

**WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION  
STAFF INVESTIGATION  
INTO THE BUSINESS PRACTICES OF**

**AT&T Communications  
of the Pacific Northwest, Inc.**

**UT-060962**

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## **PURPOSE, SCOPE, AND AUTHORITY**

### **Purpose**

The purpose of this investigation is to review the billing of collect pay phone calls from correctional facilities in the state of Washington by AT&T Communications of the Pacific Northwest, Inc. to determine if AT&T's business practices resulted in improper consumer billing and/or violations of state law or commission rules.

### **Scope**

The scope of the investigation includes AT&T's billing practices as reflected in its charges for collect pay phone calls from correctional facilities in the state of Washington from March through June 2005.

### **Authority**

Staff undertakes this investigation under the authority of the Revised Code of Washington (RCW) 80.01.040(3). In addition, RCW 80.04.070 makes it clear that the Commission is authorized to conduct such an investigation.

Complete versions of RCW 80.01.040 and RCW 80.04.070 are included in Appendix A.

## EXECUTIVE SUMMARY

This investigation was initiated by a complaint filed in August 2005, in which the consumer stated he had been improperly billed for pay phone collect calls from correctional facilities within the state of Washington. The consumer stated he did not receive a sufficient explanation of the disparate charges from AT&T.

When staff found that all customers who accepted collect calls during portions of March, April, May, and June 2005 from the Airway Heights Correction Center in Spokane were charged improper rates by AT&T, Business Practices initiated a formal investigation.

On February 28, and March 30, 2006, the commission sent AT&T data requests asking AT&T to furnish information about the billing of the correctional facility calls, and to supply staff with a list of customers who were improperly charged during the March through June 2005 calling period.

AT&T's response to both data requests was that it sold its correctional facility pay phone business to another company so it no longer had the records staff requested and couldn't furnish the information required by the data requests. Business Practices staff found AT&T uncooperative and their explanation of the improper charges insufficient.

On July 13, 2006, the commission served AT&T with an Order to Produce Records. In the order the commission stated that AT&T was required by law to maintain records of its operations and to furnish those records to the commission upon request.

On August 22, 2006, AT&T furnished the requested records.

Upon review of the records, staff found that AT&T, through its billing agent, Zero Plus Dialing, Inc. (ZPDI), improperly billed over [REDACTED] customers for the collect calls from the Airway Heights Correctional Facility and the Washington State Penitentiary. Staff finds AT&T in violation of RCW 80.36.130 which requires a telecommunications company to charge the rates it has on file and in effect in its published schedule.

Commission staff finds a total of [REDACTED] violations.

## **BACKGROUND**

### **Introduction**

This investigation was prompted by a consumer complaint that alleged AT&T was billing improper charges for collect pay phone calls placed from correctional facilities in the state of Washington.

### **Focus of the Investigation**

The focus of this investigation was to determine if AT&T had improperly billed for collect pay phone calls from the Airway Heights Correctional Facility in Airway Heights or any other correctional facility in Washington during the period of March through June 2005.

The focus of the investigation was also to determine if AT&T had failed to properly retain billing records for operations that took place during that same period of time as required by WAC 480-120-349 and Title 47, Code of Federal Regulations (CFR), Part 42, the Preservation of Records of Communication Commission Carriers as published by the Federal Communications Commission.

### **Investigation Staff**

M. Carlene Hughes – Compliance Program Coordinator, Business Practices Investigations

## FINDINGS, DISCUSSION, AND RECOMMENDATIONS

*RCW 80.36.130, Published rates to be charged – Exceptions.*

*(1) Except as provided in RCW [80.04.130](#) and [80.36.150](#), no telecommunications company shall charge, demand, collect or receive different compensation for any service rendered or to be rendered than the charge applicable to such service as specified in its schedule on file and in effect at that time, nor shall any telecommunications company refund or remit, directly or indirectly, any portion of the rate or charge so specified, nor extend to any person or corporation any form of contract or agreement or any rule or regulation or any privilege or facility except such as are specified in its schedule filed and in effect at the time, and regularly and uniformly extended to all persons and corporations under like circumstances for like or substantially similar service.*

A complete version of RCW 80.36.130 is included in Appendix B.

