

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Measures Designed to Assist US Wireless)
Consumers to Avoid Bill Shock) CG Docket No. 09-158
)
)
)

COMMENTS OF AT&T, INC.

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On May 11, 2010, the Consumer and Governmental Affairs Bureau (“the Bureau”) of the FCC released a public notice¹ seeking comment on the feasibility of instituting usage alerts and cut-off mechanisms that would provide wireless voice, text, and data consumers in the United States a way to monitor, on a real-time basis, their usage of a wireless communications service, as well as the various charges they may incur in connection with such usage.² The notice also seeks to know what means wireless consumers have today to monitor their consumption of wireless services and to what extent consumers are aware of the consequences of exceeding their allocations of voice minutes, text message limits, or data usage.³

AT&T is pleased to have this opportunity to describe the steps AT&T takes to ensure customers understand the usage-related terms of their service plans and that they have customer-friendly options available for monitoring and controlling their usage. From the information provided at the point of sale through the tools available to the wireless customer to check remaining message balances or data usage from the wireless device and up to and including courtesy usage

¹ DA 10-803 (Released May 11, 2010).

² *Id.* at 2. The other usage includes things like roaming, voice service minute plans, text message plans, and the like.

³ *Ibid.*

alerts for text and data users, AT&T offers its customers the information and the tools they need to control costs and avoid surprises.

Certainly, from AT&T's perspective, there is no need for the Commission to impose mandates like those adopted in the European Union ("EU"). AT&T already provides customers with more and better disclosures than the EU rules require, and the imposition of mandates is likely to restrict providers from adopting innovative new practices that customers may prefer.⁴ As the comments below will show, AT&T provides customers with ample opportunity to monitor and manage their usage of AT&T's wireless services. At the store, AT&T representatives go over a Customer Service Summary that explains the rate plan, terms of service and an itemized estimate of the first bill before any customer commits to a service contract. Customers can monitor their voice and data usage 24 hours a day seven days a week by entering a few numbers on their wireless device to see how many minutes and megabytes they have used. All AT&T customers can also manage their accounts online. In addition, AT&T provides alerts to let customers know when they approach or exceed their allotted text and data usage. For example, customers on AT&T's smartphone data plans receive courtesy alerts when they reach 65% and 90% of their data plan's limit. On certain plans, if the customer exceeds his usage limit by a specified amount without having responded to the alerts, AT&T will suspend the service until the subscriber calls customer service to restore it. In short, AT&T works hard to ensure that no customer need be surprised by his wireless bill.

⁴ The issue that EU regulators sought to address there, the shockingly high cost of intra-EU roaming, is not an issue in the much more competitive US market. The EU regulations were designed to ensure that EU subscribers, traveling within the EU, would be informed about the costly roaming charges that might apply within the EU, and get further disclosures when they reached certain data usage thresholds. Of course, in the US, providers typically offer roaming and long distance within the US at no additional charge.

**I. AT&T PROVIDES THE INFORMATION AND THE TOOLS CUSTOMERS NEED TO
MANAGE ACCOUNTS AND CONTROL COSTS.**

AT&T leads the industry in educating consumers about their new service. At AT&T stores, customers receive a personalized, easy-to-read Customer Service Summary (“CSS”) to ensure, before they sign up for service, that they fully understand any usage limitations and costs that may apply. Each potential customer’s CSS explains the features of the rate plan he has selected and the other terms of service. The CSS also includes a sample detailed, itemized estimated first bill as well as a sample subsequent bill to ensure that each potential customer knows what to expect.⁵ AT&T representatives review the CSS with each potential customer before the customer signs up for service.

Of course, AT&T recognizes that not all customers want to use the services the same way. Some may use more voice, others are heavy texters and more and more customers enjoy using broadband data service to surf the web, email, or stream video. Accordingly, AT&T offers customers a wide range of service plans so that customers can choose the plan that best addresses their needs and their budget. A growing percentage of customers choose prepaid calling plans, which are the most direct and simple way for customers to control their wireless bill. Other customers may choose among a variety of postpaid individual and family plans to meet their needs. AT&T’s nationwide plans offer voice plans with different sized “buckets” of minutes per month, including an unlimited calling option. In addition, a number of calling features are available to consumers, including free mobile-to-mobile calling to other AT&T wireless customers; RollOver, which allows customers to carryover any unused minutes to the next month; A-List calling, which permits unlimited calling to and from an AT&T mobility customer’s favorite U.S. phone

⁵ An example of a CSS is attached as Attachment 1.

numbers at no extra charge;⁶ and unlimited Nights & Weekend calling, which is offered on most plans.

Similarly, AT&T offers text and data users a wide variety of plans to meet their needs.⁷ AT&T offers several messaging options for qualified customers that result in a customer never having to worry about incurring overage charges for texting or MMS.⁸ AT&T also offers data plans with generous “buckets” of data usage at very competitive price points. For smartphone customers, AT&T’s new DataPlus plan offers 200 MB for \$15 a month.⁹ DataPlus appeals to people who primarily surf the web, send email, and use social networking applications. If a customer uses more than 200 MB in the course of a month, he will receive an additional 200 MB of data usage for \$15, replenished as often as necessary during the billing cycle for the same price. For those customers who regularly download or stream music and video, or use other high bandwidth applications, AT&T offers DataPro, which provides 2 GB of data for \$25 a month.¹⁰ As with DataPlus, a DataPro customer who exceeds 2 GB in the course of a month will automatically receive an additional 1 GB of data for \$10. Each time an additional 1 GB of data is used up during the cycle, AT&T replenishes the customer’s account with an addition 1 GB at the same price of \$10.¹¹

⁶ A-List t allows unlimited calling to a set list of domestic telephone numbers, on any network including landlines, without using minutes from the AT&T mobility customer’s plan.

