclosure requirements of D.01-09-058 by advice letter not only runs afoul of procedural safeguards designed to protect consumers, it virtually guarantees aggressive marketing campaigns like we have seen in the past. The Commission would be inviting the Company to engage in the abusive behavior Rule 12 was intended to prevent. This would be at the expense of AT&T's customers, not the Company. In Resolution No. T-16650 the Commission took note of Pacific's internal Code of Business Conduct, remarking that the Code of Conduct "has been in place for some time and so far it has not deterred Pacific from its unfair, misleading and predatory sales practices that are addressed in D.01-09-058." The Commission noted, that Pacific's internal Code of Business Conduct made "no reference at all to unfair, misleading and predatory sales practices." Resolution No. T-16650 at 5. AT&T makes no showing that the corporate culture referenced in Resolution T-16650 has changed in any way as it passed in an unbroken line from Pacific to SBC to AT&T. Without appropriate rules in place, the most reasonable inference is that AT&T will repeat past behavior. DRA and TURN urge the Commission to reject this Advice Letter.

If you have any questions regarding this protest, please contact:
Bill Johnston, Jr. for DRA at (415/703-2256; wej@cpuc.ca.gov), or
Bill Nusbaum for TURN at (415-929-8873; bnusbaum@turn.org).

Yours truly,

Denise Mann, Senior Manager,
Telecommunications Branch, Division of Ratepayer Advocates
Chris Witteman, Staff Counsel

William R. Nusbaum, Senior Telecommunications Attorney,
The Utility Reform Network (TURN)

Cc: Dana Appling, Director, DRA

TD_PAL@cpuc.ca.gov
regtss@att.com
Rhonda Johnson, AT&T California
AT&T California Advice Letter Service List