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Director

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April 18, 2011

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CG Docket 09-158, Consumer Information and Disclosure
CG Docket 10-207, Empowering Consumers to Avoid Bill Shock

Dear Ms. Dortch:

At the request of staff, Toni Acton, Celia Nogales, Davida Grant, Kimberly Darrin, Mark Kerber, Kent Wardin, Stacey Maris, Steve Montgomery, Andy Wilkinson and Doug Tribble representing AT&T had a conference call with Colleen Heitkamp of the Consumer and Governmental Affairs Bureau and John Adams of the Wireline Competition Bureau on April 14, 2011.

During the call, AT&T responded to a number of additional questions relating to AT&T's practices and procedures pertaining to third party billing. We explained that AT&T Mobility's customer care representatives do not distinguish whether a customer is calling to simply ask questions about a third party purchase versus complaining that a purchase was unauthorized and, therefore, do not track customer complaints of unauthorized purchases at this level. AT&T Mobility's general practice is to refund customers for third party billing purchases upon request, regardless of the reason behind the request. We advise customers that request a refund for third party content charges that their account will be credited for that purchase in the next billing cycle.

AT&T handles subscription cancellations and issues credits for disputed charges on the customer's behalf. AT&T advises customers on their bill of the ability to obtain help and manage their purchases online or by calling customer service. In addition, we include information on our website for customers who believe they may have been billed in error for a purchase on their mobile device at att.com/wireless and how they can challenge a charge.

We monitor the refund rates for third party billings by reviewing monthly revenue and refund reports by program or storefront providers to determine whether there is any indication that our customers may have been subjected to unauthorized charges. Additionally, our mobile commerce team works closely with our customer care team to monitor escalations by providing a feedback tool for our customer care reps to report issues regarding particular programs or providers. If a program or storefront provider reaches our established refund rate limit, or should we determine a trend in customer escalations regarding a particular program, we promptly escalate the issue and initiate an investigation, including investigating any specific complaints or the circumstances

around the rise in refunds. The results of such an investigation could include suspension or termination of our billing relationship with the provider.

With respect to AT&T's wireline products that have an ETF, we advised that our broadband products are the only wireline products that have an ETF, which is associated with a promotional price and a one-year contract. The ETF is normally $150, and is prorated over the 12-month period @ $12.50 per month. At the point of sale, we advise the customer of the ETF and that the standard rate will take effect at the end of the promotional period; the ETF is not reflected on the monthly bill.

In response to a question about FCC contact information, the only bills that include a contact number for the FCC are the bills for our California wireline customers.

If you have any questions, please contact the undersigned.

Sincerely,

/s/ Toni R. Acton

Toni R. Acton
Director

cc: Colleen Heitkamp
John Adams

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