State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

MARCH 16, 2000

TO:

DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM:

DIVISION OF COMMUNICATIONS (KING, MCDONALD, MOSES, TUDOR)

DIVISION OF APPEALS (BROWN) NO

RE:

DOCKET NO. 960598-TP - REQUEST FOR SUBMISSION OF PROPOSAL FOR PROVISION OF RELAY SERVICE, BEGINNING IN JUNE 1997, THE HEARING AND SPEECH IMPAIRED, AND OTHER IMPLEMENTATION MATTERS IN COMPLIANCE WITH THE FLORIDA

TELECOMMUNICATIONS ACCESS SYSTEM ACT OF 1991.

AGENDA:

03/28/00 - REGULAR AGENDA - INTERESTED PERSONS MAY

PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: PLEASE PLACE NEAR THE BEGINNING OF THE AGENDA OR SCHEDULE A TIME CERTAIN TO REDUCE

INTERPRETER COSTS.

FILE NAME AND LOCATION: S:\PSC\CMU\WP\960598L.RCM

CASE BACKGROUND

The Telecommunications Access System Act of 1991 (TASA), Section 427.701, et. seq., Florida Statutes, directed the Commission to establish a statewide telecommunications relay system, beginning June 1, 1992. TASA required the development of a statewide relay service that could be certified by the Federal Communications Commission (FCC) under the provisions of the Americans with Disabilities Act. MCI Telecommunications Corporation (MCI) has been Florida's Relay provider since the system was established. Most recently, MCI has provided relay service pursuant to a contract for service from June 1, 1997, through May 31, 2000. The current contract between MCI and the Commission is based on a Request for Proposals the Commission

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issued in August of 1996 and awarded to MCI in December of 1996 with service beginning June 1, 1997.

The current contract for relay service includes a section that provides for liquidated damages for failure to perform the obligations required by the contract. That section states, in pertinent part:

Liquidated damages shall accrue in amounts up to the following amounts per day of violation:

(a) For failure to meet answer time, blockage rate or transmission level requirement - \$5,000.

Any liquidated damages may be paid by means of the Administrator deducting the amount of the liquidated damage from a monthly payment to the provider. Such action shall only occur upon order of the FPSC.

It is clear from MCI's monthly reports to the Commission, and from staff's tests of the relay system, that MCI has failed to satisfactorily perform its obligations under the Relay contract (Attachment A). Staff informed MCI of this in a letter to MCI dated May 13, 1998 (Attachment B). In the letter, staff raised its concerns about MCI's failure to meet the contract standards for answer time and blockages and asked why MCI should not be required to show why liquidated damages applicable under the contract should not be assessed. Since that time, MCI's service under the contract has not appreciably improved. MCI has failed to meet the answer time objective on 154 days and blockage objectives on 45 days for the period from June 1, 1998, through December 31, 1999 (Attachment C). As a result, the citizens of Florida have not received the service for which the Commission contracted, and the following recommendation to collect liquidated damages is appropriate.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission collect liquidated damages from MCI in the amount of \$770,000 for failure to meet the answer time requirements of its contract, and \$225,000 for failure to meet the

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blockage requirements, from June 1, 1998, through December 31, 1999?

RECOMMENDATION: Yes. The Commission should require MCI to pay liquidated damages by crediting the Florida Telecommunications Relay Inc. (FTRI) account \$770,000 for failure to meet the answer time requirements of the contract, and \$225,000 for failure to meet the blockage standard, for a total of \$995,000. The liquidated damages should be credited to relay bills beginning with the FTRI bill for March, 2000. (McDonald)

STAFF ANALYSIS: The answer time requirement, as outlined in the RFP that forms the basis of the current contract, and agreed to by MCI, requires that the provider answer 90% of all calls each day within 10 seconds of reaching the relay switch. The blockage rate provision in the contract requires that 99% of all calls reaching the relay center each day must either be answered or continue to receive a ringing signal (resulting in a maximum blockage rate of 1%).

MCI's contract requires a monthly report to the Commission on the daily percentage of calls answered and the daily percentage of calls blocked (Attachment D).

