

# SNET America, Inc. DBA AT&T Long Distance East

## Company Name

(Provide the full name of the company as certificated or registered with the Missouri Public Service Commission. Do not abbreviate; include any Commission approved d/b/a or fictitious name, if applicable.)

## TELECOMMUNICATIONS COMPANY OR IVOLP PROVIDER ANNUAL REPORT TO THE MISSOURI PUBLIC SERVICE COMMISSION

**FILED**

MAY 31 2011

For the Calendar Year of  
January 1 - December 31, 2010

Missouri Public  
Service Commission

Please select how the company is certificated or registered with the Commission under the Company Name as shown above (check all that apply):

- ☐ Incumbent Local Telecommunications Company (not competitively classified ILEC)
- ☐ Incumbent Local Exchange Telecommunications Company (competitively classified ILEC)
- ☐ Competitive Local Exchange Telecommunications Company (CLEC)
- ☒ Interexchange Telecommunications Company (IXC)
- ☐ Local Non-switched Telecommunications Provider (classified in EFIS as IXC)
- ☐ Interconnected Voice over Internet Protocol Service Provider (IVoIP)

If more than one certificate or registration is held by the company then keep in mind that you must file an annual report in the Commission's Electronic Filing and Information System (EFIS) based on each certificate or registration. In such situations, we anticipate the annual reports to be identical; however please verify the following:

- ☐ The various annual reports filed in EFIS are identical.
- ☐ The various annual reports filed in EFIS are different.
- ☐ Not applicable (Company only has one certificate or registration; therefore only one annual report was filed in EFIS.)

Please choose one of the following filing options to indicate the security level of the filing:

- ☒ Public submission (NOT Proprietary or Highly Confidential)
- ☐ Non-Public submission (Highly Confidential or Proprietary)  
(See instructions for special requirements.)

Please review the instructions document before proceeding by using the link below:

[Instructions - 2010 Annual Report Telco and IVoIP](#)

**1. State in full the company's information below:**

<u>310 Orange Street</u>			<u>203-771-5911</u>
Company Street Address			Telephone Number
<u>6th Floor</u>			<u>203-865-2035</u>
Company Mailing Address			Fax Number
<u>New Haven</u>	<u>CT</u>	<u>06510</u>	<u>ap1498@att.com</u>
City	State	Zip	E-Mail Address

**2. This company is currently a (check appropriate box):**

☒ Corporation
 ☐ Sole Proprietorship
 ☐ LP  
☐ Partnership
 ☐ LLC
 ☐ Other - Explain

**3. Annual Report Contact Information:**

List the contact information of the person completing the form, whether an employee or a third-party preparer. This may differ from the address in Item No. 1.

<u>Arthur Paquette</u>			<u>203-771-5911</u>
Name			Telephone Number
<u>310 Orange Street</u>			<u>203-865-2035</u>
Street Address			Fax Number
<u>6th Floor</u>			<u>ap1498@att.com</u>
Mailing Address			E-mail Address
<u>New Haven</u>	<u>CT</u>	<u>06510</u>	
City	State	Zip	

**4. Identify the principal or general officers of the company at the end of the year.** Please include an additional sheet, if enough space is not provided on this page, to completely provide the requested information.

<u>Title of General Officer</u>	<u>Name of Person Holding Office</u>
<u>President</u>	<u>Richard Resnick</u>
<u>Assistant Secretary</u>	<u>Arthur Paquette</u>
<u>Secretary</u>	<u>Denise Iverson</u>
<u>Treasurer</u>	<u>Charles Allen</u>

**5. Please provide a list of all mergers, consolidations, and reorganizations involving the registered or certificated company and completed during the last year.** Do not include internal company reorganizations or personnel issues.

