



STATEMENT OF AT&T CONNECTICUT

Regarding Committee Bill No. 505 An Act Concerning Unlisted Telephone Numbers Before the Committee on Energy and Technology March 5, 2009

Proposal:

Committee Bill No. 505 would prohibit a telephone company, such as AT&T, from charging a fee for an unlisted telephone number to any customer who (1) participates in the address confidentiality program established pursuant to chapter 968a of the general statutes, and (2) qualifies for local, state or federal public assistance.

Comments:

AT&T opposes Committee Bill No. 505 and urges the Committee to reject it.

AT&T understands the desire to assist those targeted by this bill to avoid the inclusion of their telephone listing information in the telephone directories. However, compliance with the bill would not be as simple as it may seem nor would it be as effective as its sponsors may believe.

It is important to note that today the directory and directory assistance are not the only sources for telephone listing information, including addresses. This bill could create a false sense of protection. Information that a customer provides, including telephone number/address, to catalogs, credit card companies, charge cards (i.e., Sears, Target, etc.) and many other sources are also available in the public sphere, including signing up for a sweepstakes at a grocery store. So, any attempt to remove all of a customer's information from directories and directory assistance would not prevent access to the information via other sources/avenues and unless there was a telephone number and address change, the information would still be available in older directories, including libraries that may have older versions on the shelves.

Moreover, the bill would only apply to telephone company directories. If this bill is enacted, all providers of directories containing address and/or telephone numbers should be subject to the same requirement to provide a vehicle to prevent disclosure of such information at no charge to the customer. There should not be rules for one provider versus another.

There are additional options/tools available, at no charge, to those wishing to tailor the appearance and visibility of their information, such as omitting the address or choosing to use an initial instead of a full name (i.e., Lisa Smith to L. Smith).

There are no similar exceptions currently to the charge for an unlisted telephone number in any jurisdiction. Accordingly, should the bill be adopted, implementation would take considerable time. The company would have to develop and implement modifications in

the IT system to allow for a new sub-group. Previous estimates have been that conversion could take up to one year.

The administrative aspects of a program like this are also problematic. For example, who will verify eligibility and who will monitor when circumstances change such that individuals no longer meet the eligibility requirements? The Company would not be in a position to make these determinations, for example – eligibility for public assistance.

The bill contemplates a rulemaking proceeding conducted by the Department of Public Utility Control. It will be vital that the Department have the authority and responsibility to consider and address these and other implementation issues that may arise.

Finally, no system is foolproof. Any legislation would need to include protection from lawsuits for inadvertent disclosure of the telephone listing information.

Conclusion:

AT&T opposes Committee Bill No. 505 and urges the Committee to reject it. Should the Committee determine that legislation is necessary, the Company requests the opportunity to work with the Committee to address the Company's concerns.