

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

07-15-11
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Order Instituting Investigation on the Commission's Own Motion Into the Operations, Practices, and Conduct of OSP Communications LLC, and John Vogel, an Individual, to Determine Whether OSP Communications LLC and John Vogel Have Violated the Laws, Rules and Regulations of this State in the Provision of Operator and Calling Card Services to California Consumers; and Whether The Billing Resource LLC, a Delaware Corporation, and The Billing Resource LLC d/b/a/ Integretel, a California Corporation, Should Refund and Disgorge All Monies Billed and Collected on Behalf of OSP Communications LLC.

I.11-05-028
(Filed May 26, 2011)

**MOTION OF
PACIFIC BELL TELEPHONE COMPANY
D/B/A AT&T CALIFORNIA (U-1001-C)
PURSUANT TO ORDERING PARAGRAPH EIGHT**

Pacific Bell Telephone Company d/b/a AT&T California (U-1001-C) (hereinafter "AT&T California"), pursuant to Ordering Paragraph 8 of the **Order Instituting Investigation on the Commission's Own Motion Into the Operations, Practices, and Conduct of OSP Communications LLC, and John Vogel, an Individual, to Determine Whether OSP Communications LLC and John Vogel Have Violated the Laws, Rules and Regulations of this State in the Provision of Operator and Calling Card Services to California Consumers; and Whether The Billing Resource LLC, a Delaware Corporation, and The Billing Resource LLC d/b/a/ Integretel, a California Corporation, Should Refund and Disgorge All Monies Billed and Collected on Behalf of OSP Communications LLC**, filed May 26, 2011 (hereinafter, "OII"), hereby submits the following motion for protection of the last seven pages of Attachment 28C of the Staff Report. OII Ordering Paragraph 8 requires AT&T California to file this motion by today, July 15, 2011.

Pursuant to Ordering Paragraph 8 of the OII, Staff served on AT&T California proposed public and proposed confidential versions of its Staff Report. It appears that Staff proposes to make Attachment 28C of the Staff Report public. The last seven pages (labeled Attachment A) of Attachment 28C appear to contain switch records, which consist of detailed information regarding calls made by customers, including telephone numbers and address information. This information appears to be confidential to the customers placing and receiving these calls, and subject to protection from public disclosure pursuant to one or more of the following: Public Utility Code sections 583 and 2891, General Order No. 66-C, Commission Decision Nos. 92860 and 93361, and AT&T California Tariff Rules 34 and/or 35. The records could also contain Customer Proprietary Network Information (“CPNI”) protected pursuant to 47 U.S.C. § 222 and 47 C.F.R. § 64.2001 *et seq.*

AT&T California is currently working with Staff to determine whether redaction is a practical means of addressing this issue, but no resolution has yet been reached. In order to preserve the confidentiality of this material pending ongoing discussions with Staff, AT&T California hereby requests that the last seven pages of Attachment 28C be treated in a confidential manner unless and until an appropriate means of redaction is identified.

Respectfully submitted,

/s/
David J. Miller
AT&T Services Legal Department
525 Market Street, Room 2018
San Francisco, CA 94105
Tel: (415) 778-1393
Fax: (281) 664-9478
davidjmiller@att.com

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