None



## 6. Please provide the following information concerning the company's revenues for this calendar year:

Row	Revenues:	MO Jurisdictional (Column A)	Total Company <sup>1</sup> (Column B)
<b>I. RETAIL</b>			
1.	<b>Local Service Revenues</b> include tariffed revenues attributed to local telecommunications services, extended area service, secondary features such as call forwarding, caller ID, local operator services, directory-related services, etc. and for IVoIP service.		
2.	<b>Interexchange Revenues</b> include revenues attributed to interexchange telecommunications services such as toll services, 800 services, interexchange operator services and interexchange IVoIP services.	\$26.00	\$81,400,000.00
3.	<b>Non-Switched Telecommunications Service Revenues</b> include revenues attributed to retail local and interexchange private line services (but not special access or private line services provided to other telecommunications carriers).		
4.	<b>Bundled or Packaged Revenues</b> include any revenues whereby the company is providing voice services in combination with multiple services whereby revenue can not be easily attributed to local, interexchange or non-switched categories. If such bundles includes Internet, video or some non-regulated service then the company's revenue shall be based on the company's rate offer for solely voice services. The excess revenue associated with the bundled service which is over the amount related to revenue associated with voice only service shall be recorded in the Total Company column. If voice service is only offered as part of a bundled service, the company shall identify all revenue associated with the bundle of services in the Missouri Jurisdictional column.		
5.	<b>Retail Uncollectible Revenues</b> from telecommunications revenues. (This amount is generally a negative number.)		
6.	<b>RETAIL TOTAL</b> (This amount should equal the total of Rows 1 - 5 above and should also match your Missouri Universal Service Fund Net Jurisdictional Revenue Report amount)	\$26.00	\$81,400,000.00
<b>II. OTHER</b>			
7.	<b>Wholesale Revenues</b> include intrastate switched, special access service revenues, carrier billing and collection revenues, and any other revenues derived from other telecommunications carriers.		
8.	<b>Miscellaneous Revenues<sup>2</sup> associated with non-retail services</b> , such as, advertising revenues, rent revenues, corporate operations revenues, special billing arrangements, customer operations, plant operations, other incidental regulated revenues, and other revenue settlements. ( <b>NOTE FOR ILEC ONLY:</b> refer to FCC account #s: 5230, 5240, 5250, 5261, 5262, 5263, 5264, 5269, and 5270.)		
9.	<b>Other Uncollectible Revenues</b> from other revenues. (This amount is generally a negative number.)		
10.	<b>High-Cost Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the High-Cost program.	N/A	
11.	<b>Other Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the following programs: Low Income, Schools and Libraries, and Rural Health.	N/A	
12.	<b>State USF Revenues</b> include all revenues received as support from the Universal Service Fund.		
13.	<b>TOTAL REVENUES</b> (This amount should equal the total of Rows 6 - 12 above.) Total MO Jurisdictional Revenue (Column A) should match Total Gross Intrastate Operating Revenue on the <b>Statement of Revenue</b> .	\$26.00	\$81,400,000.00

<sup>1</sup> "Telecommunications Service" as defined by Missouri Revised Statutes Section 386.020(54).

<sup>2</sup> "Interconnected Voice over Internet Protocol service" as defined by Section 386.020(23) RSMo.

<sup>1</sup> List total regulated revenue and IVoIP revenue provided by a registered company and, if applicable, non-regulated revenue for company name as listed at the top of this page. (This form may be submitted by an affiliate, but a separate form must be completed by each certificated or registered entity. Do not include revenues for any company NOT listed at the top of the page.)

<sup>2</sup> If you have miscellaneous revenue related to retail telecommunications services, then enter it in Row 1.

For use when filing under seal.

**Low Income and Disabled Universal Service Fund Subscriber Quantities**

7. Do you offer basic local telecommunications service or VoIP service as listed under 386.020 RSMo.?

☐ Yes

☒ No

If yes, please quantify the number of low income and disabled subscribers as reported to USAC (federal support, Form 497) and to the Missouri Universal Service Fund administrator for the past calendar year. (Insert "0"s if you do not have such subscribers.)

	**	Number of Missouri Low Income Subscribers	Number of Missouri Disabled Subscribers	**
January		0	0	
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December		0	0	
<b>TOTAL:</b>		0	0	



For use when filing under seal.



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<sup>1</sup> See instructions for additional clarification about filling out this page.

<sup>2</sup> **Exchange** refers to areas as listed in ILEC tariffs. (Exchanges are not always the same as rate centers, wire centers and central offices.)

<sup>3</sup> **Facility-based** refers to lines served whereby your company or an affiliate owns the switch and/or local loop. **Exchange** refers to areas as listed in Table 3. **Exchanges** are not always the same as rate centers, but

<sup>4</sup> **Resale/UNE** refers to lines served whereby your company leases all switch and loop facilities from a non-affiliated carrier either through an agreement or a discounted tariffed rate.

**Wholesale to Non-registered Nomadic VoIP Providers** refers to arrangements where your company is providing wholesale services for a nomadic VoIP provider who is not registered with the Missouri PSC. (Do not use this column for retail line quantities or if your company sets the end user's rates.)

Form Page 5

for the calendar year of January 1 - December 31, 2010**Relay Missouri Annual Billing, Collections and Retention**

9. Do you offer basic local telecommunications service or IVolP service as listed under 386.020 RSMo.?

☐ Yes☒ No

If yes, complete the following:

Month	Relay Missouri Revenue Collected (collected or received, according to your record-keeping methods)		Relay Missouri Retention Amount (of the amount collected)		Relay Missouri Revenue Remitted to Commission (of the amount collected)	
	**		**	**	**	**
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Total						

10. Please indicate the per line value of the Relay Missouri Surcharge you charge your customers each month.

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11. If your firm did not impose the Relay Missouri Surcharge, please explain:

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For use when filing under seal.

**Annual Customer Proprietary  
Network Information (CPNI)  
Compliance Certificate**

(A copy of a company's FCC CPNI filing will suffice for the required descriptions for all items, unless H.2 is chosen, then an additional description must be attached.)

12. The company affirms having established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160(7).

Indicate which of the following apply with Y (Yes) or N (No).

