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September 20, 2011

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of  
Rural Carriers and the Pennsylvania Universal Service Fund,  
Docket No. I-00040105; Docket Nos. C-2009-2098380 et. al.

Dear Secretary Chiavetta:

Please find enclosed AT&T's Reply Comments Concerning the Draft Staff Template, which was filed electronically today in the above-referenced matter.

Please contact me if you have any questions or concerns with this matter.

Very truly yours,

  
Michelle Painter

cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of AT&T's Reply Comments Concerning the Draft Staff Template upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Fairfax, VA this 20th day of September 2011.

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Michelle Painter

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access	)	
Charges and IntraLATA Toll Rates of	)	Docket No. I-00040105
Rural Carriers and the Pennsylvania	)	
Universal Service Fund	)	

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**AT&T'S REPLY COMMENTS CONCERNING THE DRAFT STAFF TEMPLATE**

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In accordance with the Commission's July 18, 2011 Opinion and Order in this matter, AT&T replies to the comments concerning the Staff's proposed template that were submitted on September 12, 2011 by the Pennsylvania Telephone Association ("PTA Comments") and by CenturyLink ("CTL Comments").

**I. TAB 2 "PHASE 1 REDUCTION SUMMARY"<sup>1</sup>**

Both CenturyLink (CTL Comments at 2) and PTA (PTA Comments at 3) suggest that they will not be completing the Phase 2 and 3 boxes included in this Tab in their Phase 1 submission. For example, PTA indicates its "understand[ing]" that its member companies are to complete information only for Phase 1. The Commission thus should clarify that all RLECs must complete **all** information requested in this tab -- including Phase 2 and Phase 3 access rate information -- in this initial phase of reductions, as well as in each subsequent phase.

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<sup>1</sup> In its initial comments, AT&T counted "Template Intro" as Tab 1. However, in their comments, CenturyLink and PTA counted "Statement of Income" as Tab 1. For the sake of consistency, AT&T is using CenturyLink's and PTA's numbering scheme in these reply comments.