### **Consumer Complaint 94348**

This complaint was filed with the commission in August 2005, by a consumer who stated that he accepted collect pay phone calls from correctional facilities in the state of Washington, and that the charges for the calls carried by AT&T were inconsistent depending on which company billed for the calls (AT&T, Correctional Billing, or ZPDI<sup>1</sup>).

The consumer's complaint documents show that charges for a collect call from the Airway Heights Correctional Facility, dated March 17, billed by ZPDI, were billed at \$3.95 for a service charge, \$.89 per minute charge, and a \$.47 PCC charge (Prison Collect with Controls service) for a total charge of \$22.22. The correct charge for this call should have been \$15.75 (\$3.95 service charge plus \$.59 per minute).

A copy of the customer's bill for the March 17 call is included in Appendix C.

Previous collect calls accepted as recently as March 10, and billed directly by AT&T, were correctly billed at \$15.75. Commission staff found that the bills issued by ZPDI, billed on behalf of AT&T, were improperly billed.

In response to the customer's complaint, AT&T filed the following responses:

August 10, 2005:

“...AT&T is in transition with the prison services billing and right now there's only a few people that know what's going on. I have heard the lady we need to work with will be back in the office 8/15/05. I will hopefully hear something before you leave. I'm sorry this is delayed, but really have no options as this vendor is the only one that has access to the billing system.”

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<sup>1</sup> Correctional Billing and ZPDI are billing agents used by AT&T to bill for the collect calls through the customer's local carrier (LEC).

On September 7, 2005, commission staff noted that AT&T had agreed to provide a credit for the calls that were billed incorrectly for this customer. However, staff also noted that the credit was incorrect. When asked why the credited amounts were not issued according to the charges shown in its price list, AT&T responded that the “business group” handling this issue [credit] was using an incorrect price sheet.

September 8, 2005:

“These calls are prison collect calls. AT&T used a vendor to bill these calls on our behalf. We would not have access to the bills, since they are billed by the vendor. However, we did request that ZPDI review all the bills they sent this customer and they rerated back to the 11/04 statement. Since the change happened within the past year, there would be no need to go back 2 years. Also, the price sheet will be easier to provide if I know what facility or facilities Mr. XXX is receiving calls from. Can you ascertain that from him?

On September 9, 2005, AT&T sent a copy of its price list page for collect calls from correctional facilities effective March 2005.

A copy of the price list page is included in Appendix D.

On October 6, 2005, to get clarification on this billing issue, staff sent AT&T the following additional questions:

- 1) Who is the vendor for the prison pay phone calls?
- 2) Did ZPDI bill for all of the vendor's calls?
- 3) What were the incorrect rates the vendor charged for these calls?
- 4) Were all prison pay phone calls in Washington incorrectly charged from November 2004 forward?
- 5) When did AT&T become aware of the incorrect billing?
- 6) What was the time period that the vendor charged incorrectly for the prison pay phone calls in Washington?
- 7) What action did AT&T take when it found out the vendor had incorrectly charged for the calls?

On October 12, 2005 AT&T responded:

“AT&T sold all correctional facility holdings on June 1, 2005. Because of this, all of our vendor contacts no longer exist. We have pleaded with the new group to look at this case for us since the calls were prior to that date. We hope to have some of your answers by next week. Since there are many different vendors involved with correctional calls I may not be able to speak for all facilities, just this specific one. I will let you know when I hear more.

On October 27, 2005, AT&T responded with only partial answers to staff's questions:

**1) Who is the vendor for the prison pay phone calls?**

“--AT&T is LD carrier at Airway Heights and VAC is the service provider. Zero Plus Dialing is the billing agent. AT&T provides both the Local and LD at Washington DOC Center for Women. T-Netix/CBS is the service provider and billing agent.”

**2) Did ZPDI bill for all of the vendor's calls?**

“No, AT&T billed for calls through 3/28/2005 and then Zero Plus Dialing took over the billing at Airway Heights. Correctional Billing Service (CBS ), has always billed at WA DOC Center for Women.”

**3) What were the incorrect rates the vendor charged for these calls?**

“Zero Plus Dialing charged the customer for an InterLata InterState call at \$3.95 connection fee, \$0.89/minute and a \$0.47 PCC charge for a total of \$22.22 when customer should have been charged for an InterLata IntraState call of \$3.95 and \$0.59/minute for a total of \$15.75.”

