

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Proposed PSC Rulemaking)	
4 CSR 240-33.045 Requiring Clear Identification)	
and Placement of Separately Identified Charges)	Case No. TX-2005-0258
on Customer Bills.)	

ERRATA

Comes now, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (“SBC Missouri”) and respectfully files this Errata to correct two statements made in its Comments regarding Proposed Rule 4 CSR 240-33.045—Requiring Clear Identification and Placement of Separately Identified Charges on Customer Bills (“SBC Missouri’s Comments”) that SBC Missouri filed with the Missouri Public Service Commission on April 14, 2005, in the above-captioned case.

1. On page 8 of SBC Missouri’s Comments, SBC Missouri states: “SBC Missouri estimates that if it had to implement the information technology changes in order to allow such disclosures, it would incur non-recurring costs of approximately \$660,000, far in excess of the \$500.00 private cost estimate which accompanied the proposed rule.” SBC Missouri discovered that the private cost estimate was actually \$643,000. Thus, SBC Missouri seeks to amend the above-referenced sentence to read: “SBC Missouri estimates that if it had to implement the information technology changes in order to allow such disclosures, it would incur non-recurring costs of approximately \$660,000, in excess of the \$643,000 private cost estimate which accompanied the proposed rule.”

2. Additionally, on page 8 of SBC Missouri’s Comments, SBC Missouri states: “Moreover, such disclosures would be very costly, far in excess of the \$500.00

private cost estimate which accompanied the proposed rule.” SBC Missouri discovered that the private cost estimate was actually \$643,000. Thus, SBC Missouri seeks to amend the above-referenced sentence to read: “Moreover, such disclosures would be very costly.”

3. SBC notes that in its comments, it stated that in addition to the non-recurring costs that it would incur to implement information technology changes, it would incur additional costs as service representatives would have increased customer contact time to explain each and every item the customer could see on his or her bill. SBC Missouri previously advised the Staff of the Missouri Public Service Commission that it estimated that for each minute of increased service representative time to disclose taxes, surcharges, and similar fees, it would incur approximately \$500,000. SBC Missouri would need to know precisely what disclosures are required under the proposed rule in order to determine the actual amount of increased talk time. However, if one uses one minute as a conservative estimate, SBC Missouri would incur additional service representative labor costs of approximately \$500,000 in addition to the information technology costs of \$660,000 referenced above. This estimate of service representative labor costs was inadvertently omitted from SBC Missouri’s Comments Regarding Proposed Rule 4 CSR 240-33.045, which were filed on April 14, 2005.

Wherefore, SBC Missouri prays that the Commission consider its Errata to its Comments and eliminate or modify the proposed rule as outlined in SBC Missouri’s Comments, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Copies of this document were served on all counsel of record by e-mail on May 10, 2005.


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