Staff made an extensive review of the data MCI provided from October, 1997, through March, 1998. That data shows that MCI missed the blockage requirement 45 days and answer time requirement 62 days respectively, out of a total of 182 days. That poor performance prompted staff's May 13, 1998, letter.

MCI took action to improve its performance by replacing the FRS subcontractor (D.E.A.F.) with Vista Information Technologies on June 4, 1998. During the changeover period, from June through July, 1998, service deteriorated further; MCI missed the answer time requirement 59 days and the blockage requirement 43 days out of 61 total days. Service improved thereafter, however, and from August through December, 1998, MCI missed the answer time requirement 25 days and the blockage requirement 2 days out of 151 total days. (2 days were excluded for hurricane Georges.) Because it appeared that MCI was trying to improve its service quality and having some success at it, staff decided not to pursue liquidated damages at that time.

Since 1999, however, MCI's service quality has been very erratic, and it has recently taken a definite turn for the worse. During the first three months of 1999, MCI missed the answer time

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requirement 23 out of 90 days. From April through July, 1999, MCI missed only 2 days, but from August through December MCI missed 49 days out of 150, with 3 days excluded for hurricanes. It is evident that the service has deteriorated again and it is staff's opinion that MCI has not made a significant effort to alleviate the problems.

FRS is often the only means by which the hearing and speech impaired citizens can communicate by telephone. TASA requires that the hearing and speech impaired community should receive telecommunications service comparable to the level of service that a hearing person receives. A hearing person only has to receive dial tone in order to place a call to another hearing person, and the telecommunications providers generally provide dial tone service in under 2 seconds. Dial tone to a hearing impaired person equates to a Communications Assistant answering his/her call and being ready to provide relay service for the caller. However, since human intervention is required, answering the caller within 10 seconds 90% of the time is as close to comparable service as is currently reasonable.

MCI's contract to provide these services extends from June 1, 1997 through May 31, 2000. For the twelve month period of June 1, 1997, through May, 1998, MCI missed the answer time requirement on 103 days and the blockage requirement on 66 days. Over the 19 months since MCI replaced its subcontractor in June of 1998, MCI has missed the answer time requirement 154 days and the blockage requirement 45 days from June 1998 through December 1999. Adjustments in the number of days that the objectives were missed were made to account for the days that were affected by hurricanes Georges, Floyd, and Irene.

Staff acknowledges that MCI replaced its subcontractor in 1998 in an effort to improve service, but MCI still has not met the service quality standards in the contract. Therefore, staff recommends that the Commission invoke the liquidated damages provision of the contract and collect damages in the aggregate amount of \$995,000 for the period since the new subcontractor has been in operation, June, 1998 through December 1999.

ISSUE 2: Should this docket be closed?

RECOMMENDATION: No. (Brown)

STAFF ANALYSIS: Docket 960598-TP should remain open for the duration of the contract with MCI.

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN

J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF TELECOMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

Public Service Commission

January 6, 2000

Ms. Alana Beal FRS Program Manager TRS Miami Center 200 South Biscayne Boulevard, Suite 600 Miami, FL 33131-5310

Re: FRS Evaluation-December

Dear Ms. Beal:

Enclosed is a copy of the service evaluation for the Florida Relay Service for December. The completion rate was 88.0%, answer time was 89.3% and the average feedback was 12.1 seconds.

Please provide your comments to us by Jan. 24, 2000 concerning any items that didn't meet the objectives.