**4) Were all prison pay phone calls in Washington incorrectly charged from November 2004 forward?**

“No.”

**5) When did AT&T become aware of the incorrect billing?**

“In June when a PUC complaint was received. It was also corrected in June.”<sup>2</sup>

**6) What was the time period that the vendor charged incorrectly for the prison pay phone calls in Washington?**

“April, and May.”

**7) What action did AT&T take when it found out the vendor had incorrectly charged for the calls?**

“AT&T immediately issued a credit for the difference and corrected the problem in all systems.”

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<sup>2</sup> Consumer complaint 93691 was received by the commission on June 2, 2005. AT&T was notified on the same date that improper charges were being billed for correctional facility collect calls.



On November 9, 2005, staff asked AT&T for additional information and AT&T responded:

**“... 3) If AT&T became aware of incorrect billing in June, what were the incorrect charges, where were they billed, and how many customers were affected?”**

Incorrect charges where customer was charged same connection fee, but at an IntraLata IntraState rate of \$0.89/minute plus taxes and fees. I do not know how many customers were effected and this cannot be provided.”

**Data Requests**

As staff found that AT&T had improperly billed customers who accepted collect calls from the Airway Heights Correctional Facility, staff began a formal investigation into the improper billing. In order to determine the extent of the overcharges, on February 28, 2006, the commission sent AT&T a data request requiring AT&T to furnish responses to the questions or statements shown below.

AT&T was asked to respond by no later than March 14, 2006.

On March 24, 2006, after having been granted additional time in which to respond, AT&T responded to the commission data request. AT&T did not furnish complete answers to all of the questions posed in the data request. AT&T’s answers are shown below.

<b>February 28, 2006 Data Request</b>	<b>AT&amp;T March 24, 2006 Response</b>
1. For which correctional facilities in the state of Washington did AT&T provide pay phone services during 2004 and 2005?	Between 2004 and part of 2005, AT&T provide some service to some correctional facilities in Washington State under the terms of a contract and its amendments with the Department of Corrections. Those facilities included: ...Airway Heights... (see Appendix E for complete list).
2. Did AT&T provide both services and billing during 2004 and 2005 for each of these facilities? If not, please explain which services were provided by another company, what date the services were transferred to another company, and the name of the company to which services were transferred, for each facility.	No, AT&T did not provide all service nor billing under the terms of the contract or its amendments. Under the terms of the contract and its amendments, AT&T’s subcontractors (Verizon, Qwest, PTI and T-Netix) generally provided the pay phone equipment, local service, intrastate toll services, call aggregator service and operator service. AT&T generally provided interLATA toll service. AT&T sold its public communications business, including prison payphones, to Global Tel*Link Corporation (“GTL”). The sales transaction closed and all assets, contracts, employees and business records transferred on Jun 1, 2005. GTL is a registered payphone provider with the WUTC.

<p>3. AT&amp;T has informed staff “AT&amp;T sold all correctional facility holdings on June 1, 2005.” Please fully explain this statement and the transaction it references.</p>	<p>See Response to Request No. 2 above.</p>
<p>4. AT&amp;T states that Zero Plus Dialing took over billing at Airway Heights Correction Facility on March 29, 2005. Is that correct?</p>	<p>GTL would be in the best position to answer this question. AT&amp;T recalls that Zero Plus Dialing took over bill processing for certain of AT&amp;T prison locations in early 2005, but AT&amp;T no longer has specific information as to whether Airway Heights Correction Facility was included.</p>
<p>5. Our records indicate that Washington state customers were charged a \$3.95 connection fee, \$0.89 per minute and a \$0.47 PCC charge in error for prison collect calls. During what time period did the incorrect billing take place?</p>	<p>AT&amp;T’s price list accurately reflects a \$3.95 connection fee along with reference to AT&amp;T’s Tariff FCC No. 27. AT&amp;T attaches hereto, as <b>Exhibit A</b>, its price list. GTL or Zero Plus Dialing would be in the best position to respond to the rates applied to the billing submitted to customers.</p>
<p>6. Supply a list of all Washington customers billed the incorrect prison collect call charges, including a statement of the incorrect amount charged to each customer and the time period it was charged.</p>	<p>AT&amp;T does not have the requested information. GTL may hold information responsive to this request.</p>
<p>7. Did AT&amp;T credit these customers for the incorrect charges?</p>	<p>To the extent that AT&amp;T became aware that customers were incorrectly billed, AT&amp;T has either re-rated or credited customer bills.</p>
<p>8. Supply a list of all Washington customers who received a credit for the incorrect collect pay phone charges, including a statement of the credits received by each customer and when such credits were made.</p>	<p>See AT&amp;T’s response to Request No. 7. AT&amp;T believes GTL may be in the best position to respond to this request. To date, however, AT&amp;T has re-rated or credited the following customers: Janice L*, Richard L* and Rochelle B*.</p>

