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March 13, 2009

Chairman Eddie Roberson
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Rulemaking to Establish a More Uniform Directory Assistance Policy for
Telecommunications Carriers in Tennessee

Docket No. 09-00012

Dear Chairman Roberson:

Attached please find an original and four copies of the comments of AARP
regarding Docket No. 09-00012, Rulemaking to Establish a More Uniform Directory
Assistance Policy for Telecommunications Carriers in Tennessee.

Sincerely,

Karin Miller
AARP Tennessee
Communications Director

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

RULEMAKING TO ESTABLISH A MORE)	
UNIFORM DIRECTORY ASSISTANCE)	
POLICY FOR TELECOMMUNICATIONS)	
CARRIERS IN TENNESSEE)	DOCKET NO. 09-00012
)	

AARP is a nonprofit, nonpartisan membership organization dedicated to making life better for people 50 and over. AARP has more than 40 million members nationwide and more than 731,000 members in Tennessee. We provide information and resources and engage in legislative, regulatory and legal advocacy.

The current rulemaking seeks to establish a “more uniform” directory assistance policy in Tennessee. The principle of universal service in telecommunications must support consumers’ use of - and not just access to - essential services, including directory assistance. AARP opposes restrictions on basic service, including adding or increasing charges for directory assistance. AARP supports providing customers an allowance of free directory assistance calls and providing exemptions from directory assistance charges for consumers over age 65 and the disabled. The availability of call allowances and exemptions should be better publicized, including through notices in customer bills.

Eliminating access to traditional directory assistance at an affordable rate (i.e. with free call allowances and exemptions) would lower service quality while raising rates. Callers have been contacting their local phone company for directory assistance

almost as long as there has been telephone service. Many consumers continue to rely on directory assistance provided by their local carrier, either out of habit, or because they do not have access to alternative directory assistance services.

Alternatives to traditional directory assistance do include online services, which require both a computer and access to the Internet. However, according to ConnectedTennessee, the majority of older households and lower income households do not have a home computer or home Internet service. According to figures from July 2008, for residents aged 65 and older, 44% have a home computer and 40% have home Internet service. For households earning less than \$25,000, 43% have a home computer and 37% have home Internet service. In fact, looking at the state as a whole, there are a significant number of Tennesseans who do not have computers (26%) or Internet service (32%). A ConnectedTennessee study from 2007 also showed lower penetrations of home computers and Internet service in the more rural parts of the state. Obviously an online alternative is not a realistic option for those households, predominately older and lower income, who do not have computers and Internet access.

Other options for directory assistance are costly, such as using cell phones, which charge for directory assistance with no free call allowance. Although several toll free, advertiser sponsored "1-800" directory assistance services are available, these often are not well advertised. Further, the consumer must know and remember the long toll-free number in order to use the service.

Even the printed telephone directory could disappear as an option for consumers looking for phone numbers. In other states, AT&T is seeking to do away with printed directories, which would force many callers to rely on directory assistance for phone

numbers. For example, the Public Utilities Commission of Ohio recently allowed AT&T to provide only an online, electronic version of the white pages directory, unless a customer specifically requested a printed directory be sent by mail. The state's utility consumer advocate, the Office of the Ohio Consumers' Counsel, opposed the move: "We're concerned that ... even people who have a computer will more than likely just call directory assistance and be billed for that," spokesman Marty Berkowitz said. "We feel that's just another way for the utilities to profit."¹

AARP also recommends the TRA require providers to do a better job of informing customers of the availability of call exemptions and waivers. According to information obtained by the Consumer Advocate in Docket No. 07-00269, little has been done to promote the availability of the exemptions. Customer education could include notices on phone bills, billing envelopes and the company websites. Customer service representatives should be trained to inform customers of call exemptions and allowances. Further, the TRA should include information about directory assistance on its website, and periodically issue public service announcements to media regarding directory assistance call exemptions and allowances.

In sum, AARP recommends that TRA adopt a uniform policy that includes free call allowances and exemptions for appropriate customer groups, combined with a customer education component. AARP's recommendations regarding directory assistance are consistent with the resolution adopted by the National Association of State Utility Commissioners (NARUC) in 2004 regarding competition in directory assistance.

¹ *AT&T gets to skip White Pages delivery*, February 12, 2009, The Columbus Dispatch

NARUC resolved that states must maintain their authority to require call allowances and call exemptions:

RESOLVED, That if the FCC decides to adopt policies to promote retail DA competition and a State adopts such, it shall not impair the ability of any State to:

1. Require that each subscriber is able to receive a minimum number of free telephone number inquiries.
2. Require that, consistent with the federal policy, disabled subscribers, including the blind and severely mobility or motion impaired, are able to access free telephone number inquiries.
3. Regulate the retail price subscribers are charged by providers of DA for telephone number inquiries.²

The TRA has the authority to help consumers save money through call allowances and exemptions. Although new technology has provided the platform for alternative directory assistance services, this technology is not available or affordable for many, especially older and lower income households. AARP urges the TRA to consider these factors in adopting a uniform policy for directory assistance.

² Sponsored by the Committee on Telecommunications Adopted by the NARUC Board of Directors March 10, 2004