

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

In the Matter of Southwestern Bell Telephone	)	
Company, d/b/a AT&T Missouri's Application	)	
for Waiver of the General Distribution	)	Case No. IE-2009-0357
Requirement of White Page Directories Under	)	
4 CSR 240-32.050(4)(B).	)	

**JOINT AFFIDAVIT OF MICHAEL J. BARRY AND CRAIG A. UNRUH  
IN SUPPORT OF AT&T MISSOURI'S APPLICATION FOR WAIVER**

This Joint Affidavit supports AT&T Missouri's<sup>1</sup> application for waiver of the general distribution requirement for white page directories under 4 CSR 240-32.050(4)(B). Specifically, AT&T Missouri in this proceeding has sought the option to cease the mass distribution of printed residential white page directories to all households and businesses in its service territory without regard to whether the customers need or use the books, and instead seeks authority to provide them to customers only upon request and at no charge.

**JOINT AFFIDAVIT**

1. My name is Michael J. Barry. My business address is 100 E. Big Beaver Road, Troy, Michigan 48083. I am employed by Ameritech Publishing, Inc. and serve as its Director-External Affairs. I am responsible for advocating regulatory policy with respect to AT&T's directories and supporting regulatory compliance by AT&T's Directory Unit.
2. My name is Craig A. Unruh. My business address is One AT&T Center, Room 3528, St. Louis, Missouri 63101. I am employed by AT&T Services, Inc. and serve as Executive Director-Regulatory. I am responsible for advocating regulatory policy and managing AT&T's regulatory organization in Missouri.
3. AT&T Missouri has sought a waiver of the telephone directory delivery requirement contained in 4 CSR 240-32.050(4)(B) in order to have the option to provide paper copies of the residential white page telephone directory to households and businesses in its service territory only upon request and at no charge. AT&T Missouri, however, has

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<sup>1</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

agreed to limit the scope of its requested waiver to households and businesses in its Metropolitan Calling Area (“MCA”) service territories in Kansas City, Springfield and St. Louis, Missouri.

4. AT&T Missouri proposes to implement its new method of providing residential white page directories initially in the St. Louis and Kansas City, Missouri markets. In these markets, the new method of distributing residential white page directories will consist of the following:
  - AT&T Missouri will deliver the respective AT&T Real Yellow Pages directory to all households and businesses within its service territory in the Kansas City and St. Louis, Missouri Metropolitan Calling Areas.
  - The AT&T Real Yellow Page directories will contain the business white page listings, the Government listings, the customer guide information and other information required under the Commission’s Rules.<sup>2</sup>
  - On the first delivery cycle of any white page directory impacted by this change, a ride-along communication piece will be provided in the delivery bag with the business white pages and the AT&T Real Yellow Pages explaining the options available for requesting and accessing free residential white pages listings, specifically informing customers they can receive a printed white pages directory containing residential listings by calling a toll free 800 number.
  - The requested white page directories will be provided (e.g., mailed) at no cost to any household or business within AT&T Missouri’s service territory in the respective MCA<sup>3</sup>.
  - A description of the new plan for distributing residential white page directories and the options by which customers can acquire and access directory content, including the toll free number to request a free printed copy of the residential white pages listings will be prominently placed in two locations in the directories:

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<sup>2</sup>Rule 240-32.050(4) requires telephone directories, in addition to “the names of all customers, their most definitive addresses, if available, and their telephone numbers,” to include:

(C) The name of the company, an indication of the area included in the directory and the month and year of issue shall be displayed prominently on the outside, front cover of each directory. Information pertaining to emergency calls (police, fire, etc.) and location of the company’s public business office or related toll-free number shall appear conspicuously in the front part of the directory pages;

(D) The directory shall contain instructions for utilizing the Telecommunications Relay Service, and for placing local and long distance calls, calls for repairs and directory assistance and calls to the company’s business office appropriate to the area served by the directory. The directory shall also include the address and telephone number of the Public Service Commission and its consumer services department, and the address and telephone number of the Office of the Public Counsel;

<sup>3</sup> This includes households and businesses who are not AT&T Missouri telephone customers (e.g., wireless only customers, CLEC customers, etc.).