Sincerely,

Mexiconal

Don McDonald

U.S./Communications Eng-Supr

Enclosure

cc: Advisory Committee (List Attached)

Richard Tudor, Rick Moses, Clayton Lewis

Kim Wobschall, Bill McClelland, Charles Estes

George Houck, Tom O'Neill

James Ward, Beverlee DeMello, Robby Cunningham, Ruth McHargue

FLORIDA TELECOMMUNICATIONS RELAY SYSTEM

..SUMMARY REPORT OF TEST CALLS BY FPSC

December 1999

TDD TO TELEPHONE		TELEPHO	NE TO TDD		TOTALS
Number of calls	98	Number of	calls	93	191
Busy (Fast)	0	Busy (Fast)		0	0
Busy (Station)	0	Busy (Statio	on)	0	0
RNA/Failed	14	RNA/Failed	RNA/Failed		23
Call Successfully Completed	84	Call Succes	Call Successfully Completed		168
Answered over 20 sec.	12	Answered o	Answered over 20 sec.		18
Garbled Messages	0	Garbled Me	essage s	0	
Not Courteous	0	Not Courte	Not Courteous		0
Average Feedback (sec.)	12.1				
SUMMARY	ACTUAL	OBJ	MET		
Total Calls	191				
Busy & Failures	23				
%Completion	88.0%	97.0%	N		
Answered	168				
Ans W/I 20 Sec	150				
% Ans W/I 20 Sec	89.3%	90.0%	N		
Garbled Messages	0				
Not Courteous	0				
Average Feedback (sec.)	12.1	10.0	N		

MCI WORLDCOM

Global Relay Miami Center 200 South Biscayne Boulevard Suite 600 Miami, FL 33131

January 24, 2000

Mr. Don McDonald U.S./Communications Engineer Supervisor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 RECEIVED
JAN 26 2000
CMU

Dear Mr. McDonald:

This is in response to your letter of January 6, 2000 regarding December 1999 evaluation result.

In December, Florida Relay Service staffing reports reflect higher than normal voluntary and involuntary terminations among Communication Assistants, which resulted in inadequate staffing during high volume periods. This is one factor that contributed to falling short of performance specifications.

Evaluation logs show several test calls logged as failures, with remarks column indicating "nothing". These test calls were counted as completion failures. However, there is no indication to whether the call received a ring back or it whether it was a high and dry call. This information is important in order to determine the cause of failure.

Performance data from the FRS switch show the center operating optimally at the same time the test logs indicate call failures.

For example, on the first sheet by "C. Lewis" calling TDD to Telephone from Kissimee, a failure is logged at 9:21 on 12-22-99, marked as "RNA" with a note that the evaluator hung up after "2 min 30 sec". An examination of the FRS Delayed Call Profile shows 191 calls arriving at the switch between 9:00 and 9:30, all were answered within 26 seconds with 10 calls abandoned within 26 seconds during this time block. No abandoned calls were logged at 2 minutes, 30 seconds (90 to 180 seconds column).

If this test call had reached MCIWC facilities as logged, the call would have shown up in the "under 180 seconds" column. It must be assumed that this call did not reach the FRS center.

The next failure on the same sheet shows "other fail" at 8:01 on 12-23-99. FRS data shows 155 calls arriving at the center during the 8:00 to 8:30 time block with all being answered within 26 seconds. The same time block shows 13 calls abandoned, again all within 26 seconds or less.

Other time blocks wherein evaluation logs show failure to meet specifications are:

12/6 7:30-8am
1-1:30pm
1-30-2pm
152 calls were answered within 2 seconds, 0 abandons
1:30-2pm
146 calls were answered within 2 seconds, 0 abandons

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12/8 9-9:30am 3-3:30pm 4-4:30pm	187 calls were answered within 26 seconds, I abandoned at 10 seconds 149 calls were answered within 2 seconds, 0 abandons 174 calls were answered within 6 seconds, 0 abandons
12/9 9:30-10am	178 calls were answered within 16 seconds, 2 abandons at 10 seconds
12/10 1-1:30pm	259 calls were answered within seconds, 0 abandons
12/17 10:30-11am	259 calls were answered within 6 seconds, 0 abandons
12/18 3-3:30pm	141 calls were answered within 10 seconds, 0 abandons
12/20 8:30-9am	163 calls were answered within 26 seconds, 14 abandons within 26 seconds
12/21 1-1:30pm	172 call was answered within 26 seconds with one call being held in queue between 90 and 180 seconds, 8 abandons within 26 seconds
12/22 9-9:30am 1-1:30pm	191 calls were answered within 26 seconds, 10 abandons within 26 seconds. 186 calls were answered within 26 seconds with one call held in queue between 90 and 180 seconds, 8 abandons at 26 seconds
12/23 8-8:30am	155 calls were answered within 26 seconds, 13 abandons within 26 seconds
12/27 10-10:30am 1-1:30pm	146 calls were answered within 26 seconds, 0 abandons 132 calls were answered within 2 seconds, 0 abandons
12/28 9-9:30am	100 calls were answered within 26 seconds with one call held in queue between 90 and 180 seconds, 6 abandons at 26 seconds
2:30-3pm	90 calls were answered within 10 seconds, 0 abandons
12/30 11-11:30pm 1-1:30pm	142 calls were answered within 26 seconds, 0 abandons 132 calls were answered within 2 seconds, 0 abandons

