ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause proceedings against GTE Florida Incorporated for violation of service standards

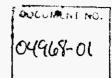
Docket 991376-TL

REBUTTAL TESTIMONY

OF

JOHN A. FERRELL

APRIL 20, 2001



Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.

A. My name is John A. Ferrell. My business address is One Tampa City

Center, 201 North Franklin Street, Tampa, Florida 33601. My title is

President of Verizon Florida Incorporated ("Verizon," formerly known as GTE Florida Incorporated).

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Q. PLEASE DESCRIBE YOUR EDUCATION AND WORK HISTORY.

I am a graduate of the University of Redlands, Redlands, California, with a B.A. in Business Management and an M.B.A. I have worked in the telecommunications industry since 1972, when I began as a central office technician at Continental Telephone Company (later Contel) in Corcoran, California. From 1976 to 1989, I held a number of management positions at Contel of California, including local manager, Traffic Analyst, Superintendent-Network Services, District Manager-Network Services, and Manager-Network Access. I then served a twoyear assignment as Director of Engineering and Planning for Contel of Indiana in Seymour, Indiana. In 1991, I returned to Contel of California as Director of Customer Services and later Vice-President of Customer Services for Contel's California, Nevada, and Arizona operations. After Contel and GTE merged, I served 10 months as General Manager-Network Reliability for GTE California in Thousand Oaks, California. In 1997, I became Director of Remote Operations Support in Irving, Texas. In November 1998, I was promoted to my current position as President of Verizon Florida Inc...

1 Q. WHAT ARE YOUR RESPONSIBILITIES AS PRESIDENT OF VERIZON FLORIDA?

I am responsible for the overall management of Verizon Florida's wireline telecommunications operations. I have direct oversight of field maintenance and construction. I also lead the Verizon Florida Regional Customer Services Team, which comprises managers of all other sales and support departments associated with the delivery of customer service in our Florida Region. I am responsible for management of all service indices and associated operating budgets, including capital and expense for those departments reporting directly to me. I also serve in our community as a member of numerous education and economic development boards, as well as in other capacities.

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14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS 15 PROCEEDING?

I will discuss Verizon Florida's emphasis on providing quality service and its continuing focus on meeting the Commission's repair and installation standards at issue in this docket. I will explain the actions I have taken to achieve ongoing compliance with these standards, and place the Company's past service results in the proper perspective. In particular, I will refute the conclusions drawn by Office of Public Counsel (OPC) witness, R. Earl Poucher, in his Direct Testimony. I will also respond to the Direct Testimony of Commission Staff witness, Donald B. McDonald.

Two other witnesses will testify on Verizon's behalf. Russell B. Diamond, Verizon's Business Analysis Manager-Florida Region, will discuss in detail Mr. Poucher's allegations concerning outside plant and the budget process. John Appel, who was President of GTE Network Services immediately before he retired, will respond to Mr. Poucher's allegations concerning budget and other GTE Headquarters directives.

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Q. IS VERIZON FLORIDA PROVIDING QUALITY SERVICE?

Yes. As I will discuss in more detail below, Verizon Florida provides quality service by any measure. As the attached Exhibit JAF-1 shows, Verizon has had the top Commission repair and installation scores among the large incumbent local exchange carriers ("ILECs") virtually every month since fourth quarter of 1999, from a total-company Under my leadership, the Company has sustained perspective. compliance with the installation and repair standards for almost all exchanges for the past 15 months. Verizon Florida is achieving these results despite the fact that Florida has some of the toughest service standards in the nation, and despite the Commission's exchangespecific reporting requirement. Even when the Company has been unable to meet the installation and repair standards at certain points in some exchanges, its results still demonstrate a high level of customer service. In 1998 and 1999, Verizon Florida repaired out of service conditions in 24 hours almost 93% of the time. It completed primary service installations within 3 days 87% of the time in 1999 and almost 96% of the time in 1998. In most states, these results would have exceeded the Commission's service quality standards. I would submit that the ultimate conclusion—that Verizon provides quality service—should be no different here.

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6 Q. PLEASE DESCRIBE THE STANDARDS THAT ARE AT ISSUE IN 7 THIS DOCKET.

This case involves two standards on which Verizon is required to report to the Commission. The first requires clearing of out-of-service conditions within 24 hours in at least 95% of the cases. (Rule 25-4.070(3).) The second requires at least 90% of requests for installation of primary service to be satisfied within three working days. (Rule 25-4.066.) Both of these standards are exchange-specific. That is, each standard must be met in every exchange, every month, rather than in the aggregate for Verizon's service territory as a whole.

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Q. CAN THE COMMISSION PENALIZE VERIZON SIMPLY FOR FAILING TO MEET PARTICULAR SERVICE STANDARDS?

No. I am not a lawyer, but a plain reading of Florida Statutes, section 364.285, permits the Commission to assess penalties only after an entity is found to "have refused to comply with or willfully violated any lawful rule or order of the commission." Thus, the Commission will need to analyze each and every service standard miss to determine whether it was willful. According to the dictionary (and, my lawyers tell me, Florida case law), "willful" means "deliberate, voluntary, or

intentional." (Random House College Dictionary, rev. ed. 1975.) If there is no evidence that Verizon refused to comply with the PSC service standards or that it intentionally violated those standards, the Commission cannot lawfully penalize the Company. Verizon cannot be fined simply on the basis of figures showing that it missed particular standards at various times in past years.

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DURING THE PERIOD AT ISSUE IN THIS DOCKET, HAD THE COMMISSION EVER INDICATED THAT VERIZON SHOULD BE FINED FOR WILLFUL VIOLATION OF THE COMMISSION RULES? No, and the Company considers this to be a significant fact. Although the OPC prompted the Commission to investigate Verizon's compliance record since 1996, there was no move during all that time to penalize the Company for non-compliance with any service standards. With every compliance report, Verizon includes explanations for any misses. In 1998, Verizon even responded to a specific Staff inquiry about the Company's 1997 service results. (See letter and sample narratives from 1997 service reports at Ex. JAF-2.) Verizon's reasonable assumption was that the Commission accepted the Company's explanations and understood that any service standard misses were not willful. As a matter of equity and practicality, I believe it is inappropriate to examine events reaching back five years, especially when many of the Company people and documents from

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that long ago are no longer available for Verizon to make its case.

1 Q. YOU MENTIONED THAT THE PSC STANDARDS ARE EXCHANGE-2 SPECIFIC. WHY IS THIS FACT SIGNIFICANT?

A. With exchange-specific measures, if an ILEC misses, for example, as few as three repairs or installations in a small exchange in a given month, it could well fail to meet the corresponding standard for that month. For example, one hundred misses in Tampa look the same in terms of PSC results as one miss in Myakka. Exchange-specific reporting can thus tend to produce an unjustifiably negative impression of a company's service quality, as I believe it has in Verizon's case.

