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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF HILDA GEER  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NOs. 930330-TP & 960658-TP  
SEPTEMBER 17, 1996

Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH" OR "THE COMPANY").

A. My name is Hilda Geer. I am employed by BellSouth as Director - Consumer Market Management-South Florida. My business address is 600 N.W. 79th Avenue, Miami, Florida.

Q. DID YOU FILE DIRECT TESTIMONY IN THIS DOCKET ?

A. Yes, I did.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS DOCKET ?

A. The purpose of my testimony is to rebut portions of direct testimony filed in this case by Sandra Seay on behalf of the Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., hereinafter referred to

1 as "petitioners", in their joint complaints filed May 24, 1996 and June  
2 11, 1996.

3

4 Q. IN HER TESTIMONY, DOES MS. SEAY GIVE AN ACCURATE  
5 INTERPRETATION OF THE COMPANY'S PRACTICES ?

6

7 A. No. As stated in my direct testimony, the Company's practices offer a  
8 balanced communication to inform Florida consumers of the  
9 alternatives available to them for intraLATA toll services. The  
10 information is presented in a fair, just and nondiscriminatory manner.  
11 Service representatives fairly and effectively communicate the  
12 availability of a number of intraLATA service providers, including  
13 BellSouth, to customers.

14

15 Q. MS. SEAY'S TESTIMONY ON PAGE 5, LINES 1 THROUGH LINE 9,  
16 ALLEGES THAT "BELLSOUTH PLANS TO USE EACH ENCOUNTER  
17 WITH CUSTOMERS AS AN OPPORTUNITY TO MARKET ITS  
18 INTRALATA SERVICES." DOES THIS STATEMENT ACCURATELY  
19 REFLECT BELLSOUTH'S PLANNED PRACTICES ?

20

21 A. This allegation is simply incorrect. The Company's current and planned  
22 practices do not call for intraLATA toll services to be discussed on each  
23 and every encounter with a customer. The Company only initiates  
24 discussion of intraLATA toll services on related contacts such as new  
25 connects and requests for additional lines. The Company does not

1 attempt to sell toll services on such contacts as repair, ordering  
2 additional custom calling features or other calls of a general nature,  
3 unless the customer initiates the discussion. Although the Company  
4 does not proactively discuss its intraLATA services on such call types  
5 today, it should not be prohibited from doing so in the future as  
6 competition evolves.

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8 Q. PAGE 11 OF MS. SEAY'S TESTIMONY SUGGESTS  
9 MODIFICATIONS TO BELL SOUTH'S EXISTING SCRIPTS RELATED  
10 TO INTRALATA TOLL SERVICES. SPECIFICALLY, THE  
11 ADVERSARIES SUGGEST THE FOLLOWING: "MR. / MS.  
12 CUSTOMER, DUE TO RECENT CHANGES IN THE COMPETITIVE  
13 AREA/ENVIRONMENT, YOU NOW NEED TO CHOOSE A CARRIER  
14 TO CARRY LONG DISTANCE CALLS YOU MAKE OUTSIDE OF THE  
15 BASIC LOCAL CALLING AREA." MS. SEAY THEN ASSERTS THAT  
16 "THIS IS AN ACCURATE, CLEAR DESCRIPTION OF THE CHOICE  
17 BEFORE THE CUSTOMER." DO YOU AGREE ? IF NOT, WHY  
18 NOT ?

19

20 A.. No, I do not agree. The proposed modifications by Ms. Seay either  
21 inadvertently or intentionally blur the jurisdictional boundary between  
22 intra and interLATA services. Ms. Seay's suggested text leads the  
23 consumer into believing he/she has only one choice for all calls outside  
24 of the customers basic local calling area. The result of the suggested  
25 language is to mislead the customer into thinking they have only one

1 choice for both inter and intraLATA services. The Commission should  
2 recognize this tactic for what it is and should dismiss the petitioner's  
3 suggestion. The Commission should note that BellSouth's current  
4 disclosure statements make no attempt to mislead the consumer by  
5 blurring the jurisdictional boundaries of inter and intraLATA toll  
6 services. As previously stated, the Company's disclosure statements  
7 facilitate a balanced exchange of communication that educates and  
8 informs the consuming public of the alternatives available.

9  
10 Q. ON PAGES 15 AND 16 OF HER TESTIMONY, MS. SEAY ASSERTS  
11 THAT THE COMPANY ENCOURAGES THE SERVICE  
12 REPRESENTATIVES TO "PERSUADE THE CUSTOMER TO  
13 CHANGE HIS MIND" AND SELECT BELLSOUTH AS HIS  
14 INTRALATA PROVIDER. WOULD YOU PLEASE COMMENT ON  
15 THIS INTERPRETATION OF THE COMPANY'S PRACTICES ?

16  
17 A. Yes. Again, Ms. Seay's interpretation misses the mark. The intent of  
18 the script is to prevent the representative from making disparaging  
19 remarks in an attempt to "compare" BellSouth to its competitors. This  
20 is accomplished when the script prompts the service representative to  
21 engage in a "positive" exchange of dialogue, something Ms. Seay fails  
22 to point out. When discussion is initiated by the customer, the script  
23 guides the service representative through an exchange of  
24 communication that simply reminds the customer that BellSouth  
25 remains a full service provider. In no way do these disclosure

1 statements encourage the Company's personnel to attempt to influence  
2 a customer's initial selection of a carrier or reject a customer's decision.  
3 Such behavior would leave the customer with the impression that the  
4 Company is insensitive to their needs and difficult to do business with,  
5 an impression that no company wants to make in a competitive  
6 environment.

7  
8 Q. MS. SEAY STATES ON PAGE 15 OF HER TESTIMONY THAT THE  
9 PURPOSE OF THE COMPANY IS TO ATTEMPT TO POSITION  
10 ITSELF AS A "CONSULTANT" TO THE CUSTOMER, IS TO  
11 "CONVINCE THE CUSTOMER TO USE BELLSOUTH'S INTRALATA  
12 SERVICE." IS THIS THE INTENT ? IF NOT, WOULD YOU PLEASE  
13 COMMENT ?

14  
15 A. No, it is not the intent. BellSouth directs its representatives to act as  
16 "consultants" in order to meet the needs of consumers. Consultants  
17 are sensitive to the needs of their clients or customers. This mindset  
18 and work ethic of "being sensitive to the customers needs " is exactly  
19 what the Company is attempting to instill in its employees with the  
20 guiding principles. When consumers call BellSouth and initiate  
21 discussion relative to intraLATA toll services, the representative, in his  
22 or her consulting role, answers questions, provides information and  
23 attempts to educate the consumer during a balanced exchange of  
24 communication on the myriad of alternatives available. Only through

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1 this type of behavior can BellSouth and its employees portray the  
2 image of a consumer focused entity that is easy to do business with.

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4 Q. ON PAGE 18, LINES 4 THROUGH 15, MS. SEAY COMMENTS ON  
5 BELLSOUTH'S BUSINESS OFFICE PRACTICES AS THEY RELATE  
6 TO CUSTOMER REQUESTS FOR A CHANGE IN CARRIER AND  
7 THE RESULTING PRESUBSCRIPTION (PIC) CHANGE  
8 CHARGES. ARE MS. SEAY'S COMMENTS ACCURATE?

9

10 A. With one exception, they are not. It is true, as stated on lines 7 through  
11 9, that many customers are accustomed to calling their local telephone  
12 company to make a change in their interLATA carrier. Although not  
13 expressed herein, it is therefore also true that these same customers  
14 are accustomed to having BellSouth provide them with their new  
15 carrier's 800 number and requesting that they call their new carrier  
16 directly to accomplish the transaction. The benefits of this transaction  
17 are numerous and have been explained in my prefiled direct testimony.  
18 In addition, for the years that this process has been in effect for  
19 interLATA PIC changes, I am not aware of any problems or any  
20 complaints lodged by the carriers or end user customers. I can only  
21 assume that the process has worked well for interLATA PIC changes  
22 and will work equally well for intraLATA changes.

23

24 Ms. Seay's allegations on lines 4 through 7 that this procedure is an  
25 impediment to the customer's exercise of his right to change carriers,

1 that it is not a customer friendly approach, and that it is anticompetitive,  
2 are simply untrue. As I stated earlier, the benefits of this process are  
3 numerous and have been explained in my prefiled direct testimony. To  
4 maintain a list of 800 numbers, provide the customer with his new  
5 carrier's 800 number, and ask that he contact that new carrier directly  
6 to set up a new account, can hardly be categorized as impeding his  
7 ability to make a change, anticompetitive or as an unfriendly customer  
8 approach. To the contrary, this approach allows the customer to deal  
9 directly with his newly chosen carrier to set up an account and  
10 determine which of that carrier's full range of services best meets his  
11 needs. Absent this procedure, and if the customer fails to eventually  
12 contact the carrier, the carrier must contact the customer to set up the  
13 new account. This may involve one of those infamous "dinner time"  
14 calls in order to catch the customer, not a customer friendly approach  
15 at all.

16  
17 Ms. Seay's statement on lines 9 and 10 that "BellSouth does this  
18 routinely and charges MCI, AT&T, Worldcom and other carriers a fee to  
19 do so" is totally inaccurate. Any and all PIC changes accomplished  
20 through BellSouth's business offices are charged to the end user  
21 customer of record associated with the line being changed. It is only  
22 when the carrier is making the PIC change request on behalf of the  
23 customer through the Customer Account Record Exchange (CARE)  
24 system that the carrier has the option of paying the PIC change charge  
25 in lieu of the customer. This is yet another reason why it is important

1 for the customer to deal directly with his new carrier. Carrier  
2 promotions may indicate that the carrier will pay all costs associated  
3 with changing to them. However, if the customer inadvertently calls  
4 BellSouth to request the change and BellSouth is forced to implement  
5 the change through it's business office, the customer, as opposed to  
6 the carrier, will be billed the PIC change charge. This will most  
7 definitely confuse and inconvenience the customer.

8  
9 Q. THE PETITIONERS ALLEGE THAT BELLSOUTH ENJOYS A  
10 "GATEWAY" STATUS, MEANING ALL CUSTOMERS "MUST COME  
11 THROUGH BELLSOUTH" IN ORDER TO BE MADE AWARE OF  
12 THEIR INTRALATA SERVICES. THEY FURTHER ALLEGE THAT  
13 THIS UNFAIRLY ADVANTAGES BELLSOUTH. HOW DO YOU  
14 RESPOND TO THESE ALLEGATIONS?

15  
16 A. For a number of reasons the petitioners allegations are without merit.  
17 First of all, as described in my prefled direct testimony, the BellSouth's  
18 "on-line documentation" system provides the guiding principles for the  
19 disclosure of competitive alternative information to the customer.  
20 Applications of these directives through use of the illustrative prompts  
21 and suggested phrases ensures the presentation of competitive  
22 information in a fair, just and nondiscriminatory manner. In addition,  
23 the joint complainants are not infant entrants into the  
24 telecommunications industry. These are multi-billion dollar  
25 telecommunications providers with enormous advertising resources



1 who now also benefit from being allowed into the local exchange and  
2 intraLATA toll service arenas (i.e...full service providers). Today, they  
3 spend millions of dollars nationally advertising their products and  
4 services through every media medium available. They reach millions of  
5 readers, television viewers and radio listeners each day with their  
6 campaigns. Their assertion that they should be given what I call an  
7 "infant preference" is unfounded. BellSouth strives to be responsive to  
8 consumers who call its business offices, and it should continue to do  
9 so, particularly given its carrier of last resort obligations.

10

11 Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

12

13 A. Yes. The petitioners allege that BellSouth's current business office  
14 practices are anti-competitive. It is my testimony that BellSouth's  
15 practices and procedures are just and reasonable, offering a balanced  
16 presentation of the alternatives available to Florida consumers. I have  
17 demonstrated that BellSouth's procedures are not anti-competitive and  
18 do not inhibit the development of intraLATA competition.

19

20 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

21

22 A. Yes.

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