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Edward J. Fitzgerald General Attorney

July 20, 2009

VIA FACSIMILE AND U.S. MAIL

(860) 808-5593

The Honorable Richard Blumenthal Attorney General State of Connecticut 55 Elm Street Hartford, Connecticut 06106

Re: Blocking Option for Third Party Billing Aggregators

Dear Attorney General Blumenthal:

AT&T has reviewed your letter of July 16, 2009. AT&T is proud of the many measures it has taken and continues to take to combat cramming. As your letter indicated, AT&T generally fully credits any customer's bill for any disputed third party billing. AT&T currently offers third party billing blocks to Connecticut customers on an ad hoc basis. Consistent with your request, AT&T will create a uniform process to offer third party bill blocking at no charge to all Connecticut customers upon request. AT&T believes the process can be implemented by September 30, 2009.

The new uniform procedure will be that upon receipt of a customer bill block request, AT&T will notify the third-party billing customer (aggregator or service provider) to cease submission of charges for the requesting end user's account. Average interval from customer request to bill block activation will be two business weeks. Intervals may fluctuate based on volumes. AT&T proposes the following steps to implement this uniform process:

- AT&T will work with its call centers to develop guidelines and training for the call center representatives to use for customer calls. The guidelines will include requirements of the manual bill blocking process, including the information needed to effectuate blocking and the process and/or forms used to submit the information, as well as the manner in which it will be sent to the clearinghouses.
- Manual bill block procedures will be developed.
- Manual bill block training for call center representatives will be developed and delivered.

- Effective no later than September 30, 2009, AT&T Connecticut will be ready to receive and process all customer requests for bill blocks.
- Once the process has been implemented, AT&T will submit accounts and telephone numbers to the named third party billers for blocking. Depending on volume, blocking should occur within two weeks after receipt of the customer request by AT&T.

Please note that that bill blocking will not prevent the billing charges that are already in the "pipeline" for processing at the time the block is imposed, so some charges may appear on the customers' bill following the bill blocking request. However, assuming the clearinghouses comply with AT&T's request (which AT&T believes they will do), no new charges will be submitted once a block is in place.

In the interim prior to September 30, 2009, AT&T will continue to recourse any disputed amounts of third party billing brought to AT&T's attention by its customers and will issue a full credit for the disputed amount on a subsequent AT&T bill. AT&T will also continue to recourse disputed amounts for those customers who do not request a third party bill block but dispute a third party charge on the AT&T bill.

I am available to discuss any questions your staff may have on this matter. I can also make available subject matter experts within AT&T to assist in any such discussions.

Thank you for bringing this matter to AT&T's attention.

Very truly yours,

Edward J. Fizgerald

cc: Phillip Rosario, Assistant Attorney General Valarie Bryan, Assistant Attorney General Mark Kerber, AT&T General Attorney