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11 Q. ARE EXCHANGE-SPECIFIC STANDARDS THE NORM AMONG 12 STATE COMMISSIONS?

A. No. Typically, companies are measured on a territory-wide basis. In fact, this Commission's service standards are some of the toughest among the states where Verizon operates. I believe that most Commissions allow 5 days (rather than 3) for installation and require 85-90% (rather than 95%) of repairs to be cleared within 24 hours—again, on a territory-wide basis—if they have any service quality standards at all.

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Q. ARE THERE INDICATORS OF SERVICE QUALITY OTHER THAN EXCHANGE-SPECIFIC STATISTICS?

23 A. Yes. Every year, the Commission Staff performs an annual service 24 quality audit, measuring 75 criteria. Verizon's aggregate score has 25 consistently exceeded the passing grade established by the Commission for the audits. In fact, in 1997 and 1998, Verizon had the highest score of any incumbent local exchange company (ILEC) in Florida. The only year in which Verizon did not achieve a passing grade was 1996, and that miss was due to the answer time standard, rather than the installation and repair measures at issue in this docket.

Customer complaints are also a good measure of service quality because they are based on direct customer input. In this regard, Verizon's service complaints of all types (including filed Commission complaints, FCC complaints, Company Action Line complaints, and executive complaints) decreased significantly from 1997 to 1999. In 1997, Verizon had 11.7 complaints per 100,000 lines. Since 1999, that number has remained at less than 9 complaints per 100,000 lines.

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Q. HAS MR. POUCHER, THE WITNESS FOR THE OFFICE OF PUBLIC COUNSEL, CONSIDERED THESE OTHER INDICATORS IN HIS EVALUATION OF VERIZON'S SERVICE PERFORMANCE?

No. Mr. Poucher ignores complaint statistics and summarily dismisses the Commission's audits as simply means to verify Company procedures and practices. (Poucher Direct Testimony ("DT") at 7.) This is not an accurate description of the service audits. These audits use the same service standards and objectives as those in the Commission rules and Verizon's monthly reports. As Commission witness McDonald explains in his Direct Testimony, the Commission considers the annual service quality evaluations in assessing Verizon's

level of compliance with the service quality rules. If the service audits were not an important part of the Commission's overall evaluation of the ILECs' service quality, it would make no sense for the Commission to do them year after year.

I believe the real reason why Mr. Poucher has chosen not to consider service audits in evaluating Verizon's service quality is that Verizon generally achieved good total scores on these audits, as I discussed above.

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Q. IN GENERAL, WHAT IS YOUR IMPRESSION OF MR. POUCHER'S DIRECT TESTIMONY?

It has no basis in fact. As I have pointed out, the Commission cannot penalize Verizon unless it finds that the Company willfully violated the service standards at issue. As such, from the start of this docket, OPC has advanced the hypothesis that once Verizon elected price regulation in 1996, it undertook a deliberate course of disregarding the Commission's service standards to pursue the single-minded goal of increasing profits.

OPC conducted extensive discovery to try to uncover proof of this kind of willful approach on Verizon's part. When that discovery failed to yield any evidence confirming OPC's hypothesis, OPC did not abandon its theory. Rather, it tried to fit the evidence to the hypothesis. This effort requires Mr. Poucher to draw broad

conclusions based on misinterpretation and mischaracterization of documentary evidence. Even the most cursory examination of Mr. Poucher's testimony reveals that there is no basis for the assumptions OPC has made about Verizon's motivations. My testimony here provides a more careful examination of the evidence, which demonstrates Verizon's continuing emphasis on satisfying the Commission's service standards. While Verizon has, at times, not met the repair and installation standards in limited circumstances, I will explain that there are very good reasons for these misses. Certainly, none of them was willful.

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Q. HAS THERE BEEN SOME RECOGNITION THAT THIS COMMISSION'S SERVICE STANDARDS ARE UNREASONABLE AND SHOULD BE REVISED?

Yes. The industry recognizes a need to provide service in line with the expectations of today's consumers, rather than simply in conformance with standards set decades ago for a monopoly environment for "plain old telephone service." As Mr. Poucher points out, the service standards at issue were adopted in the 1960s. Today's telecommunications marketplace is strikingly different than it was some forty years ago. Back then, for instance, there were no competitive choices for any telecommunications services, vertical services did not exist, and there was no need for high-speed connections. Telephone companies also had no obligation to open their networks to competitors. The service standards have not kept pace with these and

other changes.

In an apparent attempt to ascribe some nefarious motive to Verizon, Mr. Poucher states that Verizon, along with other ILECs, has advocated changes in service standards since 1996. Verizon has never hidden this fact, which is a matter of public record. Verizon will continue to urge revisions in the standards to assure that they are driven by the marketplace and customer satisfaction. This is the only approach that makes sense today. If Verizon does not satisfy its customers, those customers will not buy services from Verizon. So Verizon necessarily has a powerful incentive to provide quality service without the need for external prompting.

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Q. DOES THE COMMISSION ALSO RECOGNIZE THE NEED TO CHANGE THE STANDARDS?

I think so. As far back as 1995, even before the large ILECs had begun to operate under price caps, the Commission had initiated a rulemaking docket to examine potential changes to the service standards. But there was little activity in that docket for an extended period. In 1999, the effort to change the rules was once again taken up in earnest. That process was well underway until the Commission became engaged in these service quality dockets for Verizon and the other large ILECs.

Q. DOES THE FACT THAT THE EXISTING SERVICE STANDARDS

ARE OUTDATED CHANGE VERIZON'S OBLIGATION TO COMPLY 1 WITH THEM? 2 No. As Mr. Appel explains, there is no foundation for Mr. Poucher's 3 Α. claim that the corporate solution was to change the rules, rather than 4 5 to comply with them. 6 MR. POUCHER INDICATES THAT THE COMPANY BALANCES 7 Q. 8 COST AND QUALITY CONCERNS. IS THAT TRUE? 9 Α. Certainly. If that were not the case, the Commission should have 10 serious cause for concern. In a competitive marketplace, every 11 company must remain acutely aware of cost considerations. The trade 12 press in recent years is replete with accounts of telecommunications 13 companies' cost-cutting measures. These firms cannot succeed 14 without paying close attention to their costs of providing service. None 15 of them, including Verizon, can spend an unlimited amount on service 16 quality while ignoring cost. While Verizon could hire legions more 17 technicians to assure that repairs and installations are performed 18 immediately, it wouldn't survive for long if it adopted such an expensive 19 and inefficient strategy. 20 21 It is a constant challenge to provide quality service while controlling 22

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Company's success.

costs, but this is something every telecommunications company faces

every day. Management that can meet this difficult task is critical to a

Both cost and service quality are important to the maintenance of Verizon's network—a network which is also the foundation of Verizon's competitors' ability to provide service through unbundled network elements, interconnection, and resale.