⁷ AT&T also provides an online data calculator that enables customers to estimate their mobile data usage and get a better sense of which data plan is best for them. The calculator is found at www.att.com/datacalculator.

⁸ Examples include:

- Messaging Unlimited – provides unlimited text, picture, video, and instant messaging for an individual line.
- Messaging Unlimited for Families – provides unlimited text, picture, video, and instant messages for all users on a FamilyTalk account.
- Data Unlimited – provides unlimited access to the mobile internet, search, e-mail, music, and apps. (This service is available to quick message devices and basic phones only).

⁹ On average, 65% of AT&T smartphone customers use less than 200 MB a month.

¹⁰ On average, 98% of AT&T smartphone customers use less than 2 GB of data in a month.

¹¹ For users of quick messaging devices or feature phones, the Data Unlimited option is available. Additionally, virtually all AT&T smartphones come with Wi-Fi technology embedded in them. Wi-Fi generally provides consistently fast speeds and can be used at home, at the office, or elsewhere when available without counting against a

While prepaid plans and unlimited voice and messaging options provide customers with means to control costs, they are not the only tools AT&T offers. AT&T also enables parents to set limits on their children's wireless usage. Depending upon the level of control needed, AT&T offers parents two solutions. AT&T Smart Limits for Wireless is an online service that enables parent to provide their children with the freedom and security of a cell phone while setting sensible boundaries for its use. With AT&T's Smart Limits for Wireless, parents can, for a monthly fee, set limits online to

- Establish times of day their child's phone can be used for mobile Web browsing, messaging and outbound calls.
- Filter access to Internet content that is inappropriate for children.
- Define the number of text and instant messages allowed.
- Determine the amount of Web browsing usage allowed per billing cycle.
- Block or allow calls or texts to and from certain numbers (incoming and outgoing).
- Limit downloadable purchases such as ringtones, games, graphics and other content.

AT&T's MEdia Net Parental Controls offers parents basic controls for their child's cell phone use. With this tool, which is included at no charge with AT&T wireless service, parents can limit the types of content their child can view and restrict the purchase of premium content or subscriptions. Customers can activate this control free of charge on the device or by calling an AT&T customer care representative.¹²

AT&T offers a number of free services to assist customers in keeping track of their usage and their billing. Many of these services are accessible from the wireless phone or device itself and let the customer know remaining minutes, data usage, account balance, upgrade eligibility

customer's monthly data usage total. AT&T offers unlimited access to more than 20,000 AT&T Hotspots at no additional charge to smartphone and iPad customers with qualifying data plans.

¹² A compatible handset is required and small fees may apply for brief data usage if MEdia Net Parental Controls are set directly from the handset..

and more 24 hours a day, seven days a week.¹³ For example, by dialing *BAL# (*225#), a customer's account balance is delivered by text message as well as the next bill payment date and the last payment posted for the account. Similarly, by dialing *MIN# (*646#), the remaining minutes of the customer's "bucket" plan are delivered by text message. To check for data usage, a customer can dial *DATA# (*3282#) and a text message will report a breakdown of the subscriber's data usage.¹⁴ Customers can find more information about these self-service features by going to www.att.com/starservices.

AT&T customers can manage their accounts online through myWireless, AT&T's online account management system.¹⁵ By logging into the account, a customer can at any time view usage of voice, text and data services, review and pay the wireless bill, check rate plans, upgrade features, and more. With this free service, customers can know where they stand on all usage and how many days are left in the current billing cycle.¹⁶ Customers who have compatible smartphones can use the free AT&T myWireless application to check data usage from their smartphone. The free application is available for download in several smartphone app stores. Customers can also go online to www.att.com/wireless to see all of their usage.

One particularly useful feature offered through myWireless is the customer's ability to make retroactive changes to his service plan. For example, if a customer discovers that he has exceeded his monthly allowance in voice minutes, text messages or data, he can go online¹⁷ and

¹³ Customers must have a device capable of sending and receiving text messages. AT&T's *Services feature is not available to some former customers of acquired companies.

¹⁴ See, Attachments 2 through 4.

¹⁵ AT&T provides the majority of its smartphone users (this includes all iPhone, all Blackberry Curve and Bold, and all Android users) with a free "MyWireless app" that, when pressed, allows customers to quickly access their accounts. By saving log-in information, a customer never needs to enter it again and can then simply tap on the usage icon to see current usage details. Thus, with only 2 taps on these smartphones, customer gets all of the information regarding usage. AT&T plans to extend this capability to all smartphones by the end of 2010.

¹⁶ Naturally, customers may always call customer service for help or information. However, these online services, which provide key account information, are more convenient and more rapid.