(1) in the customer call guide in the front section of the AT&T Real Yellow Pages directory and (2) on a stiff tab insert in the AT&T Real Yellow Pages directory.

- AT&T Missouri will work with the media in affected markets to help educate customers about the change and how they can request a directory if desired.
5. AT&T Missouri will also provide its customers with the ability to choose how they access and use white pages listing information by providing this information in multiple formats. Where AT&T Missouri's proposal is implemented, AT&T Missouri agrees to make free residential listing information available to consumers across these multiple platforms:
- [www.realpageslive.com](http://www.realpageslive.com)
  - [www.yellowpages.com](http://www.yellowpages.com)
  - Print copy (upon request)
6. AT&T's directory website, [www.RealPagesLive.com](http://www.RealPagesLive.com), will provide online access to directory information in the traditional directory format, with the same look and feel of the printed directory, but with capabilities not possible with a printed version, such as adjusting the size of the font or performing electronic searches. In addition, customers will be able to access their local directory from any location where they can establish an Internet connection. All of the existing directory information will be located on this site, including residential white pages listings, business white pages listings, government listings and the Customer Guide, which contains the information required by Commission Rules. This website will also include access to the AT&T Real Yellow Pages and every AT&T directory in 21 states, providing customers with access to more directory information than they currently receive.
7. The Commission's grant of the requested waiver will have no impact on the service AT&T Missouri provides to customers with nonlisted or nonpublished service. Customers with nonlisted service will continue to have their directory information excluded from the printed and electronic white pages telephone directory. Customers with nonpublished service will continue to have their directory information excluded from the printed and electronic white pages telephone directory, as well as from AT&T Missouri Directory Assistance ("DA") service and from the data AT&T is required to make available to other DA providers.
8. The requested waiver deals only with the method of delivering white page residential directories. AT&T employees represented by the Communications Workers of America (CWA) are not and have not been involved in the printing of the directory or in its door-to-door delivery. Rather, that work is performed by outside vendors. While CWA employees are involved in preparing the residential white page telephone directories for release to the printer, that work will still need to be performed because AT&T Missouri plans to continue producing white page residential telephone directories.
9. The Commission's grant of the requested waiver will have no impact on the arrangement under which AT&T Missouri currently provides printed residential white page directories

to the independent local exchange telephone companies that provide telephone service within the MCAs.


10. AT&T Missouri will use the same process to provide printed residential white page directories for CLEC customers residing within AT&T Missouri's service territory as it will use for its own customers.
11. This concludes our Affidavit.

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF OAKLAND )

I hereby swear and affirm that the statements contained in this joint affidavit are true and correct to the best of my knowledge and belief.

  
Michael J. Barry

Subscribed and sworn to before me this 8<sup>th</sup> day of June, 2009.

  
Notary Public

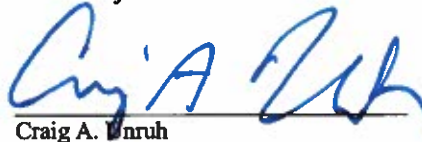
My Commission Expires:



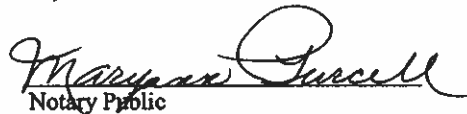
SHARON PAMPALONA  
Notary Public, State of Michigan  
County of Macomb  
My Commission Expires Dec. 08, 2014  
Acting in the County of Oakland

STATE OF MISSOURI )  
 ) SS  
CITY OF ST. LOUIS )

I hereby swear and affirm that the statements contained in this joint affidavit are true and correct to the best of my knowledge and belief.

  
Craig A. Wnruh

Subscribed and sworn to before me this 8<sup>th</sup> day of June, 2009.

  
Notary Public

My Commission Expires: January 13, 2012

