

**BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION**

In re:	)	
	)	
Implementation of 2005 ALA. ACTS 110, the	)	Docket No. 29878
Communications Reform Act of 2005,	)	
ALA. CODE § 37-2A-14(j) (1975 as amended)	)	

PLAN FOR CONFIDENTIALITY
OF FAMILY VIOLENCE SHELTER LOCATIONS

_____ (Insert Name of Company) (hereinafter, "Company") hereby files the following Plan for Confidentiality of Family Violence Shelter locations in compliance with ALA. CODE § 37-2A-4(j) (1975 as amended):

Domestic Violence Policy

The purpose of this policy is to protect the confidentiality of the physical location or physical address of "family violence shelters". A "family violence shelter" is a facility that provides services or shelter to adult victims of family violence and their accompanying children.

A. IDENTIFICATION OF SHELTERS:

1. CERTIFIED "FAMILY VIOLENCE SHELTERS"

Company will utilize a list of the shelters maintained by the Alabama Coalition Against Domestic Violence (ACADV). ACADV "Family Violence Shelters" must be members in good standing with the ACADV. The ACADV updates its currently existing list of member shelters as changes are made in membership and will contact Company and the Alabama Public Service Commission ("Commission") with updates regarding shelters operating in Alabama. The ACADV list is posted at <http://www.acadv.org/shelterlist.html>.

2. SHELTER SELF-IDENTIFICATION

In addition to use of the Certified Family Violence Shelters List, Company relies on self-identification by shelters. Assurance that certified family violence shelter physical location information confidentiality is maintained is enhanced by shelter-self identification. In such instance, Company is dependent on the subscriber to provide such information at the time the account is established. Company will provide non-ACADV sanctioned shelters identifying themselves as domestic violence shelters with contact information for the ACADV.

B. SPECIAL HANDLING OF SHELTER CUSTOMERS

1. SHELTER VERIFICATION AND SUPPRESSION

Company will conduct a shelter data base verification in accordance with the procedure prescribed in A.1. on a quarterly basis. Company will use this information to

designate all certified family violence shelter physical location information confidential and not for publication or dissemination. The confidentiality of the physical location of certified shelters will be accomplished by means of coding this information such that it is suppressed and not accessible except by that employee(s) trained and authorized to have access to said information.

This designation will include directory publishing, directory assistance, operator services and service account records. This designation shall not apply to the telephone numbers for shelters (i.e., crisis line numbers) or the mailing address (i.e., Post Office Box) when different from the physical location address. An employee(s) will be designated and trained for the purpose of this function.

2. SHELTER PLAN IMPLEMENTATION

In the event Company determines that a certified family violence shelter is not in the certificated service area of Company, those aspects of the Plan related to service orders, installation and repair and other functions related to the physical location of a customer will not be applicable. Nevertheless, Company will continue to run the verification test as prescribed above. In the event it is determined that a shelter has been certified in the Company's certificated service area, this will trigger the implementation of those aspects of the Plan applicable to a company with same.

Concurrently, Company will also determine via the verification test if a certified family violence shelter is located in an exchange(s) for which the Company provides directory listings, directory assistance and/or operator services. If it is determined that a shelter has been certified in an exchange for which the Company provides these services, it will trigger the implementation of those aspects of the Plan related to these functions.

C. DIRECTORY PUBLISHING/DIRECTORY ASSISTANCE/OPERATOR SERVICES

Company will use a data designation designed to help ensure the suppression of the physical location information for all certified shelters. This will include all data provided for the purpose of service orders, directory publication, directory assistance, operator services and the provision of directory listing data to other telecommunications companies.

Company will utilize the information derived from the ACADV database to help ensure that the physical location information suppression procedure described above is accurately implemented. The suppression of the physical location information for all certified family violence shelters will be applicable for all forms of directory information, operator services, online directory services and service records that Company offers and has control over.

While it is the intent of this procedure to ensure that the suppressed data is not available to these entities, Company will also notify any outside directory publication or operator service company of the requirements of the Communications Reform Act of 2005. Company undertakes no responsibility for the actions of these entities or other third parties and, in addition to such limitations which may be set out in Company's tariff, Company shall not be liable for any damages caused to these entities or other third parties either directly or indirectly, resulting from the disclosure of customer information, incorrect calls, blocked calls, fraudulent calls, unauthorized calls or technical difficulties.

D. EMPLOYEE ACCESS TO CONFIDENTIAL INFORMATION

Company will designate an employee(s) who will be responsible for the implementation of this Plan and will provide contact information for such designated individual(s) to the Commission, which will then be submitted to the ACADV. To the extent an employee(s) is designated as responsible for any aspect of this Plan, they will be trained with respect to the confidentiality of information related to the physical location of certified family violence shelters, including instructions 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. Said designated employee(s) will also be trained with respect to awareness of related issues and sensitivity. Only those employees specifically designated and trained will be authorized to have access to information regarding the physical location of these shelters. The employee(s) so designated should be the same employee(s) referenced in B.1. and who will perform the functions prescribed in A.1. Company will provide all updates to contact information for these designated employees in the same manner that it provides initial contact information to the Commission.

E. BUSINESS OFFICE AND CUSTOMER CONTACT PROCEDURES

1. BUSINESS OFFICE PROCEDURES

The data suppression procedure is designed to ensure that non-designated employees do not have access to the physical location information for certified family violence shelters. In the event an employee in the business office, installation and repair, directory listing, operator services or other area of the company encounters a suppression designation, they will have been trained to immediately contact the employee in the company designated to be responsible for the implementation of the Plan.

2. CUSTOMER CONTACT PROCEDURES

Certified shelter accounts will be suppressed from all outbound sales efforts, whether via telephone, direct mail, internet or otherwise. Without limitation, all such accounts will be suppressed from any customer list available for dissemination to any third party.

F. PROCEDURES UPON DISCOVERY OF DISCLOSURE.

If, despite the procedures set forth in this Plan, Company discovers that there is a disclosure, in any form, of the physical location or address of a certified family violence shelter, Company will:

1. Notify the shelter by telephone as soon as possible, but not later than twenty-four (24) hours after such discovery;
2. Notify the Alabama Coalition on Domestic Violence by telephone as soon as possible, but not later than twenty-four (24) hours after such discovery; and
3. Provide written notice to the Alabama Public Service Commission no later than seven (7) working days after such discovery.

This document reflects those procedures in place as of the date reflected herein and is subject to change by Company without further notice. The procedures outlined herein are subject to applicable federal and state laws and regulations, as well as applicable tariffs. In addition to such limitations which may be set out in Company's tariff, Company shall not be liable for any damages caused to subscribers either directly or indirectly, resulting from the disclosure of customer information, incorrect calls, blocked calls, fraudulent calls, unauthorized calls or technical difficulties.

Respectfully submitted this _____ day of _____, 2_____.

COMPANY

As Its: