## ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application to Provide ) Interexchange Telecommunications ) Service by KTNT Communications, ) Inc., d/b/a I Don't Care and ) d/b/a It Doesn't Matter. ) DOCKET NO.: 97(\_09-TI FILED: February 13, 1998

KTNT COMMUNICATIONS, INC. D/B/A I DON'T CARE AND D/B/A IT DOESN'T MATTER'S TESTIMONY OF DENNIS DEES

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DOCUMENT NUMBER-DATE 02225 FEB 13 # FPSC-RECORDS/REPORTING Q. Please state your name, business address and job title.

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A. My name is Dennis Dees; my business addless is 621
 Ruth Drive, Kennedale, Texas 76060. I am employed by
 KTNT Communications, Inc. as President.

6 Q. What are your present duties with KTNT?

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7 Α. I oversee the day to day operations of KTNT and design 8 the network for how calls will be routed through KTNT. 9 What is the purpose of your testimony in this docket? Q. 10 Α. The purpose of my testimony is to present evidence to support the financial, technical and managerial 11 abilities of KTNT to provide telecommunications 12 service in Florida. We have already filed with the 13 14 Commission a complete application that contains the requisite information, schedules, financial statements 15 and other proof of managerial, technical, and 16 financial fitness. 17

18 Q. Please describe the corporate structure and nature of 19 KTNT's business?

A. KTNT will be using the assumed names of I Don't Care
 and It Doesn't Matter. We are a switchless reseller
 whose primary business activity has been as an
 operator service provider. KTNT will be expanding
 into other areas of telecommunications such as one
 plus and 800-888 numbers as time permits.

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FPSC-RECORDS/REPORTING

1 Q. Has KTNT registered to do business i Florida?

A. Yes. KTNT is a Texas corporation admitted to do
business in Florida. The d/b/a's I Don't Care and It
Doesn't Matter have also been registered and approved
by the Secretary of State of Florida.

6 Q. How long has KTNT been in business and what are the 7 financial, managerial and technical abilities of KINT? KTNT started business in Texas in February of 1995. 8 Α. 9 The assumed names I Don't Care and It Doesn't Matter 10 have been in operation, in Texas, since September of 11 1995. KTNT expanded into Michigan and Ohio in April 12 of 1997 using the assumed names.

13 Q. Does KTNT have the resources to expand into Florida 14 and other states?

15 A. Yes.

16 Q. Is the management of KTNT competent to run this 17 business?

18 A. Yes. The management of KTNT has already proven its
 ability by the success of KTNT and the fact that KTNT
 20 continues to expand throughout the country.

21 Since KTNT is a reseller, it has entered into 22 contracts with underlying carriers. They handle most 23 of the technical side of our business. The switch, 24 T1's, and operator centers are all leased facilities. 25 Even though KTNT has a firm understanding of the

1		technical side, it obviously does not need to manage
2		in detail this side of the business.
3	Q.	Where is KTNT currently certified?
4	Α.	Illinois, Michigan, New Jersey, Ohio, Texas and
5		Wisconsin.
6	Q.	Has KTNT been denied certification in any state?
7	A.	No.
8	Q.	In what states does KTNT operate?
9	Α.	Illinois, Michigan, Ohio and Texas.
10	Q.	Please describe the services KTNT proposes to offer.
11	Α.	Initially, KTNT will be providing operator assisted
12		calling such as collect calls, person to person, third
13		party, and calling card calls. Eventually, as our
14		business grows we will expand into other areas such as
15		one plus and 800-888 numbers.
16	Q.	Will KTNT own any network switches or transmission
17		facilities?
18	Α.	No. KTNT operates as a switchless reseller, and as
19		such, resells the switching and transmission services
20		of its underlying providers.
21	Q.	How will KTNT bill for its services?
22	Α.	KTNT has contracted with ZPDI of San Antonio, Texas to
23		handle all of its billing for the State of Florida.
24		ZPDI already handles all of KTNT's billing in the
25		states it does business in now.

