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April 29, 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&T is providing the following information in response to questions that were asked by staff at our meeting on March 30, 2011.

- 1. Please provide the total number of overage fees incurred by AT&T customers on a monthly or annual basis, over the last few years.**

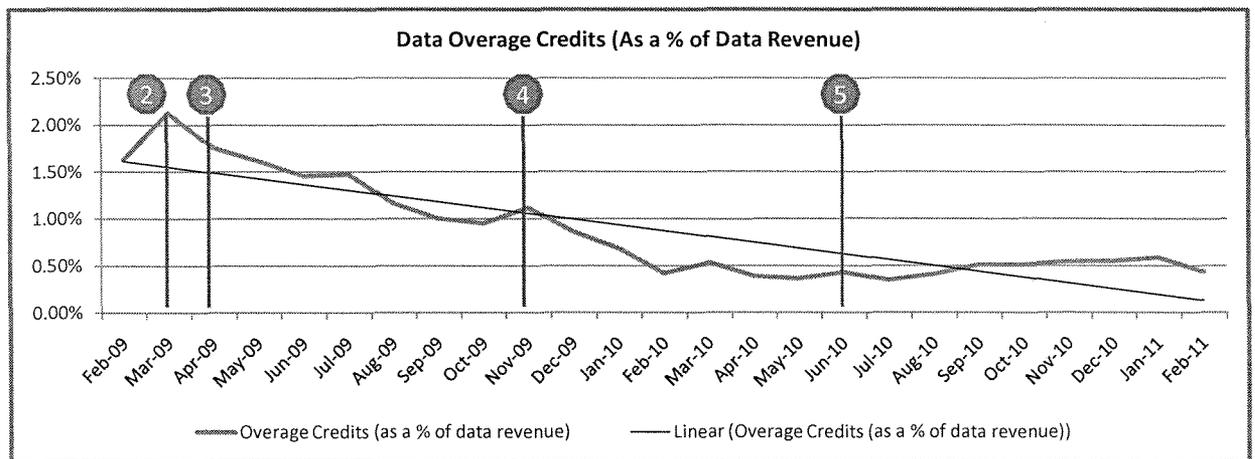
The following two charts display domestic data and messaging credits as a percentage of their respective revenues. In both instances, the trend in credits is down, even though both the number of subscribers and amount of usage have increased.



## Credit Adjustment Trending 2009 - 2011

### Data Plan Overage Credits – Major Treatment Milestones:

1. Initial **text only** notifications launched for a limited number of data plan customers - 4Q08
2. Notification program expanded to include all data plans, including pay per use plans – 1Q09
3. E-mail notifications introduced in conjunction with text alerts – April 2009
4. Notification thresholds lowered for data MRC plans – November 2009
5. Tiered Data Pricing launched for smartphone devices (unlimited data plans retired) – June 2010



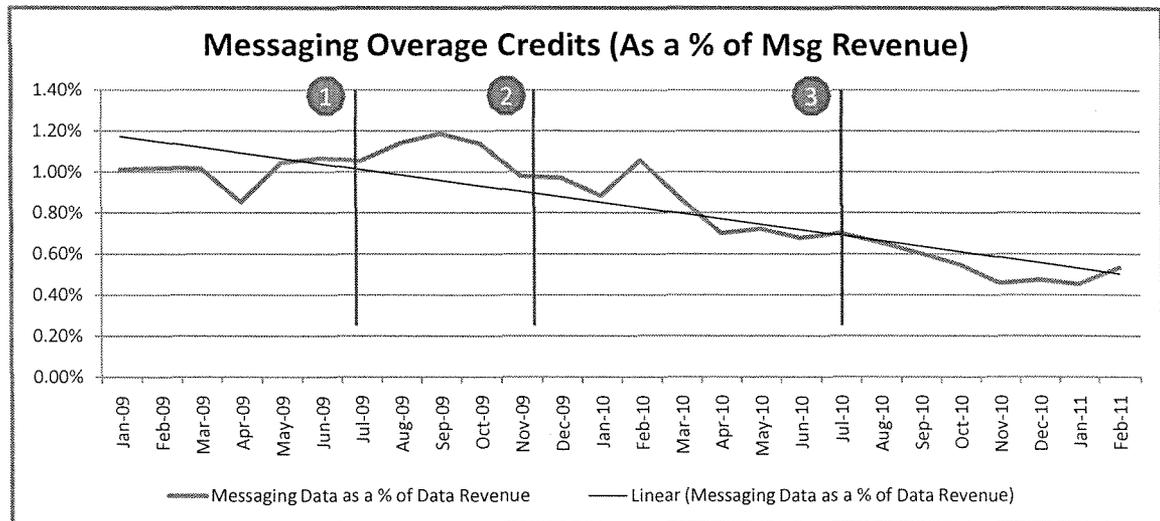
\*MRC Plan Overage Only



## Credit Adjustment Trending 2009 - 2011

### Messaging Plan Overage Credits – Major Treatment Milestones:

1. Initial notifications launched for pay per use SMS customers - July 2009
2. Notification program expanded to include all SMS only MRC plans – November 2009
3. Notification program expanded to include all **messaging** MRC plans – July 2010
  - Messaging plans include a single allowance for all messaging types – SMS, Picture, Video



\*MRC Plan Overage Only

2. It would be helpful to know: (1) in 2010, the number and percentage of AT&T mobile subscribers who made international calls from another country, sent international texts from another country, or accessed data from another country; and (2) of all AT&T mobile subscribers, who in 2010 made international calls from another country, sent international texts from another country, or accessed data from another country, the percentage who did so while on an AT&T international service plan.