Verizon's careful attention to budget concerns does *not*, however, justify Mr. Poucher's conclusion that "budgetary process was shortcircuiting the company's requirement to meet the PSC objectives." (Poucher DT at 9.) Again, there is no evidence that the Company decided to sacrifice service results for cost controls, or that the business is "managed more toward achievement of earnings goals rather than meeting service obligations." (Poucher DT at 17.) None of the documents Mr. Poucher cites indicates this kind of strategy. Rather, the primary, continuing emphasis at the Florida Company and at Headquarters was not on making more money, but on meeting the Commission's service standards.

Indeed, for all of Mr. Poucher's emphasis on budget, he fails to point out the fact that Verizon ran \$20.5 million over its budget in 1998 and \$7.9 million over in 1999. This is proof that when there is conflict between meeting service standards and budget objectives during particular periods, striving to meet Commission standards takes precedence.

Q. ARE YOU MEETING THE CORPORATE MANDATE TO BRING THE

COMPANY IN LINE WITH PSC SERVICE STANDARDS?

Headquarters management expected rapid results when I signed on as President. It has been very difficult to meet this challenge, but I have been able to make a positive difference here in terms of service indices. Working with a relatively new management team here in Florida, the Company has achieved significant improvement in compliance with Commission standards. The Company's fourth quarter 1999 and 2000 results showed significant improvement, and the trend continues in 2001. While I realize it may be difficult to sustain this record, especially given the seasonally extreme weather here in Florida, my primary emphasis will remain on meeting service standards.

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This emphasis has been a constant here in Florida not just during my tenure, but during the time my predecessor, Peter Daks, served as Florida President. Although Mr. Daks and I may have taken different approaches to improving service results, discovery produced to OPC shows there is no doubt that he also understood that meeting service standards is a critical objective of this job, and that he was constantly striving to improve service results. Exhibit JAF-3 is just a small sample of the scores of discovery documents reflecting Mr. Daks' management team's primary emphasis on meeting Commission standards.

Q. HOW HAVE YOU BEEN ABLE TO SUSTAIN IMPROVED RESULTS?

The ability to improve service results rests on an understanding of the causes of ongoing misses. With 28 years of experience in operations, I was particularly well suited to analyzing these recurring problems so that my management team and I could devise effective solutions. Soon after I began work here, I recognized that a major key to improving repair and installation results in an efficient manner was to reduce both the amount of trouble and the number of repeat repair visits. I concluded that better planning and more careful deployment of capital would further enhance installation results.

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Q. WHAT KINDS OF SPECIFIC THINGS HAVE YOU DONE TO IMPROVE COMPLIANCE WITH PSC STANDARDS?

One of my most important efforts, which is ongoing, was to improve dispatch control and forecasting in order to optimize scheduling of available workforce. Exhibit JAF-4, for example, shows a significant reduction of both service order and repair dispatches from 1998 to 1999. These kinds of results benefited both repair and installation statistics.

In the area of repair, specifically, I took a number of concrete actions to enhance the effectiveness of the Company's Trouble Analysis Center (TAC) Focus program. By way of background, TAC Focus is a corporate-wide preventive maintenance program that has been in place since at least the 1980s. It allows the Company to analyze trouble on a cable-specific basis so that it can efficiently isolate and

prioritize areas for replacement or repair.

In general, I felt that greater centralization and focus was needed in Florida's TAC Focus efforts. To that end, I formed a dedicated team, comprised of hourly and management employees, to be the primary administrators of the TAC program. These employees spend all of their time addressing preventive maintenance. In addition, I implemented service improvement teams, again including both management and hourly employees, to better identify areas in need of preventive maintenance and prioritize service improvement opportunities.

Based on my knowledge of the network and analysis of TAC reports, I identified two areas of particular concern. First, I observed that Verizon's digital line carrier ("DLC") units were causing a disproportionate amount of trouble reports. I implemented a SWAT team approach, focussing on the worst-performing DLC units and effecting necessary repairs to grounding, cables, cards, and the like. Second, I concluded that open plant conditions, which would allow water to seep into the network, were causing an inordinate amount of trouble. I thus implemented an active process and dedicated funding to seal the plant—for instance, by stepping up air pressure maintenance and remedying temporary closures. We got employees involved in this effort by rewarding them for identifying open plant conditions. Third, although the Company had always emphasized proper bonding and grounding, I felt that all technical employees could

benefit from a refresher course, and so required all of them to attend such courses.

Other measures included creating a standards of performance report for all technical employees, coupled with feedback, training, and coaching to improve both quality and efficiency; and increased management visibility from the President to local managers to ensure proper attention to employee concerns and feedback (*see, e.g.*, Ex. JAF-5.) We also adjust staffing on a regular basis, specifically to attain compliance with PSC measures. (*See, e.g.*, Ex. JAF-6.)

Through these measures and many others, Verizon was able to deploy existing funds in a more effective manner. But when I felt additional funds were needed for particular purposes, I aggressively sought and obtained them. For instance, I determined that galvanized steel grounding rods were not performing in some applications as intended, thus exacerbating the effects of lightning on plant. So in mid-1999, the Company switched to a more effective type of grounding rod. These rods are substantially more expensive than the others, but I felt their payoff in terms of service quality would be well worth their price.

Q. WHAT MEASURES DID YOU TAKE TO IMPROVE INSTALLATION RESULTS?

A. My emphasis on giving local teams responsibility and accountability to reduce troubles and non-productive dispatches yielded positive results

for installation results, as well as repairs. Reducing repair trips, and, in particular, repeat dispatches, freed up technicians to perform installations. In addition, we implemented a number of measures to reduce the number of field trips required for installations. For example, we substantially improved our Express Dial Tone (EDT) program and the accuracy of the EDT records, thereby increasing the probability that service can be installed without a premises visit. We proactively worked to preempt problems in exchanges that were not meeting objectives. We also hired more technicians to perform installations, as Mr. Diamond mentions in his Direct Testimony, and have otherwise ensured appropriate staffing through better management of both employees and contractors. (See, e.g., Ex. JAF-7.)

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Q. DID YOU IMPLEMENT ANY OTHER PLANS SPECIFICALLY DIRECTED AT ACHIEVING BETTER SERVICE RESULTS?

Yes. Although I began to implement my efforts to improve service results soon after I came here, these efforts did not yield results immediately. By late summer of 1999, Headquarters believed it was necessary to issue some strong reminders to me about the urgency of bringing results into compliance with PSC standards. One of these is attached to Mr. Appel's Direct Testimony. That communication required the submission of a formal action plan to improve service quality results. The resulting plan (attached as Ex. JAF-8) listed numerous, specific activities to be undertaken, along with an outline of my strategies for long-term success in meeting these requirements.