If you have any questions or need additional information, please feel free to contact me at 305-372-7201.

Sincerely yours

Alana Beal

FRS Program Manager

STATE OF FLORIDA

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JOE GARCIA
E. LEON JACOBS, JR.



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

Public Service Commission

May 13, 1998

Mr. Charles Estes SR. TRS Outreach/Education/Marketing Mgr MCI 2400 N. Glenville Drive Richardson, TX 75082

Re: Provision of Florida Relay Services by MCI

Dear Mr. Estes:

We have reviewed MCI's monthly reports and are concerned about the results. From October 1997 through March 1998, MCI's report shows that the blockage objective was missed 45 days and answer time was missed 62 days respectively out of 182 days (see attached chart). The FPSC's monthly test calls reveal that MCI missed the completion objective 5 out of the 6 months and answer time was missed one month. In addition, MCI has exceeded the average feedback time of 10 seconds every month.

The frequency of missed objectives seems excessive to us, moreover, it is not readily apparent that MCI has taken steps to satisfactorily address these service quality problem areas. Under the circumstances, please respond by June 2, 1998 as to why MCI should not be required to show cause why penalties applicable under the contract should not be assessed.

Sincerely,

J. Alan Taylor, Chief

Bureau of Service Evaluation

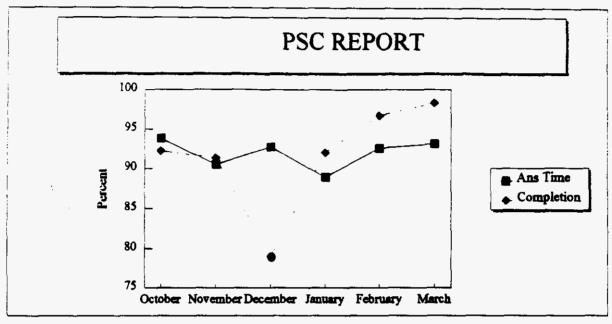
Enclosure

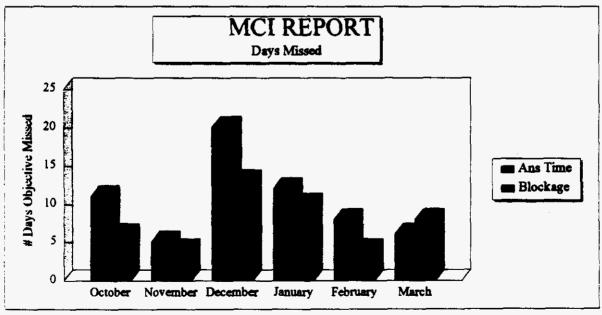
cc:

Richard Tudor

Don McDonald Laura King 9

PSC REPORT			MCI REPORT				
				Days Mis	sed		
	90%	97%		<90%	>1%		
	Ans Time	Completion		Ans Time	Blockage		
October	93.8	92.2	October	11	- 6		
November	90.5	91.3	November	5	4		
December	92.7	79.0	December	20	13		
January	88.9	92.0	January	12	10		
February	92.6	96.7	February	8	4		
March	93.1	98.3	March	6	8		







MCI Telecommunications Corporation

TRS Miami Center 200 South Biscayne Boulevard Suite 500 Miami, FL 33131-5310 305 372 7212 (Voice) 305 372 7229 (TTY)

RECEIVED

3 1 1995

CMU

July 29, 1998

Mr. Alan Taylor, Chief Bureau of Service Evaluation Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Dear Mr. Taylor:

This is in response to your May 13, 1998 letter regarding performance of Florida Relay Service. We apologize for the delay in our response, but as I explained to you during our phone conference, we did not receive your letter until you resent it after our last phone conference.