¹⁷ Or call customer service.

change his plan to one with a higher allotment. This change will be retroactive to the beginning of the current bill cycle, thereby sparing the customer any overage charges.

On June 7, 2010, AT&T introduced new, less expensive data plans for smartphone users.¹⁸ These plans, DataPlus and DataPro, offer convenient allotments of data usage designed to meet the requirements of AT&T's mobile data customers at affordable prices. To help these customers keep abreast of their data usage, AT&T provides courtesy alerts¹⁹ when a DataPlus or DataPro customer reaches 65% and 90% of his allotment. These alerts not only inform the customer of where he is the use of his monthly data allotment, they also give the customer the ability to control how much data usage he wants to use in a billing cycle.

In a like manner, free, courtesy alerts go out to customers who subscribe to a messaging plan but exceed the limits of their monthly text, picture, video, or instant messaging allotment programs by \$10 to \$15. If the customer fails to respond to the alert, subsequent alerts are sent to the customer once he reaches \$50, \$100, and \$200 in overage charges.²⁰ AT&T will temporarily suspend the customer's messaging service (but not the voice service) if the customer continues messaging without contacting customer service. Similarly, AT&T will send alerts to customers who subscribe to legacy data plans with monthly allotments if they exceed their usage plan by \$15. Should the customer fail to respond to the alert, AT&T sends subsequent alerts to the customer once he reaches \$50 and \$100 in overage charges. In an effort to assist pay-per-use customers, AT&T provides these customers with courtesy notices about their usage. For a customer whose pay-per-use Internet-related data charges exceed \$15 during the current billing

¹⁸ See, p. 4 above for a description of the new data plans.

¹⁹ Ninety-nine per cent of these alerts reach customers within 24 hours of a particular limit having been triggered.

²⁰ For laptop or notebook data customers with a 5 GB limit, AT&T sends alerts to the customer when they have reached 65% and 95% of that limit, and AT&T temporarily suspends their data service when they hit 100% of their 5 GB allotment. Once the customer calls customer service and is informed of the overage, service may be reinstated at the customer's request. Smartphone customers on DataPlus or DataPro who choose to exceed their monthly allotment receive automatic additional allotments as described earlier. See, p. 4.

cycle, AT&T sends the subscriber a free incoming text message alerting the customer to the usage and advising the customer to call AT&T.²¹ A similar alert goes out to customers whose pay-per-use charges for text, picture, video, or instant message usage in the current billing cycle exceed the cost of an unlimited messaging plan.²²

II. ROAMING

Unlike the difficulties encountered by European Union wireless customers roaming outside of their home countries, roaming – in particular, voice roaming – presents far fewer problems to the American wireless customer. As noted earlier, all AT&T voice plans within the United States include domestic coverage of the fifty states, Puerto Rico and the U. S. Virgin Islands. Long distance is also included in all voice plans. In short, there is no domestic “roaming” for AT&T’s U. S. customers. Consequently, customers need only keep track of the minutes remaining in their plans and need not worry about roaming or long distance charges. Text messages and data usage while roaming within the United States are also charged against the customer’s AT&T plan, and AT&T will send alerts as described above.

For customers going abroad, AT&T provides a number of different resources at www.att.com/global to help them plan how to use their wireless devices while travelling internationally.²³ This site includes information on how to get the best international voice and data rates based upon planned destinations, and offers tips and tutorials for customers going abroad. The information provided includes

- Know Before You Go: www.wireless.att.com/learn/international/roaming/know-before-you-go.jsp

²¹ The message says: “AT&T FREE MSG: ALERT! You have exceeded \$15 in data/Mobile Web charges this month. Call 1-800-894-8963 to discuss your options.” If the customer’s email address is on file, AT&T also sends an email to the customer alerting him of the overage.

²² “AT&T FREE MSG: ALERT! You have exceeded \$20 in text messaging charges this month. Call 1-800-894-8963 to discuss your options.” If the customer’s email address is on file, AT&T also sends an email to the customer alerting him of the overage.

²³ See, Attachments 5 through 10.

- Verify Rates: www.wireless.att.com/learn/international/roaming/international-roaming.jsp
- Travel Guide: www.wireless.att.com/learn/international/roaming/travel-guide.jsp
- FAQ on International Roaming:
www.wireless.att.com/learn/international/roaming/faq.jsp

Customers also have the option to call customer service at any time to have international roaming blocked. To help customers track and manage data usage overseas, iPhone users can use the device's Usage Tracker option. Laptop users can view data usage in the Communications Manager window on their screen. As with domestic service, AT&T customers will receive data usage alerts while abroad.

III. ACCESSIBILITY

Because the usage alerts are sent by a free, text message, customers with hearing disabilities are able to read these messages and take the appropriate action needed to manage their accounts. Customers whose eyesight is impaired have access to the text messages by means of software such as mobile speak, mobile magnifier or voice over for iPhone users.