Q. HAVE THERE BEEN ENHANCEMENTS SINCE THE PLAN WAS IMPLEMENTED?

I took numerous, specific measures to improve service both before and after the plan was submitted. While I've mentioned some of the efforts in the discussion above, it's really impossible to list them all. I have attached a few documents evidencing these efforts, but many more are reflected in the voluminous documents produced to Public Counsel and Staff. Service quality enhancement is an ongoing, evergreen process, and my management team and I continue to refine our strategies on an almost daily basis. In fact, division operations has calls twice a day to try to ensure the most effective possible deployment of manpower for repairs and installations. And I require daily management reports of service results so we can better identify any ongoing problems and level our workloads. (See, e.g., Ex. JAF-9.) Although Mr. Daks had also used daily, exchange-by-exchange reporting, I improved the format to enable management to better view service jeopardies by exchange.

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In general, the principal thrust of my efforts has been to empower local teams to identify service-affecting problems and to more effectively work through established company processes to get these problems resolved.

Q. DOES YOUR SUCCESS IN ACHIEVING IMPROVED RESULTS

1		DISPROVE MR. POUCHER'S THEORY THAT VERIZON'S BUDGET
2		HAS BEEN INADEQUATE?
3 /	A.	Yes. Verizon's improved compliance has not been achieved through
4		budget increases, but rather through more effective utilization of
5		resources and more focussed preventive maintenance plans.
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7		Mr. Poucher apparently believes that throwing money at a problem wi
8		prudently and automatically solve it. The fact that Verizon
9		management does not share this belief does not mean that i
10		disregarded service objectives. But this is just the conclusion that the
11		Commission will have to draw to find Mr. Poucher's allegations to be
12		true and to accept his recommendations. It will have to find that more
13		money automatically equals better service results, that the company
14		willfully disregarded this direct connection, and that it was the cause of
15		each and every missed repair and installation.
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17		As Mr. Diamond explains in more detail in his testimony, the
18		fundamental premise of Mr. Poucher's argument—that more money
19		automatically equals better service quality—is false, so the
20		Commission cannot accept his conclusions that Verizon willfully
21		violated the Commission's service standards.
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23	Q.	IS IT TRUE, AS MR. POUCHER CLAIMS, THAT VERIZON FIRST
24		CONSIDERED MEETING PSC SERVICE STANDARDS TO BE

MANDATORY ONLY AFTER THIS SHOW CAUSE PROCEEDING

WAS INITIATED (POUCHER DT AT 21)?

No. As Mr. Appel explains, Mr. Poucher's allegation rests on a blatant mischaracterization of Mr. Red Keith's August 26, 1999 e-mail seeking submission of a plan to improve service results. (Mr. Keith reported to Mr. Appel at the time.) That communication (attached to Mr. Appel's Direct Testimony) required me to submit to Headquarters a corrective plan by September 2, 1999—before the show cause proceeding was implemented.

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In any event, Mr. Poucher should know his claim is not true, as the primary importance of complying with PSC measures is a continuing theme throughout the documents produced to OPC. I have been at all times aware of the fact that meeting PSC standards is mandatory; Mr. Keith's communication to me just emphasized the urgency of that effort once again.

Moreover, it is wholly implausible that the Florida management team could have immediately implemented changes after initiation of the show cause that would have instantly yielded improved service results. Big organizations like Verizon cannot change procedures or find trained, experienced personnel overnight and there are numerous factors that may affect service results. Determining how the operations should be modified to achieve compliance was not a quick and easy task; rather, it has been something I have worked on continuously since I became President in late 1998. The ongoing efforts of the Florida team

were first clearly demonstrated at about the same time as this docket was initiated. Given the improvements that were already in place and proving effective, it is very unfortunate that this docket was undertaken at all. The resources directed toward this litigation could be much better deployed in maintaining the improved compliance results.

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7 WHAT ARE SOME OF THE FACTORS THAT HAVE MADE IT Q. 8 DIFFICULT FOR VERIZON TO MEET THE COMMISSION 9

OBJECTIVES AT TIMES?

Aside from the inflexible nature of the standards themselves, a factor I have already discussed, there are a number of conditions that make meeting repair and installation standards particularly challenging. Chief among these are the extraordinary levels of rainfall and lightning here and the increasing difficulty of attracting and retaining a quality workforce. Verizon's installation service results have also been affected by reporting and processing problems that arose after a major system conversion in late 1998. I will discuss these factors in turn below.

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Q. PLEASE DESCRIBE THE SERVICE PROBLEMS RELATED TO VERIZON'S SYSTEM CHANGEOVER.

In late summer 1998, Verizon implemented a new automated service order entry management system. This change affected every functional area of the Company, including, among others, the customer contact centers, the Facility Assignment Center ("FAC"), and dispatch

While Verizon believes the system overhaul will be activities. beneficial in the long run, it was difficult to accommodate the system to management at the exchange level, and the changeover created some reporting problems. System shorter-term processing and implementation problems were particularly acute during February through March of 1999. In the months following, it became clear that order coding changes under the new system presented significant problems. Since accurate service order entry is critical to timely and efficient order fulfillment and manpower deployment, these problems led to misses in the installation standards. In some instances, the standard was actually met, but the installation date was incorrectly recorded because of the coding changes. To reiterate, these errors were reflected on Verizon's compliance results as misses even though the work was properly completed on time. Verizon cited this problem in its written explanations of its first quarter 1999 service results. (Ex. JAF-10.)

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The process and training issues associated with the new service order system continued into the third quarter of 1999, so this unique event significantly affected results for the year.

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Q. HOW DOES EXTREME WEATHER AFFECT INSTALLATION AND REPAIR RESULTS?

24 A. The correlation is very simple. Trouble volumes increase substantially—sometimes doubling or tripling—with lightning and heavy

rain. At the same time, our technicians can't perform as many repairs or installations during these periods due to the danger involved. So it often becomes virtually impossible to meet the Commission's strict installation and repair standards at these times.

Mr. Poucher points out that Tampa Bay is the thunderstorm capital of the world (Poucher DT at 13.) He's close—in all the world, only the Amazon River Basin has more annual lightning days than the Tampa area. Rain and lightning are routine, especially in the summer months. (See, e.g., JAF-11.) It is common for Verizon's installation and repair results to dip during the summer, or during other periods of extreme weather. In this regard, the weather phenomenon of El Nino caused severe and unpredictable weather beginning in late fall of 1997. For instance, El Nino caused record rainfall in parts of Verizon's serving area in December of 1997, and in January, February, and March of 1998. I have attached a small number of the documents discussing the severe weather conditions the Company has faced and the difficulty of meeting service standards in the face of these conditions, despite the Company's best efforts. (Ex. JAF-12.)

Because Verizon cannot control the weather, its failure to meet standards because of the weather cannot be deemed willful. It is simply imprudent to staff at all times to levels to meet extreme weather conditions which happen only intermittently.

1	Q.	BUT MR. POUCHER CLAIMS THAT THE WEATHER HAS AN
2		UNDUE IMPACT ON VERIZON BECAUSE THE COMPANY HASN'T
3		SPENT ENOUGH ON PREVENTIVE MAINTENANCE. IS THIS
4		TRUE?

