

April 21, 2020

**VIA EMAIL ONLY**

Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, NJ 08625-0350  
board.secretary@bpu.nj.gov  
aida.camacho@bpu.nj.gov

**Re: *In the Matter of the Verified Petition of AT&T Corp. for Waiver of Call Center Rule N.J.A.C. 14:3-5.2 (a)(1) During COVID-19 Public Health Emergency***

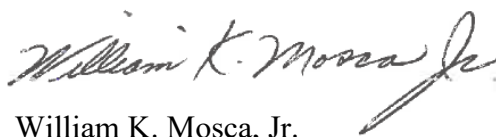
Dear Secretary Camacho-Welch:

On behalf of AT&T Corp. ("AT&T"), enclosed please find an electronic copy of the Verified Petition referenced above, which requests that the Board suspend enforcement of N.J.A.C. 14:3-5.2(a)(1) to permit AT&T to maintain reduced call center hours during the current public health emergency.

Consistent with the Board's Order dated March 19, 2020, in Docket No. EO20030254 temporarily waiving certain requirements for non-essential obligations, we submit these documents via electronic filing only and without the requisite filing fee. We will submit the \$25.00 filing fee when the Board advises that it is ready to accept such payments again.

Please contact me if you have any questions regarding this petition.

Respectfully submitted,

  
William K. Mosca, Jr.

Enclosures

Cc: Service List

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE REQUEST FOR  
WAIVER OF CALL CENTER RULE  
N.J.A.C. 14:3-5.2 (a)(1) BY AT&T CORP.  
DURING COVID-19 PUBLIC HEALTH  
EMERGENCY

**VERIFIED PETITION**

BPU Docket No. \_\_\_\_\_

AT&T Corp. (“AT&T”), by its attorneys, Bevan, Mosca & Giuditta, P.C., respectfully requests the New Jersey Board of Public Utilities (“Board”) to grant a waiver of certain of its call center operating rules as they apply to AT&T *nunc pro tunc*. In support of this Petition, AT&T states as follows:

**I. Background**

1. AT&T currently serves its residential customers in New Jersey (Local and Long Distance) with two call center locations: Sacramento, California; and Manilla, in the Philippines. Until quite recently, AT&T had workers available to handle customer calls twenty-four hours per day, seven days per week (“24 by 7”).

2. As a consequence of the COVID-19 pandemic, and in order to protect the health, safety and welfare of its workers, AT&T has been compelled to adjust the call center hours at both locations.

3. As a result of these necessary measures, these two call centers are now operational from 8:00 am EDT until 8:00 pm EDT on weekdays, and from 9:00 am EDT until 6:00 pm EDT on Saturday and Sunday. Historically, customers call most often during these hours. By way of example, AT&T’s February 2020 call traffic report for these centers revealed that customers made only eighteen calls to these centers outside of the current working hours.

4. AT&T is advising customers who call these centers outside of the current working hours (via the customer support 800 number) of the temporary change to the hours when customers can reach a live agent to report a service issue. In cases where AT&T has been unable to complete service orders due to any apparent health or safety risk associated with COVID-19 (as perceived by the technician dispatched to the scene), AT&T is advising the affected customers that those service orders are postponed until the emergency has diminished. This practice is consistent with the Board's March 19 Emergency Order governing in-home visits.

5. Under N.J.A.C. 14:3-5.2 (a)(1), every public utility is required to make itself available to customers by maintaining "A toll free emergency telephone number at which a customer service representative can be reached quickly at any time of day or night, seven days per week."

6. As stated above, until the COVID-19 outbreak, AT&T maintained 24 by 7 call center service between these two locations to answer calls from its New Jersey Local and Long Distance customers. And when the crisis ends, AT&T will resume its 24 by 7 operations.

7. In light of the COVID-19 crisis, AT&T requests that the Board suspend enforcement of N.J.A.C. 14:3-5.2(a)(1) *nunc pro tunc* as of March 23, 2020 to permit AT&T to maintain the reduced call center hours described above during this public health emergency.

