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Mary E. Burgess
General Attorney

Legal Department
111 Washington Avenue
Suite 706
Albany, New York 12210
Phone: (518) 463-3148
Fax: (518) 763-1477
mary.burgess@att.com

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Hon. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: L-2014-2411278 - Pennsylvania Public Utility Commission
Proposed Rulemaking – Paper Billing Fees**

Dear Secretary Chiavetta:

AT&T Corp. and Teleport Communications America, LLC (collectively “AT&T”) hereby submit their comments on the Pennsylvania Public Utility Commission’s proposed amendment to 52 Pa. Code, Section 53.85. The proposed amendment would prohibit the imposition of a supplemental fee, charge, or rate for furnishing a paper bill or invoice for services provided by a public utility. As explained below, **AT&T opposes the adoption of the proposed prohibition** because it would prevent companies like AT&T from responding to the demands of the market and encouraging customers to use electronic billing.

For many years, AT&T has offered its business and residential customers the option of paying their bills electronically because it provides them a convenient way to submit payments in

a timely and environmentally friendly manner. Doing so enables AT&T to avoid the administrative and economic costs associated with generating paper bills.

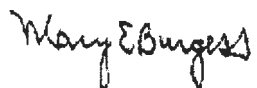
The benefits of paperless billing are undisputed. Using green-friendly e-bills is an effective way to help our customers reduce the demand for paper, save on postage, and to avoid the chore of paying bills by check. Paperless billing reduces pollution and the unnecessary use of resources associated with the paper billing process. AT&T's customers have responded positively to the availability of this convenient option, and use it to pay their utility bills in the same manner already used for various other bills issued by other industries.

The Commission should not unilaterally prohibit companies like AT&T from assessing a fee to cover the administrative costs and expenses triggered by generating paper bills. Since the benefits of paperless billing are so readily apparent and easily quantifiable, Commission intervention in this aspect of the relationship between the utility and its customers is simply not warranted. The proposed prohibition is also unnecessary because consumers have a broad array of suppliers from whom they can choose to take service. Consumer preference for electronic billing and/or payment, paper billing, or billing on recycled paper are all components of competitive choice which consumers can exercise.

AT&T further opposes the adoption of the proposed prohibition against paper billing charges because the rule would prevent companies from recovering the higher costs that are incurred as a result of generating paper bills. There is no legal authority to support the Commission's attempt to prevent carriers from assessing fees on those customers that cause the company to incur higher costs.

For the reasons explained herein, the Pennsylvania Public Utility Commission should not adopt the proposed amendment to 52 Pa. Code Section 53.85.

Respectfully submitted,

A handwritten signature in black ink that reads "Mary E. Burgess". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Mary E. Burgess