MCI shares your concern with respect to the level of performance and has taken extraordinary steps to improve the performance. First, MCI has replaced the FRS subcontractor with Vista Information Technologies, Inc. MCI has been impressed with Vista's commitment to ensure adequate staffing levels and its willingness to agree unconditionally to meet the contractual performance requirements. While Vista maintained the majority of the competent CAs, it has replaced the management group that was responsible for the day to day oversight and performance of the center. The new management staff is both competent and committed to providing the highest quality relay service possible. Second, MCI has removed from FRS management the party responsible for day to day oversight and performance of the center.

Although the performance levels as of this date have not yet returned to the expected levels due to erosion of CA staffing over the past several months and into the transition period, the third wave of newly recruited and trained CAs are currently being placed online. This effort has all occurred since the June 4th changeover in subcontractors and clearly demonstrates an aggressive effort on the part of Vista to bring CA staffing up to the numbers necessary to satisfy contract specifications. Unfortunately, reports on CA staffing provided to MCI up to the June 4th changeover did not reflect actual staffing levels and the extent to which the CA staff that had dropped at FRS. This hampered Vista's initial staffing efforts.

MCI also wishes to mention certain other factors that contributed to the performance levels noted in your letter. First, in an effort to provide a more suitable relay center, MCI

engaged in renovations over a several month period. Unfortunately, as is inevitable with such renovations of facilities that need to operate on a 24 x 7 basis, there were some instances of electrical interruptions or failures that brought down the entire center such as those previously reported as occurring on October 3rd and December 8th. At other times, there were partial center outages. There were also instances of damage to sensitive system components that were difficult to pinpoint and determine the cause for failure. With the completion of construction and renovation earlier this year, the center is not experiencing additional outages.

There also is the fact that end user re-dialing contributes to an artificial reading of performance indicators. For example, a caller receiving a busy signal is likely to immediately re-dial until a ring is noted. Such practice, while perfectly legitimate on the part of the end user, artificially inflates the actual blockage rates. MCI is confident that current efforts being made to increase staffing will effect a change toward satisfactory performance.

As for the matter of feedback time, please note that the May and June test results were within the standard. MCI believes that the CA re-training and focus on the initial feedback requirement have delivered the desired result.

MCI would like to have the opportunity to schedule a meeting to discuss monthly data and test call results and update you and your staff on MCI plans for the immediate future. If you have questions or require additional information of any nature, please do not hesitate to give me a call.

Sincerely yours,

Charles C. Estes

Interim FRS Program Manager

Carles C Et



TRS Miami Center
200 South Biscayne Boulevard
Suite 500
Miami, FL 33131-5310
305 372 7212 (Voice)
305 372 7229 (TTY)

RECEIVED

CMU

August 27, 1998

Mr. Richard N. Tudor, Assistant Director Florida Public Service Commission Division of Communication Capital Circle Office Center 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Dear Mr. Tudor:

This is to follow up on my letter of August 11, 1998 regarding the status of Florida Relay Service and efforts to restore FRS performance to satisfactory levels.

As previously mentioned, starting August 1, MCI has maintained the Tempe, AZ TRS center in operation to take part of FRS call volume. The Tempe TRS center will be used on a month to month basis while recruitment and training efforts in Miami re-build CA staffing to the level necessary to handle FRS call volume.

Since August 1, FRS has answered 90% or more of the incoming calls within 10 seconds with the exception of Saturday, August 2 with 89.9% in 10 seconds. This date will be rounded to 90% on the August report. Three other days, August 3 (84.3%), August 10 (86.3%) and August 17 (83.4%) were short of 90% within 10 seconds. Note that these three days are all Mondays, which present the greatest staffing challenge.