CONCLUSION

AT&T is grateful for the opportunity to highlight the many ways it helps its customers manage their costs. By providing reasonable prices, a CSS with fulsome explanations of what to expect, tools to monitor and control usage (like the *data# service and SmartLimits services, on-line account management that will even allow customers to adjust rate plans retroactively, and alerts to warn customers when they are using up the data in their plans), AT&T offers the information and the tools customers need to avoid surprises. Moreover, unlike European wireless customers, who may pay high roaming charges to roam within the EU, AT&T customers on Nation plans enjoy roaming and long distance serviced within the United States at no additional

cost. Moreover, AT&T already provides alerts to let data customers know when they are nearing the amounts allotted in their plans. Thus, European-style regulation is unnecessary.

AT&T's provision of alerts and cut-offs for data and text go far beyond what the European Union regulations would require (if the Commission were to imitate the EU regulators). The European Union regulations apply only to intra-EU roaming and require usage alerts for data roaming services only. AT&T provides alerts and cut-offs for data and messaging no matter where the customer is located within the country. AT&T developed these tools to provide the best customer experience in the world's most highly competitive wireless marketplace. To replace such competition-driven, innovative consumer benefits with a one-size fits all European regulations would not benefit consumers. The US wireless industry is an incredible success story, with competition breeding innovation and consumer benefits in the form of more robust networks, better devices, more applications, lower prices and higher usage than wireless customers enjoy anywhere else in the world. To the extent that the Commission adopts a static rule "defining" part of the customer experience, it will serve as an obstacle to attempts to improve it.

July 06, 2010

Respectfully submitted,

/s/William Roughton

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Its Attorneys

Attachment 1



Customer Service Summary

JOHN SMITH

My Service	
Wireless Number:	123-456-7890
Rate Plan:	NATION FAMILYTALK 700
Rate Plan Charge*:	\$9.99
Term of Service:	24 months
Anytime/Daytime Minutes:	700 (shared)
Night/Weekend Minutes:	Unlimited (shared)
Mobile to Mobile Minutes:	Unlimited (shared) in US
Upgrade/One Time Fee:	\$18.00

*Additional charges or credits may apply. See page 2 for details.

My Plan Details	
DATAPLUS 200MB FOR iPhone WITH VISUAL VOICEMAIL	\$15.00
<ul style="list-style-type: none"> • Eligible voice & data plan for iPhone required. • 200MB of data (US Only). \$15/200MB of add'l data. • Unlimited AT&T Wi-Fi Basic Hotspot usage. • Visual Voice Mail 	
ROLLOVER MINUTES	Included
<ul style="list-style-type: none"> • Unused, accumulated Anytime Minutes that carry over from month to month. • Start accumulating after your first full billing period; expire after 12 rolling bill periods. • Oldest Rollover Minutes are used first. Not transferable or redeemable for cash or credit. • If you change rate plans, any accumulated Rollover Minutes in excess of the new plan's number of monthly anytime minutes will expire upon such change. 	
MOBILE TO MOBILE MINUTES	Included
<ul style="list-style-type: none"> • Calls made to and from other AT&T customers in your mobile to mobile calling area do not count against Anytime Minutes. Minutes do not rollover (exceptions may apply) • Mobile to Mobile minutes only apply in the US 	
OTHER FEATURES	Included
<ul style="list-style-type: none"> • To review additional features on your plan please visit att.com/wireless for details 	

Using My Phone	
Phone Model:	Apple iPhone
To learn more about using your iPhone, go to: www.apple.com/support/iphone .	

Using My Visual Voicemail	
Set Up Mailbox/Check Messages	
Tap on home screen. Tap Voicemail and follow the prompts.	
Check Messages From Another Phone	
<ol style="list-style-type: none"> 1. Dial your 10-digit wireless phone number. 2. When the greeting begins, PRESS * 3. Enter your password and follow the prompts. 	
Forgot Your Password?	
Dial 611 and follow the prompts to reset.	
To learn more about Visual Voicemail features and security, go to: att.com/WirelessHelp . Customers with an existing voicemail account should review current messages before setting up Visual Voicemail. Existing messages will be deleted once your Visual Voicemail account has been established.	

* Services	
Check usage or balance via a FREE text message.	
DIAL: *MIN#	Send (*646#)
DIAL: *BAL#	Send (*225#)
Check data usage via a FREE text message.	
DIAL: *DATA#	Send (*3282#)
Check phone upgrade discount availability.	
DIAL: *NEW#	Send (*639#)
FREE instant access to our automated bill pay system.	
DIAL: *PAY	Send (*729)
See att.com/StarServices for limits regarding *MIN#/*DATA#.	
TXT-2-PAY: A monthly text message reminder of your bill — and you can pay just by replying.	

Contact Us	
Web:	att.com/wireless
Wireless Phone:	611
Landline:	1-800-331-0500
Store Phone:	608-829-4980
Store Manager:	DANA VIGNA

Generated on: 06/21/2010

Manage your account online! View your current balance, detail billing records, pay your bill and access this document by registering for online account management at: att.com/Mywireless.

ui2

Understanding My Next Bill

Your next bill may be higher than expected! The bill may include:

- Upgrade fee.
- Prorated charges and fees for the month when you made the change.
- One month's service billed in advance.

The sample bill is not part of your contract.