- Q. How will billing inquiries and/or customer complaints
   be handled?
- A. All customer inquiries will be handled on behalf of
  KTNT by ZPDI. Customers will be directed to make
  their inquiries by dialing an 800 number which will be
  included in the billing. If ZPDI for some reason is
  unable to satisfy the customer then the customer will
  be given KTNT's 800 number and we will handle the
  complaint.
- 10 Q. Will KTNT comply with Commission rules, orders, and 11 policies pertaining to the reselling of intrastate 12 telecommunications services?
- 13 A. Yes.
- 14 Q. How will the people of Florida benefit from KTNT's15 services and presence in Florida?
- The public interest is served by creating greater 16 Α. 17 competition in the reselling of intrastate telecommunications services. KTNT anticipates that 18 19 its proposed services will increase consumer choice. Why does KTNT use the assumed names I Don't Care and 20 Q. 21 It Doesn't Matter?

A. KTNT believes these names are attention grabbers which
 will enable us to get consumers to know who we are
 faster than other companies. With the advent of the
 Telecommunications Act of 1996, the age of competition

has arrived. Companies need to be more creative, and we feel that some consumers will relate to these names because they have a "sense of humor" to them instead of the usual approaches to long distance names. We believe that some of these consumers will think our approach is innovative which will result in customers for KTNT.

8 Q. Does KTNT intend to telemarket its services with these9 unusual names?

KTNT will not use telemarketing means to gain 10 Α. customers with the names I Don't Care and It Doesn't 11 12 Matter. We believe that consumers are tired of the 13 tactics of many long distance companies who engage in 14 telemarketing. We believe in the right of these 15 companies to use this approach but from a marketing angle we feel it is the wrong approach. Generally 16 17 speaking, we believe that people are tired of the calls at home during dinner hours or during anytime of 18 day. Consumers may hear from many different companies 19 soliciting over the telephone in a given year and some 20 21 of the same companies many times during the course of 22 a year. It gets to the point where some consumers get 23 tired of the calls and have an attitude of "I don't care" or "it doesn't matter" or "they're all the 24 same." When they hear about our company's names they 25

1 might laugh and say "that is clever I might look into 2 using them for my long distance service. The point 3 is that consumers ought to have a choice whether or not they want to do business with KTNT or someone 4 5 else. We believe that many consumers truly do not б care who their long distance carrier is and if that is 7 their attitude, then maybe we will be an attractive 8 choice.

9 Q. How will KTNT promote the names I Don't Care and It 10 Doesn't Matter?

11 Α. The names can be promoted by direct mail, newspaper 12 advertising, radio commercials, billboards and most 13 importantly by word of mouth. Eventually, KTNT would 14 like to air television commercials. We have discussed 15 several different ideas for television commercials. 16 One approach we like is a take-off on the Abbot & 17 Costello routine "Who's on first?" We would use the 18 same approach with I Don't Care and It Doesn't Matter, 19 to highlight that some consumers really do not care as 20 long as it is the same old big companies. KTNT 21 believes the public would respond favorably to such an 22 advertising campaign. It would bring some fun to this 23 industry instead of the same old commercials where the 24 big three constantly pound on each other. KTNT ought 25 to be rewarded for its clever marketing approach and

let the public decide whether or not they want to
 choose us as a carrier.

Even though we believe a good number of Florida 3 consumers already know who we are, it takes time for 4 5 the general public to hear about any company, not just 6 KTNT, because a company must first go through a 7 certification process before the consumer has even had 8 a chance to know who they are. In other words, 9 certification must come first and then promoting who you are by clever strategies comes second. 10

Q. How many complaints has KTNT had regarding the names
 I Don't Care and It Doesn't Matter?

13 A. To our knowledge we have never had a complaint filed 14 against KTNT regarding the names I Don't Care and It 15 Doesn't Matter with the FCC, any of the State PUC's 16 where we do business or any other agency where a 17 consumer may file a complaint.

18 Q. Does this conclude your testimony?

19 A. Yes it does.

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## CERTIFICATE OF SERVICE

Docket No. 970109-TI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery\* or U.S. Mail this 13th day of February 1998, to the following:

Martha Brown\* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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aueno for k K. /Wiggins

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