This information is not readily available. As a matter of methodology, AT&T systems “count” unique mobile numbers billed for voice usage each month as well as unique mobile numbers billed for data usage each month. Customers who use both voice and data abroad are included in each bucket for a particular month. AT&T’s systems do not add the two lists together and filter out the duplicate mobile numbers, and it would be a significant undertaking to do so.

AT&T typically relies on clearinghouse “unique roamer” numbers for trending purposes; however, this data is somewhat overstated because the clearinghouse counts a mobile number as a “unique



roamer” by country. That is to say, anyone who takes a trip and visits more than one country and uses his phone in each, would be counted as a “unique” roamer for that month as many times as he has used his phone in a unique country. To illustrate, if you land in London, use your phone, change planes, arrive in France, and make a call there, you would be counted as 2 unique roamers, by the clearinghouse. Similarly, if you begin your trip at the end of the month, remain only in France, yet continue your trip (re-registering) into the next month, then you will be counted as two unique roamers, despite your having made but one trip abroad.

Customers who roam internationally have increasingly adopted discount packages for voice and data use while abroad. The “MRC” (monthly recurring charge) packages can be added to a customer’s account for the month he travels. There is no commitment term required for the package.

**DATA (package of MBs)**

	% PPU	% MRC
<b>2008</b>	60%	40%
<b>2009</b>	49%	51%
<b>2010</b>	48%	52%

- Regarding AT&T subscribers who travel near the United States borders with Canada and Mexico, and concerns about correctly identifying their communications traffic as domestic or international, it would be helpful to know: (1) in 2010 the number of AT&T mobile subscribers whose bill were adjusted to account for domestic voice, text, and data usage that "bled" over to a Canadian or Mexican cell tower (separate out numbers for voice, text, and data); and (2) the total amount of voice minutes, SMS texts, and of data usage so adjusted.**

In order to handle the “bleed-over” problem, AT&T re-rates to home *voice* (incoming and outgoing) or *data* usage on select Billing IDs (“BIDs”), which are typically cell towers within about 3 miles of the Canadian or Mexican borders. AT&T does not re-rate *messaging* to home, because mobile-terminated messages are always billed at domestic rates no matter where received. In addition, because a customer can look at his phone before sending a message and easily determine if he is attached to a foreign carrier, AT&T does not re-rate messages sent to home.

**Mexican and Canadian Voice Customers Whose Usage Was Re-Rated to “Home”**

From November 2010 through March 2011<sup>1</sup>, the average unique roamers, per month, per country who had CN/MX “bleedover” voice usage re-rated to “home” were:

- 69,213 customers per month with Canada bleedover usage
- 62,159 customers per month with Mexico bleedover usage
- 131,372 customers total



Rerating the voice usage of these customers represents about 25% of total actual voice usage in Canada and Mexico by AT&T customers.

#### **Mexican and Canadian Data Customers Whose Usage Was Re-Rated to “Home”**

From November 2010 through March 2011, the average unique roamers, per month, per country who had CN/MX “bleedover” data usage re-rated to “home” were:

- 75,161 customers per month with Canadian bleedover usage
- 58,719 customers per month with Mexican bleedover usage
- 133,880 customers total

Rerating the data usage of these customers represents about 12% of total actual data usage in Canada and Mexico by AT&T customers.

- 4. Please provide the number of customer complaints received about and credits issued for overages before and after implementing improved alerts. It would be helpful to know the number of such complaints and credits issued for a period of no less than a one year prior to and after such alerts. Please provide these numbers separately for overages related to voice, text, and data use**

AT&T does not track customer complaints for international or domestic charges and associated credits. We do, however, know that since implementing international data usage alerts, the customers most at risk of higher than expected data charges are pay-per-use international roamers with an iPhone or laptop device.

- Of the 39,746 international consumer/IRU roamers sent a usage alert (monthly average from August-October 2010), 81% went to pay-per-use customers, and only 19% went to customers with an international data package.
- Thus, on average, just .058% of our postpaid consumers/IRU customers had international data usage sufficient to trigger an alert, and only .01% of our postpaid consumers/IRU with an international data package incurred a data overage sufficient to trigger an alert.

If you have any additional questions, please contact the undersigned at 202-457-3039.

Sincerely,

Toni R. Acton

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<sup>i</sup> The average number of customers with voice or data usage re-rated to home from November through March would be lower than average across the entire year 2010 due to travel seasonality. When factoring in seasonality, estimate would be ~138K for voice and ~141K for data.