Start Of Billing Cycle: 13th of the month

Wireless Summary For:		123-456-7890		
JOHN SMITH				
Monthly Service Charges	Period	Prorated Charge	Monthly Charge	Total Charge
Rate Plan				
Previous Rate Plan				
NATION FAMILYTALK 700 (4-lines)	05/13-06/12	-58.00		-58.00
Current Rate Plan				
NATION FAMILYTALK 700 (4-lines)	05/13-07/12	9.99	89.97	99.96
Other Services				
DATAPLUS 200MB FOR iPhone WITH VISUAL VOICEMAIL	06/07-07/12	3.00	15.00	18.00
Total Monthly Service Charge				\$59.96
Usage, Additional Minutes, Roaming, Directory Assistance (411) and Long Distance Charges		BASED ON ACTUAL USAGE		
Credits, Adjustments & Other Charges*				
Upgrade/One Time Fee		18.00	18.00	
Activation Fee				
Regulatory Cost Recovery Charge		2.80	2.80	
Federal Universal Service Fund		3.36	3.36	
State Universal Service Fund		1.10	1.10	
Other AT&T Surcharges		7.68	7.68	
Total Credits, Adjustments & Other Charges				\$32.94
Government Fees & Taxes				
State and Local Tax				
911 Fee				
Total Government Fees & Taxes**				
Total Charges:		(ESTIMATED)		\$92.90

*AT&T imposes a Regulatory Cost Recovery Charge of up to a \$1.25 to help defray costs incurred in complying with State and Federal telecom regulation; State and Federal Universal Service charges and surcharges for government assessments on AT&T. These are not taxes or government required charges. ** The estimates above are based on the highest tax/fee/surcharge rates assessed in your state; actual charges may vary. For actual state percentages, visit att.com/AdditionalCharges. To prevent unauthorized charges, notify AT&T immediately if your phone is lost or stolen. Your rate plan brochure/contract controls if inconsistent with this document. ©2010 AT&T Intellectual Property. All rights reserved. AT&T, AT&T logo and all other marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies.

Standard Charges

Additional Minutes:	45¢/min.
411:	\$1.99/call + Airtime
Text/IM:	20¢ (25¢/50¢ IntL)/message*
Picture/Video:	30¢/message*
iPhone Data Plan:**	\$15.00 per month

*Charged for messages sent and received. Rates differ if text plan selected.

**Domestic US; International plans available.

Airtime Minutes apply to Visual Voicemail retrieved from mobile.

Roaming Charges

International roaming charges apply for any usage outside the continental U.S., Puerto Rico and U.S.V.I.

Our Policies

30-Day Equipment Return Policy

- Returns/exchanges must be like new and include all original packaging, accessories, manuals, and proof of purchase.
- No exchanges on Closeout items.
- iPhone returns subject to a 10% restocking fee except where prohibited.
- Authorized Retailer and Other Locations: See the specific location's return policy.

30-Day Service Cancellation Policy

- Payment required for services used.
- Activation fee will be refunded if termination occurs within 3 days of activation.
- See our complete policy at: att.com/ReturnPolicy.

Wireless Phone Insurance

Asurion offers MobileProtect™, Insurance for your iPhone®. See mymobileprotect.com for details.

iPhone Warranty and Repair

All iPhone warranty and repair is handled by Apple at www.apple.com/support or 1-800-MY-IPHONE or Apple Retail stores with an appointment. New iPhones have a one year hardware manufacturer's warranty. Refurbished iPhones may differ. Warranty replacement iPhones may be refurbished devices.