As of this week, a total of 40 CAs have been trained and placed on line. Between the Miami and Tempe TRS centers, there are 271 CAs handling FRS traffic which is the approximate target number Vista has set for staffing the Miami center.

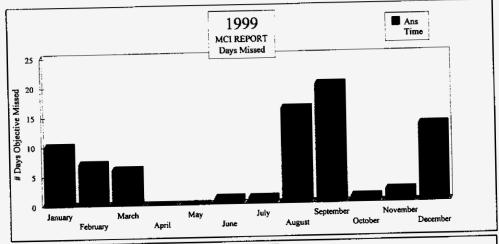
MCI also needs to bring to a close all outstanding issues with the previous subcontractor, DEAF, Inc. Before MCI finally and completely releases DEAF, Inc. from the previous teaming relationship, MCI needs to hear from you that from your present perspective, the new FRS subcontractor, Vista, is a viable replacement, that you and your staff believe that the efforts being made by MCI and Vista to restore service performance levels are on target and that FRS is moving forward with a clean slate.

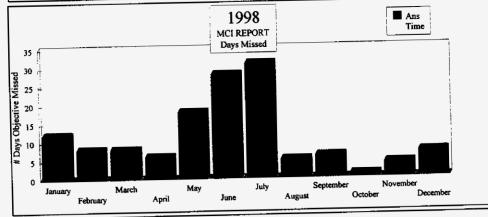
Additionally, as a matter of information, MCI is presently interviewing candidates for the Program Manager position of FRS and expects to be able to share with you the new appointment within a short time.

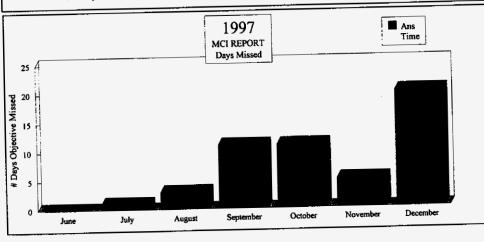
Sincerely yours.

Charles C. Estes

FRS Interim Manager



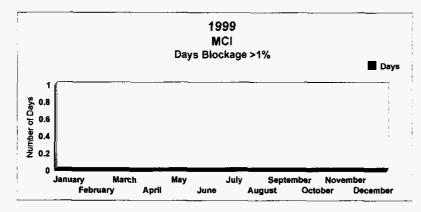


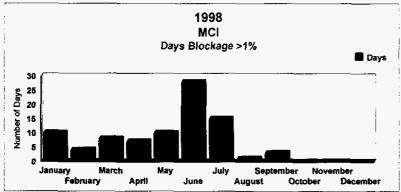


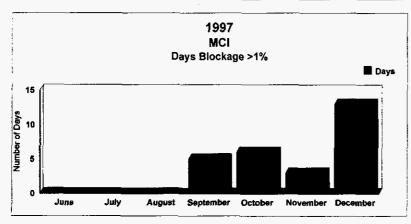
January February March April May June July August September October November December TOTALS 1997 June July August September October November November	12		83%
June July August September October	8 8 6 18 28 31 5 6 1 4 7	84. 86. 81. 52. 61. 85 2 77 82. 84	88% 00% 10% 30% 5.7% 6.66% 4.7% 7.0% 0.09% 7.6%
December TOTALS GRAND TOTAL ADJUSTED DAMAGES/DAY	0 1 3 11	88 79 73 8	N/A 5.00% 8.33% 9.09% 5.82% 1.80% 9.30%