No. Once again, Mr. Poucher bases his allegations on "evidence" that A. does not support his conclusions. Mr. Diamond will discuss the budget 6 and outside plant maintenance in greater detail, but I'd like to make a 7 8 few general observations.

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Mr. Poucher claims that Verizon's problems with lightning are caused largely by its failure to dedicate adequate resources to bonding and grounding. But the only document that purports to support this point is a report showing the company's progress toward the goal of grounding cross-boxes. (Poucher REP-8.) Contrary to Mr. Poucher's opinion, this document does not indicate any refusal by the Company to fund grounding efforts; to the contrary, it is a progress report on grounding efforts. So all that Mr. Poucher's evidence shows is that when the Company discovers a potential source of service problems, it will undertake to correct that problem.

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Indeed, I have been particularly vigilant in addressing bonding and grounding issues, as I explained earlier in my testimony. This is certainly not the course of a Company intent on ignoring service standards.

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1 Q. MR. POUCHER ALSO FOCUSSES ON A COMPANY STATEMENT
2 INDICATING THAT DETERIORATION OF OUTSIDE PLANT NEVER
3 STOPS. (POUCHER DT AT 15.) IS THIS TRUE?

Of course it is. Obviously, the deterioration process starts the moment plant is put into service, so I'm not sure what point Mr. Poucher is trying to make with this statement. Once again, the documentary references he cites do not support his claim that budget constraints are "hurting the maintenance effort at Verizon." To this end, he points to a Verizon presentation explaining work that had been done to date on outside plant problems and detailing the results of a program seeking employee input on identifying unsatisfactory plant conditions. (Poucher Exs. REP-9 and REP-10.) These are reports of efforts in progress; there is no indication that such efforts were to be curtailed or that maintenance projects would not be funded. Once again, these documents only indicate GTE's efforts to take innovative steps to identify and correct problems—not to ignore them.

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A.

Q. CAN YOU DESCRIBE VERIZON'S STAFFING PROBLEMS?

Yes. The Company experienced an unusually high number of employee retirements in late 1998 and early 1999, driven largely by the favorable effects of interest rates on individuals' pensions. With the unemployment rate so low, it has been difficult to attract and retain qualified workers to remedy workforce attrition. In addition, training employees in repair and installation is expensive and time consuming. Even when training is complete, it may take several years before a

technical employee gains the wide range of skills and experience necessary to perform top-notch work in a variety of areas.

The entry of local competitors in recent years has also undermined Verizon's ability to maintain an optimally efficient workforce. Florida is one of the top states in the country in terms of numbers of competitors entering local markets, and Verizon's employees are eagerly sought after by our competitors. Often, Verizon invests time and money in training employees only to have them hired away by competitors.

Other, ongoing staffing challenges exist, as well. I have already noted the effects of severe weather on Florida operations. It is very difficult to predict, let alone to staff to, peaks and valleys in weather-related troubles. In addition, demand for installation tends to be higher at various times—for instance, the beginning of the month, when people typically move. To fill the gaps, Verizon has been forced to make significant use of contractors, who are typically not as efficient as regular employees in general service delivery functions.

Q.

- MR. POUCHER CLAIMS THAT VERIZON'S "COMPETITIVE STRATEGIES" HAVE HARMED THE COMPANY'S ABILITY TO MEET THE PSC'S INSTALLATION AND REPAIR STANDARDS?
- A. No. Mr. Poucher purports to support this allegation with a reference to a statement by former GTE Florida Incorporated President Peter Daks about the need to "exercise cost controls directing our focus on the

extremely competitive markets." (Poucher DT at 20; Mr. Poucher includes no citation to any document.) Mr. Poucher interprets this statement to mean that "in those exchanges where competition was not active and where customers had no competitive choices that they would receive a lesser grade of service." (Poucher DT at 20.)

This is a strikingly broad conclusion to draw from one brief clause in an unnamed document. The fact is, we don't know what, exactly, Mr. Daks may have meant, assuming he made the statement, but it would have been entirely reasonable for him to cite cost controls and focus on extremely competitive markets as key concerns. I do, however, know for a fact that Verizon has never had any program to provide some customers service below Commission standards based on the level of competitive activity in their areas.

Q.

BUT WHAT ABOUT THE HEADQUARTERS PLAN MR. POUCHER CITES TO SELECT AREAS FOR PREFERENTIAL INSTALLATION AND REPAIR SERVICE (POUCHER DT AT 20-21 & REP-21)?

A. The document Mr. Poucher cites as evidence of this plan is not what he claims it is. For a time, Company Headquarters did require the regions to report repair clearing intervals and certain other results according to the level of competitiveness in particular exchanges (*i.e.*, extremely, highly, or moderately competitive). This was a short-lived experiment; the regions no longer report any results in this way. The more important point, however, is that these reports had nothing to do

with Commission service standards and in no way demonstrated any plan to lower standards in certain exchanges. Verizon's business was never managed to these indicators (as is evident from the statistic that businesses in the least competitive areas received faster repair clearing times than those in the most competitive areas).

The reports were used principally to evaluate the viability of investments in new products and services in various areas. In any event, almost all—93%--of Verizon's exchanges fell into the "extremely competitive" category, so this measurement technique had little meaning in Florida.

Q. ISN'T IT TRUE, THOUGH, THAT BUSINESS CUSTOMERS TYPICALLY RECEIVE FASTER REPAIR TIMES THAN RESIDENCE CUSTOMERS?

A. Yes; I believe this is a common industry practice. Telephone service is essential to the operation of most businesses and businesses pay substantially more for local service than residential customers do. It is thus reasonable for businesses to obtain somewhat faster repair responses (although installation intervals are often longer). Business customers' rates are above the costs of providing their service; residential customers' rates, on the other hand, are generally well below their associated costs.

In addition, it is not unreasonable for Verizon to place primary

emphasis on retaining its business customers. These are the most lucrative customers—the ones that provide the contribution essential to keeping residential rates low. Precisely because business customers provide the highest profit margins, most local competitive entry has been in the business sector. Verizon has already lost a significant percentage of these profitable customers to its competitors, which are not obligated to support state universal service goals. Verizon is left to shoulder the entire universal service burden itself, a task which will become virtually impossible as competitors win more and more of the profitable markets like business and intraLATA toll. Under these circumstances, it would be irrational and imprudent for Verizon not to direct significant efforts toward keeping its business customers.

Α.

Q. IS THE JANUARY 1, 1996 START DATE OF THIS INVESTIGATION SIGNIFICANT IN TERMS OF VERIZON'S REPAIR AND INSTALLATION PRACTICES AND POLICIES?

No. Mr. Poucher claims this date is significant for this docket because that's when price regulation began for the large ILECs, including Verizon, in Florida. (Poucher DT at 3-4.) He's correct about the date price regulation began, but his implication that price regulation caused Verizon to disregard the PSC's service standards is wholly unfounded and irresponsible. There is no evidence that GTE reduced its emphasis on service standard compliance as of January 1, 1996. Indeed, price cap regulation had exactly the effect on GTE that it is supposed to—it compelled the Company to operate in the most

prudent and efficient manner practicable.