📄 Wireless Service Agreement	
Wireless Number: 123-456-7890	30-Day Cancellation Policy
Account Number: 111111111	I may terminate this Agreement within 30 days after activating service without paying an Early Termination Fee. I will pay all fees and charges incurred through the termination date, but AT&T will refund any activation fee if I terminate within three days of activation. Also, I may have to return any handsets and accessories purchased with this Agreement and pay any applicable restocking fees. If I terminate <u>after</u> the 30th day but before the Agreement's Service Commitment has expired, I will pay AT&T an Early Termination Fee for each wireless telephone number associated with the service.
<p>The Wireless Service Agreement consists of:</p> <ol style="list-style-type: none"> 1. The Terms of Service and its arbitration clause. 2. The rate plan terms including the Data Service Terms and Conditions and applicable feature terms. 3. Rates and other details about the rate plan (in Customer Service Summary, brochure or at att.com/wireless). 	<p>Mobile Content</p> <p>I understand that wireless devices can be used to purchase goods, content, and services (including subscription plans) like ring tones, graphics, games, and news alerts from AT&T or other companies. I understand that I am responsible for all authorized charges associated with such purchases from any device assigned to my account, that these charges will appear on my bill (including charges on behalf of other companies), and that such purchases can be restricted by using parental controls available from an AT&T salesperson, at att.com/wireless, or by calling AT&T.</p> <p>Optional Wireless Phone Insurance Is Available</p> <p>If not already enrolled, ask about optional Wireless Phone Insurance. If eligible, you have 30 days from the date of activation or upgrade to add it. Provided by Asurion Protection Services, underwritten by CNA. See brochure for complete terms and conditions. Key terms include:</p> <ul style="list-style-type: none"> • Premium: \$4.99/month • Non-refundable Deductible: from \$50-\$125/per claim. • Limits: Two claims per 12 months; maximum replacement value of \$1500/per claim. • Replacements may be refurbished or different model. • Cancel at any time for a prorated refund of the monthly charge. • iPhone is not eligible for insurance through AT&T but is available through Asurion at mymobileprotect.com. <p>I HAVE READ AND AGREE TO BE BOUND BY THIS AGREEMENT WITH ITS SEPARATE TERMS OF SERVICE, RATE PLAN AND FEATURES BROCHURES (including but not limited to, their Changes to Terms and Rates, Limitations of Liability, and Arbitration clauses). If buying an iPhone, I agree that using it acts as an acceptance of the Apple and third party terms and conditions included with the iPhone.</p>
<p>Early Termination Fee (ETF)</p> <p>If I terminate this Agreement before the end of my Commitment, I will pay an ETF of up to \$325 if purchasing certain specified Equipment (e.g., Smartphones) OR up to \$150 for other Equipment for each tel. no. associated with my service as indicated in the Terms of Service.</p> <p>Guaranty</p> <p>If I am signing on behalf of an entity, I represent that I am authorized to sign on its behalf, and I agree to be jointly responsible with the entity for payment of any sums that become due under, and to be bound by, this Agreement. I agree you can collect directly from me without first proceeding against the entity.</p> <p>Contract Provisions</p> <p>This Agreement incorporates and includes by reference AT&T's current Terms of Service #FMSTCT06100152E and its arbitration clause. This Agreement also incorporates and includes by reference the versions of the following AT&T brochures that are effective as of the date of this Agreement: i. AT&T's Rate Plan Brochure describing the services listed above under "Monthly Plan;" and, ii. AT&T's Features Brochure(s) describing the service feature(s) listed above under "Other Services." I acknowledge that the Terms of Service Booklet, the Rate Plan Brochure and the Features Brochure(s) were separately provided to me before the time I signed this Agreement.</p> <p>Service/Coverage Limitations</p> <p>Service is not available at all times in all places. There are gaps in coverage within the service areas shown on maps.</p> <p>iPhone and Certain Other Devices</p> <p>Eligible voice and data plans are required for iPhone and certain other devices. The data plans do not cover international data charges. I agree that AT&T may add required plans to my account and bill me the appropriate monthly fee if I use an iPhone or other device that has plan requirements.</p> <p>Optional Roadside Assistance is Available from AT&T</p> <p>Enroll for \$2.99/month and get the first 30 days free. After the free period the charge is \$2.99/month per line. You may cancel at any time by contacting AT&T.</p>	
<p>My Service Details</p> <p>Agreement Start Date: 06/21/10</p> <p>Deposit Amount: \$0</p> <p>Dealer/Sales Code: XXXXX</p> <p>IMEI: 01216400000000</p> <p>SIM: 89014103211000000000</p>	
<p>Signing My Agreement</p> <p>You will sign this agreement electronically.</p> <ol style="list-style-type: none"> 1. If you do not sign using a signature capture device, dial *862 from your phone or 1-866-895-1092. 2. Listen and follow the prompts. 3. Upon completion, your phone will be activated. <p>If electronic signature is not available, please sign below:</p> <p>Signature _____</p>	

Attachment 2



The image shows a screenshot of a mobile phone's text message inbox. The message header is "Inbox (1/4)". The message content includes: "Date: Sep 07, 02:00 pm", "Current Balance: \$3.44", "Due Date: 09/17/08", "Last payment Rcvd: \$3.44", "On: 08/07/08", and "From: 101". To the right of the text is a silver flip phone with its screen displaying "*BAL#". Below the phone screenshot is a white banner with the text "check your balance" in blue.

Inbox (1/4)

Date: Sep 07, 02:00 pm

Current Balance: \$3.44

Due Date: 09/17/08

Last payment Rcvd: \$3.44

On: 08/07/08

From: 101

***BAL#**

[check your balance](#)



The image shows a Motorola flip phone with a screen displaying the text *** MIN #**. To the left of the phone is a dark blue/black panel with white text. At the top of this panel is a back arrow icon and the text **Inbox (1/4)**. Below that is **Date: Sep 07, 02:30 pm**, followed by **MINs Remaining**, **As of: 09/07**, **Anytime: 867**, and **See att.com/starservices for applicable limitations.** At the bottom of the entire graphic is a white banner with the text **check your minutes** in a blue, lowercase font.

Attachment 4



The image shows a screenshot of a mobile phone's notification screen. On the left, a black box contains white text: "Inbox (1/4)", "Date: Sep 07, 02:10 pm", "Data Remaining", "As Of: 09/07", "TXT/IM: 199", "Pics/Videos: 200", "MEdia Net/Internet(MB): 5", and "See att.com/starservices for applicable limitations." On the right, a silver flip phone is shown with its screen displaying "*DATA#". Below the phone, a white banner contains the text "check your data usage" in blue.

