

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

In the Matter of the Tariff Filing by SBC)
Long Distance, LLC, d/b/a AT&T Long) File No. TT-2012-0347
Distance.)

THE OFFICE OF THE PUBLIC COUNSEL’S RESPONSE

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response states as follows:

1. On March 30, 2012, SBC Long Distance d/b/a AT&T Long Distance (AT&T) made a filing with the Missouri Public Service Commission (Commission) seeking to “detariff” the service offerings in two of its existing tariffs on and after May 1, 2012, per Section 392.461. RSMo, which allows telecommunications companies to elect to be exempt from any requirement to file or maintain with the Commission tariffs or schedules of rates, rentals, charges, privileges, facilities, rules, regulations, or forms of contract for telecommunications services offered or provided to residential or business retail end user customers and instead be required to publish generally available retail prices for those services available to the public by posting such prices on a publicly accessible website.
2. On April 16, 2012, the Staff of the Missouri Public Service Commission (Staff) filed a Motion to Suspend Tariffs asking the Commission to suspend both tariff filings by AT&T.
3. On April 17, 2012, the Commission issued an Order Establishing Time to Respond ordering SBC to respond, and any other party who wished to respond, to Staff’s Motion no later than April 20, 2012.
4. Public Counsel has concerns regarding the fleeting nature of retail price information placed on a company’s website versus the documentation that an approved tariff filed with the

Commission provides to customers. Retail price information that is available on a website and relied on by a customer at the time the customer subscribes to service may be replaced over time without a viable way for that customer to prove that the change was made.

5. Therefore, Public Counsel requests that the Commission require AT&T to maintain sufficient documentation of each change in generally available retail price information for telecommunications services offered or provided to residential or business retail end user customers that is made on its website.

WHEREFORE, the Office of the Public Counsel respectfully submits its response.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 19th day of April 2012:

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