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Q. WHAT IS YOUR RESPONSE TO THE DIRECT TESTIMONY OF COMMISSION STAFF WITNESS, DONALD B. MCDONALD?

Mr. McDonald's Testimony basically summarizes the compliance reports and service audits from 1996 through 1999. I have no reason to believe his figures are inaccurate. I do, however, take issue with one statement Mr. McDonald makes. He states that the Company's compliance reports, which show an unusual increase in installation misses for 1999, indicate a "degradation of service in the area of installation." The 1999 installation figure should be viewed as an aberration, rather than an indication of a decline in installation service. In particular, as I discussed earlier, the service order entry system changeover experienced throughout much of 1999 seriously affected installation results, producing an unusually high number of reported misses. In addition, both out-of-service and non-out-of-service reports in the summer of 1999 were high, making it necessary to direct available manpower away from installation to repair. 1999 is most properly viewed as a recovery year, with the Company establishing the processes and strategies that would enable it to attain sustained compliance with PSC results in the future. Indeed, results for 2000 and 2001 prove that there is no service degradation trend. In any event, Mr. McDonald does not claim that any of Verizon's misses on the service standards at issue were willful.

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- 1 Q. PLEASE COMMENT ON MR. POUCHER'S RECOMMENDATION
 2 THAT THE COMMISSION FINE VERIZON \$19.3 MILLION IN THIS
 3 CASE.
- A. As I have discussed here, no fine at all is warranted in this case, let alone a fine as ridiculously high as \$19.3 million. To place OPC's recommendation in perspective, recall that the Commission Staff had recommended that the Commission approve Verizon's offer of \$50,000 in settlement of this case. That settlement would likely have been approved, but for OPC's intervention.

As another point of comparison, we can look at the slamming cases that have been before the Commission. Those cases, like this one, usually involve allegations of multiple violations of Commission rules. To my knowledge, no such case has ever gone to hearing. But in settlement agreements, I believe the Commission typically accepts per-occurrence amounts in the range of \$1000 per violation. If the Commission used that standard in this case and determined that all 773 repair and installation misses for the period at issue were willful, the fine would amount to \$773,000—a substantial penalty, to be sure, but not of the magnitude OPC suggests.

Indeed, I am not aware of any multiple-occurrence situation where the Commission has come close to levying the full \$25,000 per violation penalty that it may under the relevant statute. Certainly, this is not the case to create new precedent in this regard. Not even OPC has

alleged conduct so egregious as to merit the maximum per-incident fine. It has produced no evidence reflecting any policy or practice of disregarding this Commission's service standards. Absent such evidence, OPC has had no choice but to try to build a case upon unjustified inferences, rather than facts.

The issues designated for resolution in this case require the Commission to make specific findings as to "how many" willful violations of the respective repair and installation standards may have occurred. (Order No. PSC-00-0686-PCO-TL at App. A.) As such, in order for the Commission to accept OPC's recommendation to fine Verizon for every one of the 773 service standard misses, the Commission would have to examine each of these individual misses; conclude that each one could have been prevented if Verizon had spent more money on maintaining the network; and that Verizon knew it could have prevented each miss by spending more money. OPC has not even attempted to do the requisite analysis; it has proven no willful violations, let alone 773.

Α.

Q. ARE THERE OTHER FACTORS THE COMMISSION SHOULD RECOGNIZE IN DECIDING THIS CASE?

Yes. The Commission should keep in mind that Verizon has a voluntary service performance guarantee program, under which it paid customers almost 3 million dollars from 1997-1999 for missed installation and repair commitments.

Q. WHAT IS VERIZON'S RECOMMENDATION FOR THE COMMISSION

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The Commission should close this docket without assessing any penalties against Verizon. The OPC has not and cannot prove that Verizon's periodic failures to meet the Commission's service standards were in any way willful. None of the documents Mr. Poucher cites indicates that compliance with the PSC's service standards was anything other than a top priority for Verizon's management in Florida and at Headquarters. While Verizon has missed the repair and installation standards at various times, the Company has done the best it can, given the unusually stringent nature of the Florida standards and ongoing challenges such as extreme weather and the difficulty in Finally, and perhaps most importantly, retaining quality workers. Verizon's service quality results over the past year and a quarter have been exemplary. The programs I undertook shortly after I became President (and before this show cause began) have clearly proven to be effective. As such, there is no need for punitive or remedial measures to ensure sustained compliance.

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Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

21 A. Yes.

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FLORIDA PSC STANDARDS

Comparison of October 1999 - December 2000 of GTE, Bell South and SPRINT

	1&T's in	OOS in
	3 Days	24 Hrs
	Obj:	Obj:
Month Company	90.0	95.0
Oct-99 GTE	82.9	95.1
BELL SOUTH	<i>7</i> 8.2	51.8
SPRINT	90.2	88.4
Nov-99 GTE	94.7	98.1
BELL SOUTH	78.6	59.6
SPRINT	83.1	79.0
Dec-99 GTE	97.5	97.1
BELL SOUTH	79.0	72.9
SPRINT	76.1	92.9
Jan-00 GTE	97.2	97.9
BELL SOUTH	83.5	83.9
SPRINT	84.6	96.4
Feb-00 GTE	98.2	97.6
BELL SOUTH	89.6	88.2
SPRINT	89.4	98.2
Mar-00 GTE	99.2	97.7
BELL SOUTH	94.1	89.2
SPRINT	92.1	98.2
Apr-00 GTE	99.1	98.1
BELL SOUTH	95.9	
SPRINT	92.6	97.8

	I&T's in	OOS in
	3 Days	24 Hrs
	Obj:	Obj:
Month Company	90.0	95.0
May-00 GTE	99.3	98.7
BELL SOUTH	96.6	91.3
SPRINT	93.8	98.4
Jun-00 GTE	99.1	96.7
BELL SOUTH	96.6	87.3
SPRINT	92.6	96.3
Jul-00 GTE	98.9	96.3
BELL SOUTH	98.2	85.6
SPRINT	91.8	96.3
Aug-00 GTE	98.5	96.7
BELL SOUTH	98.2	86.0
SPRINT	91.6	95.6
Sep-00 GTE	98.8	96.5
BELL SOUTH	98.2	81.1
SPRINT	91.1	96.4
Oct-00 GTE	98.2	97.4
BELL SOUTH	92.2	74.8
SPRINT	92.0	97.8
Nov-00 GTE	97.4	96.7
BELL SOUTH	93.5	87.6
SPRINT	91.7	97.9
Dec-00 GTE	97.6	96.7
BELL SOUTH	93.0	85.7
SPRINT	94.3	98.1

Rebuttal Testimony of John A. Ferri Exhibit JAF FPSC Exhibit No.



Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-2 FPSC Exhibit No.

April 20, 2001 Page 1 of 6

Debby B. Kampert
Regional Administrator-Regulatory Affairs (FL)

GTE Telephone Operation_

One Tampa City Center
Post Office Box 110, FLTC0616
Tampa, Florida 33601-0110

April 2, 1998

Mr. Clayton Lewis
Bureau of Service Evaluation
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FI 32399-0850

Re: 1997 New Service Installations and Out of Service Repair

Dear Mr. Lewis:

The following information is provided in response to your request for information regarding service results in 1997.

Explanations/ Narratives

Along with the service standard results for each quarter in 1997, GTEFL provided the commission with an explanation where service standards were missed. Copies of those narratives are attached for your convenience. The primary reason for the decline in results for new installations and out of service repair was the severe weather conditions we experienced due to El Nino.

1998 Plans

In addition to the anticipation of more normal weather conditions, GTEFL does have certain plans in place to increase headcount and improve productivity in 1998. These plans include but are not limited to the following:

- Region Operations is staffing 94 service installer and 24 facility maintainer positions in 1998. Infrastructure Provisioning is staffing 50 Outside Plant Construction and 25 COE Installation positions. As positions are filled each week the new hires are being sent to training.
- Effective February 23, 1998, a team has been dedicated to both corrective and preventive plant maintenance.
- Reorganization of the dispatch and resource management group will provide dedicated resources who will closely monitor commitment times and due dates and then move manpower where needed to meet these commitments.

I trust this provides this information your require. Should you have any questions or require additional information, please feel free to call me.

Sincerely,

Debby B. Kampert

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Enclosures

April 20, 2001 Page 2 of 6

EXPLANATION OF MISSED SERVICE STANDARDS SECOND QUARTER 1997

SCHEDULE: 11 - OOS CLEARED WITHIN 24 HOURS

DATA MONTH: APRIL 1997

The Bradenton exchange had 1,146 out of service trouble reports with 1,076 reports cleared within 24 hours. The 70 reports not cleared within 24 hours were due to the severe inclement weather, along with the increased demand activity, we experienced the last week of the month.

The Myakka exchange had 52 out of service trouble reports with 47 reports cleared within 24 hours. The 5 reports not cleared within 24 hours were due to the severe inclement weather, along with the increased demand activity, we experienced the last week of the month.

The Palmetto exchange had 348 out of service trouble reports with 310 reports cleared within 24 hours. The 38 reports not cleared within 24 hours were due to the severe inclement weather, along with the increased demand activity, we experienced the last week of the month.

The St Petersburg exchange had 3,323 out of service trouble reports with 3,113 reports cleared within 24 hours. The 210 reports not cleared within 24 hours were due to the severe inclement weather, along with the increased demand activity, we experienced the last week of the month.

Action Plan: Not Applicable

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Docket No. 991375-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-2 FPSC Exhibit No. ______ April 20, 2001

Page 3 of 6

EXPLANATION OF MISSED SERVICE STANDARDS THIRD QUARTER 1997

SCHEDULE: 2 - SUMMARY OF COMPLETED SERVICE ORDERS (PRIMARY)

DATA MONTH: JULY 1997

The Myakka Exchange had 28 total service order requests with 25 requests completed within three days. The 3 requests not completed within three days were due to reallocating manpower to address the increased volume in our out of service commitments due to the severe weather experienced the first and second week of the month. A service emergency was declared from July 14 through July 16.

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Action Plan: Not Applicable

April 20, 2001

EXPLANATION OF MISSED SERVICE STANDARDS THIRD QUARTER 1997

SCHEDULE: 11 - OOS CLEARED WITHIN 24 HOURS	
DATA MONTH: JULY 1997	

The St. Petersburg exchange had 4,501 out of service reports with 4,080 reports cleared within 24 hours. The 421 reports not cleared within 24 hours were due to increased volume in our out of service commitments due to the severe weather experienced the first and second week of the month. A service emergency was declared from July 14 through July 16.

The Clearwater exchange had 3,195 out of service reports with 2,977 reports cleared within 24 hours. The 218 reports not cleared within 24 hours were due to increased volume in our out of service commitments due to the severe weather experienced the first and second week of the month. A service emergency was declared from July 14 through July 16.

The Hudson exchange had 477 out of service reports with 442 reports cleared within 24 hours. The 35 reports not cleared within 24 hours were due to increased volume in our out of service commitments due to the severe weather experienced the first and second week of the month. A service emergency was declared from July 14 through July 16.

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Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-2 FPSC Exhibit No.

April 20, 2001 Page 5 of 6

EXPLANATION OF MISSED SERVICE STANDARDS THIRD QUARTER 1997

SCHEDULE: 11 - OOS CLEARED WITHIN 24 HOURS

DATA MONTH: SEPTEMBER 1997

The St. Petersburg exchange had 3,783 out of service reports with 3,228 reports cleared within 24 hours. The 555 reports not cleared within 24 hours were due to severe flooding from rain in excess of 14 inches in a two day period.

The Clearwater exchange had 3,028 out of service reports with 2,844 reports cleared within 24 hours. The 184 reports not cleared within 24 hours were due to severe flooding from rain in excess of 10 inches in a two day period.

The Palmetto exchange had 343 out of service reports with 321 reports cleared within 24 hours. The 22 reports not cleared within 24 hours were due to rain in excess of 6 inches in a two day period.

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Action Plan: Not Applicable

EXPLANATION OF MISSED SERVICE STANDARDS

FOURTH QUARTER 1997

DATA MONTH: DECEMBER 1997
SCHEDULE 2 - FROSTPROOF, HAINES CITY, INDIAN LAKES, AND MULBERRY
MISSED THE OBJECTIVE FOR COMPLETED SERVICE ORDERS IN THREE DAYS.
SEE EXPLANATION BELOW.

SCHEDULE 11 - ALL EXCHANGES MISSED THE OBJECTIVE FOR OUT OF SERVICE CLEARED WITHIN 24 HOURS. SEE EXPLANATION BELOW.

SCHEDULE 17 - ALL SERVICE CENTERS EXCEPT FOR BARTOW, LAKE WALES, PLANT CITY AND WINTER HAVEN MISSED THE OBJECTIVE FOR REPAIR APPOINTMENTS. SEE EXPLANATION BELOW.

SCHEDULE 18 - ALL SERVICE CENTERS EXCEPT FOR CLEARWATER AND LAKELAND MISSED THE OBJECTIVE FOR SERVICE ORDER APPOINTMENTS. SEE EXPLANATION BELOW.

THE FLORIDA REGION HAD RAIN IN EXCESS OF 15 INCHES, WHICH IS THE HIGHEST AMOUNT OF RAINFALL IN ONE MONTH SINCE THE WEATHER SERVICE BEGAN TRACKING RAINFALL. THIS IS COMPARED TO AN AVERAGE RAINFALL FOR DECEMBER OF 2.15 INCHES.

