Southern Telecom

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20th Floor
Bin 10204
Atlanta, GA 30308
Phone: 404.506.1555

January 17, 2023

Mrs. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334

RE: Southern Telecom, Inc., Annual Report for the Fiscal Year Ended December 31, 2019

Dear Ms. Tanner:

Southern Telecom, Inc. responds to the directive in the above-referenced matter requiring telephone companies and directory-listing providers to file a plan with the Georgia Public Service Commission.

Please see the enclosed 16 copies of Southern Telecom, Inc.'s Georgia Violence Shelter Confidentiality Affidavit.

Thank you for your assistance, and please contact me if you have any questions.

SINCERELY,



Laura A. Seal
Contract Administrator

Enclosure

AFFIDAVIT

GEORGIA

FULTON COUNTY

Personally appeared before me, an officer duly authorized to administer oaths, Michael E. Britt, who, after being duly sworn, deposes and says that he is the President and CEO of the Applicant, certified telephone service provider or directory information provider.

1.

I make this affidavit on the basis of my personal knowledge.

2.

Southern Telecom, Inc. does not provide consumer telephone services or directory information.

3.

I have read the May 13, 2005 Order (Attachment "A" and the August 30, 2005 Amendatory Order (Attachment "B") in Georgia Public Service Commission ("Commission") Docket No. 19553-U, Implementation of Senate Bill 147, the Family Violence Shelter Confidentiality Act of 2004 (O.C.G.A. § 46-5-7). I have also read the Commission Staff Memorandum dated May 1, 2007 (Attachment "C") that summarizes the requirements under O.C.G.A § 46-5-7 and the Commission orders issued pursuant to that Code Section of providers of telephone services in the State of Georgia or any other entity that publishes, disseminates, or otherwise provides telephone directory information or listings of telephone subscribers in the State of Georgia.

4.

The Applicant agrees that it will satisfy the minimum requirements set forth in the Commission orders and Staff Memorandum referenced in paragraph 2 of this affidavit to protect the confidentiality of the location and address of family violence shelters in the State of Georgia.

Pursuant to O.C.G.A. § 46-5-7, the Applicant submits this affidavit as its plan to protect the confidentiality of the location and address of family violence shelters in the State of Georgia.

FURTHER AFFIANT SAITH NOT.

MICHAEL E. BRITT
PRESIDENT AND CEO
SOUTHERN TELECOM, INC. (COMPANY)

SIGNATURE

SUBSCRIBED AND SWORN BEFORE ME THIS 24 DAY OF JANUARY, 2023.

NOTARY SEAL (SEAL)



Attachment "A"

RECEIVED
MAY 13 2005
EXECUTIVE SECRETARY
G.P.S.C.

COMMISSIONERS:
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H. DOUG EVERETT
STAN WISE

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DOCUMENT # 19553
DOCUMENT # 82508

Docket 19553-U

In Re: Implementation of Senate Bill 147, the Family Violence Shelter Confidentiality Act of 2004 (O.C.G.A. § 46-5-7)

ORDER

I. Background

At its September 21, 2004 Administrative Session, the Georgia Public Service Commission ("Commission") voted to establish this docket for the implementation of the 2004 Family Violence Shelter Confidentiality Act ("Act"), O.C.G.A. § 46-5-7, passed by the General Assembly. The Act requires all telephone companies and directory listing providers to file plans with the Commission prior to January 1, 2005 setting forth in detail how the companies will protect the confidentiality of the location and address of family violence shelters in the state. O.C.G.A. § 46-5-7(a). Per the Act, these plans should describe the manner in which providers will identify family violence shelters in the state and keep confidential the location and address of such shelters. *Id.*

On September 24, 2005, the Commission Staff issued a letter to all certified incumbent local exchange carriers and facilities-based local exchange carriers. The letter sought comment on the format and criteria for the evaluation of compliance plans and encouraged interested parties to work towards consensus. Responses were filed by Southeastern Competitive Carriers Association and Qwest Communications Corporation, SBC Telecom, Inc. Joint comments were filed by BellSouth Telecommunications, Inc., Georgia Telephone Association, AT&T Communications of the Southern States, LLC and MCImetro Access Transmission Services LLC. In the closing weeks of 2004, numerous providers filed plans in order to comply with the Act.

Pursuant to the Act, the Commission must approve the plans within a reasonable time. O.C.G.A. § 46-5-7(c). In order to be approved, a plan must be found to be "reasonably effective in identifying the family violence shelters in the state and in maintaining the confidentiality of the location and address of such family violence shelters." *Id.* The Staff reviewed the plans filed by each local exchange carrier and

recommended to the Commission that it not approve any of the plans at this time. The Staff further recommended that the Commission approve minimum requirements for all telephone companies and directory listing providers as set forth below. All parties are required to file their plans incorporating the minimum requirements within 30 days from the date of the Commission order. O.C.G.A. § 46-5-7(c).