Copies of the February 28, 2005 data request and AT&T’s response are included in Appendix E.

**Second Data Request**

Staff found that AT&T was required to retain records for its operations that took place during the March through June 2005 time period during which the improper charges occurred. Staff found that while the business operations were sold on June 1, the records for the charges and billing that took place prior to the sale, is the responsibility of AT&T.

On March 30, 2006, the commission issued a second data request to AT&T. This data request stated, in part:

*The Washington Utilities and Transportation Commission recently sent you a data request and informed you that commission staff is conducting an investigation into the business practices of AT&T. The basis for this investigation is consumer complaints that allege AT&T billed incorrect amounts for prison pay phone collect calls in the state of Washington. The data request asked AT&T to furnish specific customer lists, and billing and refund records related to the incorrectly billed calls.*

*AT&T did not furnish the requested information.*

*Under RCW 80.04.070, the commission has the right to inspect the accounts, books, papers, and documents of any telecommunications company doing business in this state. Additionally, as the carrier who billed these customers, it is AT&T's responsibility to maintain business records for its operations as stated in WAC 480-120-349:*

*Retaining and preserving records and reports.*

*(1) Companies must keep all records and reports required by these rules or commission order for three years unless otherwise specified in subsection (2) of this section. No records may be destroyed before the expiration of three years or the time specified in subsection (2) of this section, whichever is applicable.*

*(2) Companies must adhere to the retention requirements of Title 47, Code of Federal Regulations, Part 42, Preservation of Records of Communication Common Carriers published by the Federal Communications Commission. The effective date is stated in WAC [480-120-999](#).*

*AT&T must provide the following information:*

- *AT&T states that Zero Plus Dialing took over billing of AT&T calls at Airway Heights Correction Facility on March 29, 2005. Is that correct?*
- *Our records indicate that Washington State customers were charged a \$3.95 connection fee, \$0.89 per minute and a \$0.47 PCC charge in error for prison collect calls. During what time period did the incorrect billing take place?*
- *Supply a list of all Washington customers billed the incorrect prison pay phone collect call charges, including a statement of the incorrect amount charged to each customer and the time period it was charged.*
- *Supply a list of all Washington customers who received a credit or refund for the incorrect collect pay phone charges, including a statement of the credits or refunds received by each customer and when such credits or refunds were made.*

Response to the second data request was due April 25, 2006.

On April 25, 2006, AT&T again responded. AT&T submitted “supplemental responses” to its first letter. The cover letter for the supplemental response stated:

“I write in response to your recent letter of March 30, 2006, in which you suggest that AT&T Communications of the Pacific Northwest, Inc. (“AT&T”) did not respond to data requests regarding its prison collect service. As you note in your letter, WAC 480-120-349 requires that AT&T retain and preserve records and reports required by the rules. It does not, however, require that AT&T create records and reports for investigations wherein the material sought in the investigation did not and does not exist within AT&T. This is the situation we face in regard to your questions. That said, however, we will endeavor to provide you with greater information in our supplemental responses enclosed with this letter.”