Travel Guide - Wireless from AT&T - Microsoft Internet Explorer provided by AT&T

My Web Search | Google | Search | Address | http://www.wireless.att.com/learn/international/roaming/travel-guide.jsp | Sign in

at&t.com | Wireless Home | Personal | Business Center | About Us | My Account

Find a Store | Coverage Viewer | Españo | Cart | Search | Go

at&t

EXPLORE | **SHOP** | **SUPPORT** | myWireless Account | Log in | Sign up now

Why AT&T | Wireless Basics | Messaging & Internet | Ringtones & Apps | Music & Video | International | Resources

International Long Distance
GoPhone International
International Roaming
GoPhone International Roaming
Affordable World Packages
Travel Guide
iPhone Travel Tips

Travel Guide
Know before you go
Going on a trip? Chances are, AT&T has you covered—with roaming agreements in more than 220 countries worldwide.
Use our Wireless Travel Guide to find out if your device works where you need it, and with the features you expect like data and text messaging. Plus, look up international rates and coverage information. Just select up to ten destinations, add them to an itinerary, and then print carrier and rate information to take with you.
Use the Travel Guide
Data Service Terms and Conditions

Quick Links
Find what you're looking for, Fast.
Apps | Shop now

Travel Guide Video
Watch and learn how to travel internationally with your wireless device.
Watch & learn

Wireless Service Agreement | Cell Phone Records Security

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Loca Intranet

http://www.wireless.att.com/travelguide/coverage/roaming/step1.jsp?CIDL=71...

at&t

CRUISE SHIPS | SHOW ALL DESTINATIONS

1. Build Itinerary 2. Select Wireless Device 3. View Summary

Destination Selection

Africa **Asia** **Central/South America** **Europe** **Middle East** **North America & Caribbean** **Australia & Oceania**

Afghanistan, Alda Cruises, Alder Islands, Albania, Algeria, Almerie Ferries, American Samoa, Andorra, Angola, Anquilla, Antigua and Barbuda, Argentina, Armenia, Aruba, Ascension Island, Australia, Austria, Dominican Republic, East Timor (Timor), Easter Island, Ecuador, Egypt, El Salvador, England (U.K.), Equatorial Guinea, Eritrea, Estonia, Ethiopia, Falkland Islands, Faroe Islands, Fiji, Finland, Fr. Polynesia(Tahiti), France, Liberia, Libya, Liechtenstein, Lithuania, Louis Cruise Line, Luxembourg, Macao (Macau), Macedonia, Madagascar, Malawi, Malaysia, Maldives, Mali, Malta, Marshall Islands, Mauritania, St. Helena, Saudi Arabia, Scotland (U.K.), Senegal, Serbia, Seychelles, Sierra Leone, Silversea Cruises, Singapore, Slovakia, Slovenia, Solomon Islands, Somalia, South Africa, Spain, Sri Lanka, St. Barthelemy, St. Helena

Itinerary

01. South Africa
 02. Hong Kong
 03. Belize
 04. Greece
 05. Israel
 06. Jamaica
 07. Mexico
 08. Fiji
 09. France
 10. Italy

Clear All **Continue**

Welcome to the AT&T Travel Guide. Look up international rates, wireless devices, and carrier information. Click up to ten destinations and add them to the itinerary on the right. Click Continue to select a wireless device.

The screenshot shows a web browser window with the address bar containing the URL: <http://www.wireless.att.com/travelguide/coverage/roaming/step2.jsp?CIDL=71...>

The page features the AT&T logo in the top left corner. A breadcrumb trail at the top reads: **1. Build Itinerary** | **2. Select Wireless Device** | **3. View Summary**. Below this, a progress indicator shows three steps, with the second step, "Select Wireless Device", being the active one.

The main content area is titled "Wireless Device Profile" and contains the following elements:

- A search prompt: "enter mobile number:" followed by three input fields (for area code, prefix, and number) and a blue plus sign button.
- The word "OR" centered below the search fields.
- A second search prompt: "view devices currently available for sale" followed by a blue plus sign button.
- A "Your Device" section on the right, which includes a placeholder image of a mobile phone and the text "MANUFACTURER/MODEL NETWORK".
- At the bottom right, there are two buttons: "Back" and "Continue".

A footer note at the bottom of the page reads: "Enter your ten-digit mobile number and click Continue to view your wireless device profile. Or click 'view devices currently available for sale' to shop for compatible devices."

http://www.wireless.att.com/travelguide/coverage/roaming/step3.jsp?CIDL=71...

at&t

1. Build Itinerary 2. Select Wireless Device 3. View Summary

Your Device



MANUFACTURER/MODEL
BlackBerry/Bold 9700

NETWORK
GSM/GPRS/EDGE
850/900/1800/1900;UMTS/HSDPA
850/1900/2100

Wireless Device Profile

My mobile number is [] EDIT

Your wireless device is the BlackBerry/Bold 9700

<input checked="" type="checkbox"/> AT&T	<input checked="" type="checkbox"/> Garmin	<input checked="" type="checkbox"/> Option
<input checked="" type="checkbox"/> Acer	<input checked="" type="checkbox"/> HP	<input checked="" type="checkbox"/> PalmOne
<input checked="" type="checkbox"/> Apple	<input checked="" type="checkbox"/> HTC	<input checked="" type="checkbox"/> Pantech
<input checked="" type="checkbox"/> Audiovox	<input checked="" type="checkbox"/> LG	<input checked="" type="checkbox"/> Samsung
<input checked="" type="checkbox"/> BlackBerry	<input checked="" type="checkbox"/> Lenovo	<input checked="" type="checkbox"/> Siemens
<input checked="" type="checkbox"/> Cingular	<input checked="" type="checkbox"/> Motorola	<input checked="" type="checkbox"/> Sierra Wireless
<input checked="" type="checkbox"/> Dell	<input checked="" type="checkbox"/> Nokia	<input checked="" type="checkbox"/> Sony Ericsson
<input checked="" type="checkbox"/> Firefly	<input checked="" type="checkbox"/> Novatel	

Click the manufacturer of your wireless device. To go back to the beginning of the wireless device profile page, click the edit button above.