II. Minimum Requirements

The Staff recommended that the Commission approve the following minimum requirements for the determination of whether a plan is compliant:

A. Identification of Shelters

1. Georgia Commission on Family Violence- Maintained List of Shelters

Approved "Family Violence Shelters": The Georgia Department of Human Resources ("Department") is responsible for posting a current, accurate, updated list of approved "family violence shelters" on a quarterly basis. This list is posted at http://gadfhs.org/familyviolence/. A specific company employee(s) should be responsible for obtaining the periodically updated list of approved "family violence shelters" on the designated date for list update. This list should be distributed to designated personnel who are responsible for checking this list against their own records to confirm that all the current approved "family violence shelter" accounts are properly marked and protected. All telephone companies and directory listing providers will utilize this database in cooperation with Georgia Commission on Family Violence only.

2. Shelter Self-Identification. In addition to the use of Official Lists, each telephone provider should rely on self-identification by the shelters.

(a) *Telephone Provider's Service Customers.* Shelters of this nature are included primarily within the Small Business Services segment of the retail operations. When a customer or potential customer orders new or additional services, the SBS Sales Associate asks a series of questions intended to elicit the nature of the customer's business, including its identity as a shelter. The types of questions that might be asked include:

- What type of service does your business provide?
- Tell me how your business operates?
- If a non-profit organization, what type of organization?
- Is this a shelter?
- If a shelter, what type of shelter?

B. Special Handling of Shelter Customers-Designated Representatives

Once a customer has been identified as a shelter customer (through either of the means described in section I. A above) the customer is assigned to a specially trained, designated service representative. This representative will contact the shelter to verify its status as a shelter.

C. Directory Publishing

1. Telephone Provider's Service Customers. Each provider's shelter customer accounts are subject to special handling between the designated representative and the provider's directory publishing unit.

(a) All new directory listings are checked against the Official Lists prior to electronic or paper directory preparation in order to ensure identification by use of an address suppression marker and that all identified listings are locked from address updates.

(b) On or just before directory ship date for both White and Yellow Page products, a final comparison of the Official Lists to the galley pages is undertaken. If a discrepancy exists on the galley pages, the service order coach corrects the galley and contacts the designated representative.

D. Directory Assistance/Operator Services

It is possible that batterers, or others foiled in their attempts to locate the address of a shelter by reference to published directories, will contact operator services/directory assistance for such purpose. Telephone Providers should address the possibility with the following procedures:

1. Telephone Provider's Service Customers. Service orders for shelter customers shall contain a code indicating that the address is not to be listed. As a result, only the listed name and telephone number will be passed to the directory assistance database- no address details are passed.

2. No Address. When no address is provided in the database, the operator provides only the phone number. If the customer requests the listing at a specific phone number, operators are instructed to advise the customer that they have the listing name and number but no address details are available.

E. Contact with Telephone Providers Customer Contact Personnel

It is possible that batterers, or others foiled in their attempts to locate the physical address of a shelter by reference to published directories or directory assistance will contact telephone providers customer contact personnel- repair centers, business offices, help desks, etc.- in an attempt to determine the physical location or physical address of

"family violence shelters" or other shelters. Telephone providers should address this possibility with the following procedures:

1. Calls to Business Offices. Retail accounts that have been identified as "family violence shelters" or other shelters are restricted access accounts (see section B above) that can only be accessed by designated employees.

2. Social Engineering. Personnel should be instructed not to provide any proprietary information to persons with whom they interact unless the person's identity has been authenticated and there is a valid business reason for providing the requested information.

3. Telemarketing/Telesales/Direct Marketing. All restricted accounts are suppressed from all outbound sales efforts, whether via telephone, direct mail, internet or otherwise. Without limitation, all such accounts are suppressed from any customer list, lead list or the like provided to any third party that does or may sell the telephone providers services or such third party's services.

F. Requirements upon Discovery of Disclosure

All plans must set forth a process to be implemented upon discovery of disclosure, in any form, of shelter physical location information that includes the following:

- Notifying the Georgia Commission on Family Violence by telephone within 24 hours after such discovery;
- Providing written notice to the Georgia Public Service Commission no later than 7 days after such discovery; and
- Notifying the shelter by telephone as soon as possible but no later than 24 hours after such discovery.

The Commission finds Staff's recommended minimum requirements to be reasonable. Compliance with these minimum requirements will result in a plan that is "reasonably effective in identifying the family violence shelters in the state and in maintaining the confidentiality of the location and address of such family violence shelters." None of the plans that have been filed with the Commission thus far comply with these minimum requirements, and none of these plans meet the standard set forth in the Act for the identification of family violence shelters and the maintenance of their confidentiality. Therefore, each plan is rejected, and each telephone provider must file an amended plan within 30 days from the date of this order that complies with the minimum requirements set forth herein.

WHEREFORE IT IS,

ORDERED, that each of the plans thus far filed with the Commission are hereby rejected.

ORDERED FURTHER, that the Commission approves the minimum requirements set forth herein for plans to be deemed in compliance with O.C.G.A. § 46-5-7.

ORDERED FURTHER, that in accord with O.C.G.A. § 46-5-7(c), all providers of telephone service must file plans within 30 days from the date of this order with the Commission that complies with the minimum requirements set forth herein.