Staff found the supplemental responses from AT&T were still incomplete and did not furnish the information requested. AT&T responded:

<b>March 30, 2006 Data Request</b>	<b>AT&amp;T April 25, 2006 Response</b>
<p>AT&amp;T states that Zero Plus Dialing took over billing of AT&amp;T calls at Airway Heights Correction Facility on March 29, 2005. Is that correct?</p>	<p>GTL would be in the best position to answer this question. AT&amp;T recalls that Zero Plus Dialing took over bill processing for certain of AT&amp;T’s prison locations in early 2005, but AT&amp;T no longer has specific information as to whether Airway Heights Correction Facility was included.</p> <p><u>Supplemental Response:</u> Our records indicate the parties finalized the agreements terms in mid-March 2005, and although AT&amp;T has the final contract it cannot presently locate the executed version.”</p>
<p>Our records indicate that Washington State customers were charged a \$3.95 connection fee, \$0.89 per minute and a \$0.47 PCC charge in error for prison collect calls. During what time period did the incorrect billing take place?</p>	<p>AT&amp;T’s price list accurately reflects a \$3.95 connection fee along with reference to AT&amp;T Tariff FCC No. 27. AT&amp;T attached hereto, as Exhibit A, its price list. GTL or Zero Plus Dialing would be in the best position to respond to the rates applied to the billing submitted to customer.</p> <p><u>Supplemental Response:</u> According to GTL, prison collect calls were rated either by T-Netix or Correctional Billing Services (“CBS”). The calls were then billed to the called party by either CBS or Zero Plus Dialing through the underlying local exchange carrier. AT&amp;T’s respective tariffs reflect the appropriate rate for AT&amp;T’s service, but AT&amp;T does not itself apply the rate to the bills. Because AT&amp;T neither has records responsive to this request or ready access to other companies’ records, it cannot directly respond to this question.</p>

	<p>AT&amp;T has, however, requested that GTL determine whether there were billing problems, apart from the three customer complaints described below. AT&amp;T will report GTL’s findings as soon as they are available.”</p>												
<p>Supply a list of all Washington customers billed the incorrect prison pay phone collect call charges, including a statement of the incorrect amount charged to each customer and the time period it was charged.</p>	<p>AT&amp;T does not have the requested information. GTL may hold information responsive to this request.</p> <p><u>Supplemental Response:</u> AT&amp;T did not generate customer lists for inmate collect calling. Rather, AT&amp;T would have seen the destination call number from electronic batch-feed records, and from this information, AT&amp; T did not generate a “customer list” generally nor could it generate a list of allegedly miss-billed customers.”</p>												
<p>Supply a list of all Washington customers who received a credit or refund for the incorrect collect pay phone charges, including a statement of the credits or refunds received by each customer and when such credits or refunds were made.</p>	<p>See AT&amp;T response to Request No. 7. AT&amp;T believes GTL may be in the best position to respond to this request. To date, however, AT&amp;T has re-rated or credited the following customers: Janice XXX, Richard XXX and Rochelle XXX.</p> <p><u>Supplemental Response:</u> For the reasons stated in supplemental response to Request No. 5, AT&amp;T does not have a list of miss-billed customers beyond those brought to its attention through the complaint process. With response to those customers identified the following action has taken place:</p> <table border="1" data-bbox="657 1144 1377 1554"> <thead> <tr> <th>Customer Name</th> <th>Problem Alleged<sup>3</sup></th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>B*, Rochelle</td> <td>Auto quote allegedly quoted a local rate, but Brickman was billed toll rate</td> <td>Credited \$276.85</td> </tr> <tr> <td>L*, Janice</td> <td>Toll rate allegedly incorrect</td> <td>Credited \$59.13</td> </tr> <tr> <td>L*, Richard</td> <td>Toll rate allegedly incorrect</td> <td>Credited \$155.67</td> </tr> </tbody> </table>	Customer Name	Problem Alleged <sup>3</sup>	Action	B*, Rochelle	Auto quote allegedly quoted a local rate, but Brickman was billed toll rate	Credited \$276.85	L*, Janice	Toll rate allegedly incorrect	Credited \$59.13	L*, Richard	Toll rate allegedly incorrect	Credited \$155.67
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L*, Richard	Toll rate allegedly incorrect	Credited \$155.67											

A copy of the second data request and the AT&T response letter is included in Appendix F.

<sup>3</sup> “AT&T merely recites here the alleged problem and resolution and notes that, for example, Rochelle B\* did not supply a copy of her bills and she may have been provided more of a credit than she was due, if any.”

### **Order to Produce Records**

As AT&T failed to respond to the commission's data request with complete information, the commission issued an Order to Produce Records on July 13, 2006. AT&T was ordered to produce a list of all customers that were improperly billed for correctional facility collect calls during March, April, May, and June 2005, and a list of all customers that received a refund or credit from AT&T for the improperly billed calls.