☐

A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Attached is a brief description of the company's system.

☐

B. The company has implemented personnel training as to when personnel are or are not authorized to use CPNI including an express disciplinary process. Attached is a brief description of the company's training and disciplinary process.

☐

C. The company maintains records for at least one year of sales and marketing campaigns of its own, its agents, affiliates, joint venture partners and any independent contractors, that use its customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. Attached is a brief description of the company's record maintenance system.

☐

D. The company has a supervisory review process for outbound marketing situations. Attached is a brief description of the company's review process.

☐

E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly. Attached is a brief description of the company's procedures.

F. **Actions Taken** - Select one of the options from the drop-down box below  
(by clicking the cell below and then clicking on the arrow to the right of the box directly below):

Select One

G. **Complaints Received** - Select one of the options from the drop-down box below (by clicking the cell below and then clicking on the arrow to the right of the box directly below):

H. **Sharing CPNI Information** - Select one of the options from the drop-down box below  
(by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company does not share CPNI with joint venture partners or independent contractors (except for billing and collection services)

For use when filing under seal.

**SNET America, Inc.**  
**Statement of CPNI compliance.**

In accordance with Section 64.2009(e) of the FCC's rules, SNET America, Inc. ("SAI") of how its operating procedures are adequate to ensure compliance with the CPNI rules for its customers.

SAI has no sales channels of its own for retail services, but sells such services through the sales channels of affiliated AT&T companies, each of which is charged with ensuring compliance with the requirements set forth in *Subpart U - Customer Proprietary Network Information* of the FCC Rules; 47 CFR §§ 64.2001 *et seq.* (the "FCC's CPNI rules"). SAI relies on the certifications of the affiliated AT&T companies to affirm that, as of the date of this certificate, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.

Prior to any solicitation for CPNI approval, SAI provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI, consistent with the notice rules set forth in 47 CFR §§ 64.2007 and 64.2008.

In accordance with the clarifying filing instructions provided by the Missouri Public Service Commission Staff in a February 18, 2011 email to the industry, the Company also provides the following link for access to AT&T's Annual CPNI Compliance Certificates Calendar Year 2010 filing submitted to the FCC (EB Docket No. 06-36)(ID =7021032838).

[http://fjallfoss.fcc.gov/ecfs/comment\\_search/execute?proceeding=06-36&applicant=AT%26T&lawfirm=&author=&disseminated.minDate=&disseminated.maxDate=&recieved.minDate=3%2F2%2F10&recieved.maxDate=&address.city=&address.state.stateCd=&address.zip=&daNumber=&fileNumber=&submissionTypeId=&checkbox\\_exParte=true](http://fjallfoss.fcc.gov/ecfs/comment_search/execute?proceeding=06-36&applicant=AT%26T&lawfirm=&author=&disseminated.minDate=&disseminated.maxDate=&recieved.minDate=3%2F2%2F10&recieved.maxDate=&address.city=&address.state.stateCd=&address.zip=&daNumber=&fileNumber=&submissionTypeId=&checkbox_exParte=true)

Based on Staff's clarifying filing instructions, the Company has checked Item H.1 based on the understanding that the Commission considers it to be the same as the following text:  
H.1. The company does not share CPNI with joint venture partners or independent contractors except to initiate, render, bill and collect for telecommunications (or as otherwise permitted without customer approval under the commission's rules under 4 CSR 240-33.160(2)(C)).



Annual Report of SNET America, Inc. DBA AT&T Long Distance East

for the calendar year of January 1 - December 31, 2010

**VERIFICATION**

The foregoing report must be verified by the oath of the President, Treasurer, General Manager or Receiver of the company. The oath required may be taken before any person authorized to administer an oath (Notary Public) by the laws of the State in which the same is taken.

**OATH**

State Of Connecticut }  
 County Of New Haven } ss:

SNET America, Inc. makes oath and says that  
 Name of Affiant (Company Official/Representative)

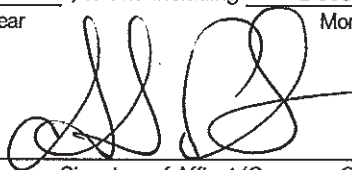
s/he is Assistant Secretary  
 Official Title of the Affiant (Company Official/Representative)

of SNET America, Inc.  
 Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 310 Orange Street, New Haven, CT 06510  
 Address and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, 2) examined (and updated as applicable) the company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct, and 3) read the CPNI Certification, chosen the applicable alternatives and attached all required documentation, which is a true and correct description of the company's CPNI safeguards.

from January 1, 2010, to and including December 31, 2010  
 Month/Day Year Month/Day Year



Signature of Affiant (Company Official/Representative)

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 25th day of May, 2011.

My Commission expires \_\_\_\_\_



Signature of Notary Public

When filing this form electronically, electronic signatures are acceptable. See the instructions for details.

**PHILOMENA FRANCO**

**NOTARY PUBLIC**

**MY COMMISSION EXPIRES FEB. 28, 2015**