Back Continue

http://www.wireless.att.com/travelguide/coverage/roaming/step4.jsp?CIDL=71...

1. Build Itinerary 2. Select Wireless Device 3. View Summary

at&t

Wireless Devices

YOUR DEVICE
BlackBerry/Dalid 9700



EDIT NETWORK

COMPARISON DEVICE
Apple/iPhone 3G S



EDIT NETWORK

Summary

	YOUR DEVICE		COMPARISON DEVICE		RATES & COVERAGE
	VOICE / DATA	VOICE / DATA	VOICE / DATA	VOICE / DATA	
01. Belize	Y	Y	Y	Y	DETAILS
02. Fiji	Y	Y	Y	Y	DETAILS
03. France	Y	Y	Y	Y	DETAILS
04. Greece	Y	Y	Y	Y	DETAILS
05. Hong Kong	Y	Y	Y	Y	DETAILS
06. Israel	Y	Y	Y	Y	DETAILS
07. Italy	Y	Y	Y	Y	DETAILS
08. Jamaica	Y	Y	Y	Y	DETAILS
09. Mexico	Y	Y	Y	Y	DETAILS
10. South Africa	Y	Y	Y	Y	DETAILS

EDIT ITINERARY PRINT SUMMARY VIEW ALL

If your device is compatible with the destinations shown above, call 1-800-331-0500 to add international roaming. Restrictions may apply. If your device is not compatible, visit our [online store](#) or a AT&T retail store.

Back Start Over

AT&T - Microsoft Internet Explorer provided by AT&T

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites

Address: http://www.wireless.att.com/traveguide/coverage/coverage_details.jsp?CIDL=250&M

Search AutoFill Translate Share Sidewiki Sign In

at&t

destination details

France

INTERNATIONAL WIRELESS CARRIERS, COVERAGE, AND SERVICE															
Network Carrier	Coverage	Available Services	Technology & Frequency												
BOUYGUES TELECOM	1800 nationwide coverage, main cities on 900. GPRS on 1800 only. GSM/GPRS Coverage Map UMTS coverage in Paris and surrounding area, and in Lyon and Grenoble	<ul style="list-style-type: none"> Voice Data EDGE 2-way text messaging 	UMTS 2:00; GSM/GPRS 1800												
Drang	GSM/GPRS 1800 MHz coverage is in main cities & major highways; 900 MHz coverage is nationwide. GSM/GPRS Coverage Map UMTS coverage may be limited to major population areas.	<ul style="list-style-type: none"> Voice Data EDGE 2-way text messaging 	UMTS 2:00; GSM/GPRS 900/1800												
SFR	GSM/GPRS 1800 MHz coverage is in main cities & major highways; 900 MHz coverage is nationwide. GSM/GPRS Coverage Map UMTS coverage may be limited to major population areas in France. UMTS/GS Coverage Map	<ul style="list-style-type: none"> Voice Data EDGE 2-way text messaging 	UMTS 2:00; GSM/GPRS 900/1800												
<p>INTERNATIONAL WIRELESS ROAMING PER MINUTE RATES</p> <p>Roaming: Calls Placed/Received While in France</p> <table border="1"> <tr> <td>AT&T Standard International Roaming</td> <td>\$1.29</td> </tr> <tr> <td>AT&T World Traveller</td> <td>\$0.99</td> </tr> <tr> <td>AT&T Canada</td> <td>\$1.29</td> </tr> <tr> <td>AT&T Mexico</td> <td>\$1.29</td> </tr> </table> <p>Data Usage: All GPRS pay per use rates are \$ 0195/<B, except in Canada rate is \$.015/K<B</p> <p>Text, Picture and Video Messages:</p> <table border="1"> <tr> <td>Send Text Message</td> <td>\$0.50 per message sent</td> </tr> <tr> <td>Send Picture and Video Messages</td> <td>\$1.30 per message sent</td> </tr> </table> <p>Home day-per-use or package rates apply to all text, picture or video messages received when roaming internationally. Please visit www.att.com for details.</p>				AT&T Standard International Roaming	\$1.29	AT&T World Traveller	\$0.99	AT&T Canada	\$1.29	AT&T Mexico	\$1.29	Send Text Message	\$0.50 per message sent	Send Picture and Video Messages	\$1.30 per message sent
AT&T Standard International Roaming	\$1.29														
AT&T World Traveller	\$0.99														
AT&T Canada	\$1.29														
AT&T Mexico	\$1.29														
Send Text Message	\$0.50 per message sent														
Send Picture and Video Messages	\$1.30 per message sent														

You may not be able to place calls to international destinations other than the United States while roaming in this destination. Calls can be completed within the visited destination and back to the United States.

Local intranet