TOTAL DAMAGES \$1,285,000

HURRICANE GEORGE 9/98. FLOYD 9/99, & IRENE 10/99







	Days Blockage				
	>1%				
1999	> 170	Del/Storm			
	0				
January Estates	0				
February	0				
March	0				
April	-				
May	0 0				
June	0				
July	0				
August	0				
September	•				
October	0				
November	=				
December	0 0	0			
TOTALS	U	0			
1009					
1998	10				
January	10				
February	4				
March	8 7				
April	10				
May					
June	28 15				
July	1				
August	3	2			
September	ა 0	2			
October	0				
November	0				
December TOTALS	86	2			
TOTALS	00	2			
1997					
June	0				
July	Ö				
August	0				
September	5				
October	6				
November	3				
December	13				
TOTALS	27	0			
TOTALS	21	J			
GRAND TOTAL	113	2			
ADJUSTED	111	Days Missed			
DAMAGES/DAY	\$5,000				
-/ 1140 (OEO/D/)	Ψ0,000				
TOTAL DAMAGES					
TOTAL DAMAGES	\$555,000				

MCI

HURRICANE GEORGE 9/98

FLORIDA RELAY SERVICE

MONTHLY REPORT

DECEMBER 1999

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FLORIDA RELAY SERVICE DECEMBER 1999

STAFFING

During the month of December, FRS staffing reports show a total of 196 active Communication Assistants online. Four new Communication Assistants positions were offered. FRS subcontractor, Vista, conducted one training class during the month of December and graduated three new Communication Assistants to production by the end of the month.

PERFORMANCE

In December, FRS experienced severe attrition of the CA staff with approximately 30 Communication Assistants either voluntary or involuntary terminated. This has resulted in missing of performance specifications on several days. Inadequate staffing during certain periods of the day where the volume was above projection has also contributed to performance deficiencies.

OUTREACH

In December, MCI WorldCom hosted a Community Forum in Pensacola, Florida with approximately 40 people in attendance. Many questions were raised and answered regarding policies and procedures, and Relay etiquette. After meeting with community leaders, four additional presentations have been arranged for April 2000 in Pensacola. A tour of the Relay Center was given to a group of five Gallaudet University students who visited Miami.

CALL VOLUME

The FRS Center handled 224,125 outgoing calls in December 1999. The 73.20% of these calls were TTY originated, while 16.16% were voice originated. Likewise, 7.97% were TTY terminating while 90.77% were voice terminating.

ASA / BLOCKAGE

December-99

Time	NCO	NCH	ASA	Rejects	% Blocked	Longest	Shortest	<u>%10sec</u>
12/01/99	7513	7446	1	0	0	180	0	94
12/02/99	7100	6983	3	0	0	180	0	90
12/03/99	6867	6826	1	0	0	180	0	96
12/04/99	4911	4874	1	0	O ·	180	0	95
12/05/99	4786	4767	0	0	0	180	0	99
12/06/99	8304	8229	2	0	0	180	0	92
12/07/99	7216	7131	2	0	0	180	0	91
12/08/99	8156	8076	2	0	0	180	0	92
12/09/99	8156	8076	2	0	0	180	0	92
12/10/99	7802	7581	5	0	0	180	0	80
12/11/99	7369	7270	2	0	0	180	0	91
12/12/99	4950	4802	3	0	0	180	0	90
12/13/99	4550	4498	2	0	0	180	0	94
12/14/99	8010	7883	3	0	0	180	0	90
12/15/99	6895	6724	4	0	. 0	180	0	83.
12/16/99	7241	7150	2	0	0	180	0	91
12/17/99	7351	7213	4	0	0	180	0	85
12/18/99	7185	6981	4	0	0	180	0	84
12/19/99	5468	5279	4	0	0	180	0	86
12/20/99	4794	4450	7	0	0	180	0 7.	78
12/21/99	7757	7568	4	0	0	180	0	82
12/22/99	6529	6314	7	0	0	180	0	77
12/23/99	6442	6384	2	0	0	180	0	94
12/24/99	6185	6008	4	0	0	180	0	84
12/25/99	5290	5194	2	0	0	180	0	94
12/26/99	4079	3769	5	0	0	180	0	83
12/27/99	4149	3963	4	0	0	180	0	86
12/28/99	6543	6471	2	0	0	180	0	91
12/29/99	6418	6356	2	0	0	180	0	94
12/30/99	6071	5954	3	0	0	180	0	87 80
12/31/99	5822	5629	, 3	0	0	180	0	89