ORDERED FURTHER, that all findings, conclusions and decisions contained within the preceding sections of this Order are adopted as findings of fact, conclusions of law, and decisions of regulatory policy of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing, oral argument, or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order(s) as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 3rd day of May 2005.

Reece McAlister
Executive Secretary

5-12-05
DATE

Angela Elizabeth Speir
Chairman

5/12/05
DATE

Attachment "8"

RECEIVED

AUG 30 2005

EXECUTIVE SECRETARY

G.P.S.C.

SEP 16

COMMISSIONERS:
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STAN WISE

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Docket 19553-U:

In Re: Implementation of Senate Bill 147, the Family Violence Shelter Confidentiality Act of 2004 (O.C.G.A. § 46-5-7)

DOCKET # 19553

DOCUMENT # 85446

AMENDATORY ORDER

On May 13, 2005, the Georgia Public Service Commission ("Commission") issued an order in the above-styled docket that, *inter alia*, set forth the minimum requirements for plans "to protect the confidentiality of the address or location of family violence shelters, as defined in Code Section 19-13-20, in this state." O.C.G.A. § 46-5-7(a). Paragraph B. of the Minimum Requirements was entitled "Special Handling of Shelter Customers-Designated Representatives" and stated as follows:

> Once a customer has been identified as a shelter customer (through either of the means described in section I. A above) the customer is assigned to a specially trained, designated service representative. This representative will contact the shelter to verify its status as a shelter.

(Order, p. 3).

At its August 16, 2005, Administrative Session, the Commission adopted Staff's recommendation to modify the May 13, 2005 Order to delete from the Minimum Requirements the last sentence of Paragraph B. Accordingly, the Minimum Requirements no longer require the designated service representative to contact the shelter to verify its status as a shelter.

* * * * *

WHEREFORE IT IS ORDERED, that the Commission's May 13, 2005 Order in the above-styled docket is hereby amended to delete from Paragraph B. of the Minimum Requirements the following sentence: "This representative will contact the shelter to verify its status as a shelter."

ORDERED FURTHER, that all findings, conclusions and decisions contained within the preceding sections of this Order are adopted as findings of fact, conclusions of law, and decisions of regulatory policy of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing, oral argument, or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order(s) as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 16th day of August 2005.

Reece McAlister
Executive Secretary

8/26/05
DATE

Angela Elizabeth Speir
Chairman

8/29/05
DATE

Attachment "C"

MEMORANDUM

DATE: May 1, 2007

TO: All Competitive Local Exchange Companies (CLECs)
All Resellers of Interexchange Telecommunications Services
All Interexchange Carriers
All Payphone Service Providers
All Institutional Telecommunications Service Providers

FROM: Telecommunications Staff, Utilities Division

IN RE: Requirements for Implementation of Senate Bill 147, the Family Violence Shelter Confidentiality Act of 2004 (O.C.G.A. § 46-5-7)

At its September 21, 2004 Administrative Session, the Georgia Public Service Commission ("Commission") initiated this docket for the implementation of the 2004 Family Violence Shelter Confidentiality Act of 2004 ("Act"), O.C.G.A. § 46-5-7.

The Act requires all telephone companies and directory listing providers to file plans with the Commission setting forth in detail how the companies will protect the confidentiality of the location and address of family violence shelters in the state. Under the Act, these plans should describe the manner in which providers will identify family violence shelters in the state and keep confidential the location and address of such shelters.

The following is a brief outline of the minimum requirements ordered by the Commission. For more detailed information, please review the May 12 and August 30, 2005 orders in Docket No. 19553-U. The Orders can be viewed or downloaded via the Commission's website under Docket No. 19553-U, document numbers 82508 and 85446.

- Identification of Shelters- Georgia Department of Human Resources is responsible for posting a current, accurate, updated list of family violence shelters on a quarterly basis. An employee or employees of the company should be responsible for obtaining the periodically updated list of approved "family violence shelters" on the designated date for list update and check this list against their own records to confirm that all the current approved "family violence shelter" accounts are properly marked and protected.

- Telephone Provider's Service Customers should be asked questions to elicit information for the purpose of determining the nature of the customer's business.
- Designated Employees should be trained to handle shelter calls.
- For Directory Publishing, all new listings should be checked against Official Lists prior to electronic or paper preparation in order to suppress address information.
- For Directory Assistance/Operator services, service orders for shelter customers should contain a code indicating that the address should not be listed. When no address is listed, the operator provides only the phone number.
- Telephone providers should address attempts to determine the physical location or physical address of a shelter by limiting access to such accounts to designated employees, appropriate training of personnel and restricting all shelter accounts from outbound sales efforts, whether via telephone, direct mail, internet or otherwise.)
- Requirements upon Discovery of Disclosure of shelter physical location information: notify the Georgia Commission on Family Violence by telephone within 24 hours, provide written notice to the Georgia Public Service Commission no later than 7 days, and notify the shelter by telephone as soon as possible but no later than 24 hours.

The law requires that a plan should be filed every 24 months. **Please sign and return the attached Affidavit for compliance.**

Any questions regarding this matter should be directed to Tonika Starks at 404-657-4990 or tstarks@psc.state.ga.us.