The lists were due by no later than August 15, 2006.

A copy of the Order to Produce Records is included in Appendix G.

On August 16, 2006, AT&T filed with the commission its response to the Order to Produce Records, and an Affidavit of John Hyland.

AT&T's response to the commission's order stated in part:

“As a preliminary matter, AT& T does not possess the requested information nor can AT&T generate such as list based on the information in AT&T possession.<sup>4</sup> The records and systems necessary to produce such a list are owned and controlled by Global Tel\*Link Corporation (“GTL”), not AT&T. Indeed, AT&T has never known or possessed the names and addresses of customers as a part of its accounts, books, papers, and documents. The attached affidavit describes generally the prison collect service rating and billing along with the systems that AT&T formerly possessed, that are now owned by GTL...

GTL currently is gathering the information responsive to the Commission's Order but has yet to provide any of that information to AT&T. AT&T will continue to work with GTL to provide as much of the information sought as possible. Based on its latest contacts with GTL, AT&T anticipates that it will be able to provide a substantive response from GTL by no later than Friday, August 18...”

The affidavit from John Hyland (former director of AT&T National Public Markets Division which was responsible for AT&T public and inmate telecommunications service and Vice Chairman of GTL) describes how AT&T was not able to provide a list of miss-billed customers to the commission. Mr. Hyland stated:

“For Washington correctional facilities, AT&T provided some long distance and toll calling only. Thus, AT& T was not the underlying “PIC’d” local carrier such that it would have had the local billing arrangements with the *collect-called* customer. Consequently, AT&T has to make special arrangements for billing these customers. In the time frame under consideration (i.e. March through June 2005), prison collect calls were rated either by T-Netix or Correction Billing Services (“CBS”) for AT&T. The calls were then billed to the called party by

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<sup>4</sup> “The list assumes there is a problem in billing that AT&T is not currently aware actually existed beyond the three complaints received from the Commission, only two of which appeared to be actually mis-billed.”

either CBS or Zero Plus Dialing through the underlying local exchange carrier usually Qwest or Verizon.

In addition to the special billing arrangements, AT&T did not nor does it know the name and address of the customers. All its relevant data has ever shown is the calling and called party telephone numbers, the duration of the call, the date of the call and –after rating—the charges applied to the call, Thus, all AT&T cannot produce any names or addresses.

On or about June 2, 2005, AT&T transferred, pursuant to the sales contract, its systems and service associated with inmate calling in Washington State to GTL. GTL and AT&T have worked together to provide information to the Commission’s Staff in regard to at least customer complaints, and AT&T anticipated that GTL would continue to work cooperatively to provide the Commission with any other information requested.

Generally, the former AT&T system that would have been employed to generate lists of information is called the PADD system. As AT&T no longer owns the system, it cannot generate list or provide information sought in the Commission’s Order.

AT&T has made efforts to contact GTL seeking assistance in responding to the Commission’s Order, but to date those efforts have not produced complete results...”

Copies of AT&T’s response to the commission’s Order to Produce and Mr. Hyland’s affidavit are included in Appendix H.

**Response to Order to Produce Records**

On August 22, 2006, Greg Kopta, attorney with Davis Wright Tremaine LLP, representing AT&T, furnished two Excel spreadsheets which list all calls from both Airway Heights Correctional Facility and the Washington State Penitentiary that were improperly billed between March 15, 2005 and June 15, 2005. The spread sheet includes a “variance” column that shows the amount the call was over-billed.

From its own records staff finds that AT&T over-billed collect call customers who accepted collect pay phone calls from either the Airway Heights Correctional Facility or the Washington State Penitentiary in the following amounts:

<b>2005 Call Dates</b>	<b>Number of Calls</b>	<b>Overcharges</b>
March 14-April 15	██████████	\$ ██████████
April 16 – May 15	██████████	\$ ██████████
May 16-June 15	██████████	\$ ██████████
<b>Totals</b>	██████████	\$ ██████████

In response to asking AT&T if it had refunded any of the more than [REDACTED] overcharges to these customers, AT&T responded:

“AT&T provided refunds to three customers who filed complaints with the WUTC.”



## **SUMMARY OF FINDINGS AND RECOMMENDATION**

Commission staff finds AT&T in violation of RCW 80.36.130 improper billing on [REDACTED] occasions.