## **II. The Board May Waive Its Rules for Good Cause**

8. The Board may suspend application of any provision of Chapter 14 for periods of emergency or for other extraordinary events beyond the control of a utility, pursuant to N.J. Admin. Code § 14:10-1A.8. This Petition sets forth the grounds required to support the requested relief.

9. Governor Murphy has declared a state of emergency in New Jersey relating to the COVID-19 pandemic, and that state of emergency remains in effect currently. The Governor's

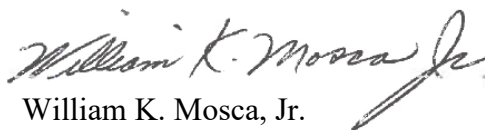
Executive Order 103 expressly grants the Board authority to waive, suspend, or modify any existing rule during the emergency.

**III. AT&T Requests that the Board Suspend Enforcement of N.J.A.C. 14:3-5.2(a)(1) to Permit AT&T to Maintain Reduced Call Center Hours During Public Health Emergency**

10. The Board should grant AT&T's Petition for the reasons set forth above. The requested relief will not inconvenience very many customers, and every customer with a service issue will have that issue addressed by a live operator during normal business hours. The emergency relief requested will be of a temporary nature, as AT&T intends to return to full 24 by 7 coverage when it is safe, reasonable and practical to do so consistent with the national and state emergencies, with full consideration given to the health, safety and welfare of its employees.

**WHEREFORE**, for the foregoing reasons, AT&T respectfully requests this Board to grant the requested relief as set forth above.

Respectfully submitted,



William K. Mosca, Jr.  
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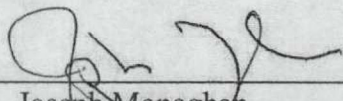
Date: April 21, 2020

cc: Abe Silverman  
Christine Sadovy  
Carole Artale  
Lawanda Gilbert  
Harold Bond  
Stefanie Brand  
Pamela Owen, DAG

**VERIFICATION**

STATE OF NEW JERSEY           :  
  :  
  :  
COUNTY OF MORRIS            :  
  :

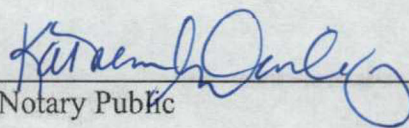
I, Joseph Monaghan, state that I am Assistant Vice President - Senior Legal Counsel at AT&T Services, Inc.; that I am authorized to make this Verification on behalf of AT&T Corp.; and that the statements in the foregoing document are true and correct to the best of my knowledge, information, and belief.



\_\_\_\_\_  
Name: Joseph Monaghan  
Title: Assistant Vice President - Senior Legal Counsel  
AT&T Services, Inc.

SWORN TO AND SUBSCRIBED before me  
this 21<sup>st</sup> day of April, 2020.  
This notarial act was performed using communication technology.

**KATHERINE M. DAILEY**  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 12/7/2022

  
\_\_\_\_\_  
Notary Public

In the Matter of the Verified Petition of AT&T Corp. for Waiver of Call Center Rule N.J.A.C.  
14:3-5.2 (a)(1) During COVID-19 Public Health Emergency

BPU Docket No. \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I certify that on this 21st day of April, 2020, on behalf of AT&T Corp. (“AT&T”), I caused AT&T’s Verified Petition to be served electronically on the following individuals:

**NJ Board of Public Utilities**

P.O. Box 350  
Trenton, NJ 08625-0350

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**Division of Rate Counsel**

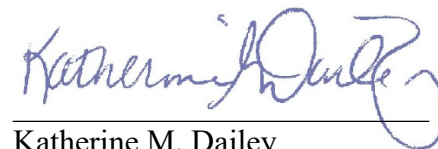
140 East Front Street, 4th Floor  
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Katherine M. Dailey