WHILE THE EXCESSIVE RAINFALL CAUSED UNUSUALLY HIGH SERVICE PROBLEMS, IT ALSO KEPT OUR WORK FORCE FROM PERFORMING THEIR JOB; ADDING TO THE VOLUME OF TROUBLE REPORTS AND SERVICE ORDERS.

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ACTION PLAN:

THE FLORIDA REGION, IN ITS EFFORTS TO MEET OUR OBJECTIVES, HAS HAD NUMEROUS SERVICE EMERGENCIES DUE TO THIS YEAR'S SEVERE WEATHER. WE USE ALL EMPLOYEES CAPABLE OF REPAIRING TROUBLE AND PERFORMING INSTALLATION, INCLUDING CONTRACTORS. WE REQUIRE WORKING SIX AND SEVEN DAYS AT 10 TO 12 HOURS PER DAY. WE ARE ALSO IN THE PROCESS OF ADDING APPROXIMATELY 150 MORE EMPLOYEES.

WE HAVE CAPTURED PATTERNS AND ARE NOW PREPARING FOR PROACTIVE MAINTENANCE ON THOSE AREAS THAT HAVE BEEN IDENTIFIED AS PROBLEM AREAS. OUR GOAL IS TO PREVENT OUR CUSTOMERS FROM HAVING PROBLEMS WITH THEIR SERVICE, EVEN IN THE SEVEREST WEATHER CONDITIONS.

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Key Performance Indicators

In 1997, Florida Region experienced very severe weather. Total rainfall for the year was 67.71 inches, 23.79 inches above normal. Lightning increased 32% and 84% over 1996 and 1995 levels, respectively. December's weather was particularly unusual. December typically is a dry month with average rainfall of 2.15 inches. December 1997 rainfall was a record 15.57 inches. Florida Region's Service/Quality indicators continued to be adversely impacted by the record rainfall and extreme flooding throughout most of December and tornadoes in late December. Two counties in Florida Region's operating area were declared federal disaster areas by President Clinton. Service Emergency conditions were in effect for approximately half of the month. January incurred expense results will be adversely impacted. Repair Out of Service in 24 Hours and Service Order Appointments Met results were below the PSC standard of 95% for the month.

The Region's service levels will improve as the weather stabilizes. The Region continues to have conference calls twice a week and weekly meetings to continuously monitor results. The calls are with the ACOMs, DAC/FAC, IP, CARE, and staff to review the status and actions associated with service orders, trouble, missed commitments, carryover, overtime, etc. The weekly meetings review root cause analysis of Commission complaints and review weekly service results, productivities, and overtime. These calls and meetings have positively impacted numerous measure results. Additional specific comments and actions are as follows: \mathbb{C}

- In the Large category, Overall Value, Installation, and Repair results again were 100 for the month; however YTD results remained unfavorable to objective. As part of the 1998 Customer Excellence Process, the Account Manager and Customer Advocate will meet with each Large customer in in January to determine the customer's expectations for excellent value and service and develop an action plan to meet or exceed their expectations. The Region President and the General Manager-Branch Operations will meet with all large customers semi-annually. In addition, a monthly meeting or conference call focusing on a detailed review of customer survey results and development of corrective action plans to resolve issues will continue. The Region Customer Operations General Managers, General Manager Branch Operations, Regional Sales Managers, and Customer Advocates participate in these meetings/conference calls. The following actions also remain in effect. Each Regional Sales Manager visits TICOS customers with the Account Manager and Area Manager Customer Operations to work through customer issues and concerns. All customers are contacted either verbally or on premise within 24 - 48 hours of any repair activity by appropriate GTE personnel. As part of root cause analysis, a review is conducted with customers to determine why they rated GTE "Average" or below. Also, technicians are being assigned to specific customers, where possible, to promote customer ownership and to match expertise required. Technicians will continue to be trained on basic customer service, emphasizing courtesy, professional dress. and communication skills. A procedure has been developed for the BDCC for escalating/handling/prioritizing commitments in jeopardy.
- In the Medium category, Overall Value was 100 for the month of December. Overall Value, Installation, and Repair YTD results remained below objective. In 1998, the Region President and the General Manager-Branch Operations will meet with all strategic Medium customers semi-annually. The Region Customer Operations General Managers and Area Managers and Regional Sales Managers will meet with all Medium customers semi-annually. Many of the other action items listed above for Large customers also apply to Medium customers.

Key Performance Indicators

Florida Region's Service/Quality indicators continued to be strong in installation, repair, and reliability measures i weather at the end of April had an adverse impact on May's incurred expense results. Customer survey results an services area are generally favorable for the month. In May there was continued emphasis on strong performance specifically, Repair Out of Service in 24 Hours and Service Order Appointments Met. Repair Out of Service in 2 exceeded the PSC standard of 95% for the sixth consecutive month, and Service Order Appointments Met exceed 95% for the fifth straight month.

The improved service levels attained through May will be maintained since the Region has implemented its plan hiring additional service installers. The Region has also implemented daily conference calls and weekly meetings results. The daily calls are with the ACOMs, DAC/FAC, IP, CARE, and staff to review the status and actions assoc trouble, missed commitments, carryover, overtime, etc. The weekly meetings review root cause analysis of Com review weekly service results, productivities, and overtime. These calls and meetings are having a positive impac measure results. Additional specific comments and actions are as follows:

- In the Large category, Overall Value was 100 again in May. Installation results were below objective. Repair remained below objective. The following action plans remain in effect. Each Regional Sales Manager will vi the Account Manager and Area Manager Customer Operations to work through customer issues and concerns contacted either verbally or on premise within 24 48 hours of any repair activity by appropriate GTE person analysis, a review will be conducted with customers to determine why they did not rate GTE "Excellent". Res improve with the implementation of the Business Response Center, the Business Dispatch Control Center, co techs, and the establishment of the "Contract of Excellence".
- In the Medium category, Overall Value, Installation, and Repair results declined in May and remained below action plans listed above for Large customers also apply to Medium customers.
- In the Small category, Overall Value YTD results exceeded objective. Overall Value for B1 exceeded objectimenth and was slightly below objective on a YTD basis. B1 Overall Value YTD results were the highest in T improve results include the following: having the technician verify/explain to the customer all features install establishment of a pilot program where Tappers call and review vertical services/CentraNet features with cust service orders.

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Key Performance Indicators (cont'd)

- Installation for Small remained below objective. To improve this measure, Florida Region has instituted a pol service order is missed due to a bad pair needing to be cleared, the pair will be treated as an OOS case of tro amount of overall time to get an order completed. Previously, the order was rescheduled which could add t process versus less than 24 hours. This has helped to improve the Average Days to Install-Business measure objective for the month and YTD. Average Days to Install-Residential YTD results improved in May and met t and YTD. Additional emphasis has been placed on MSI Aborts which are now measured by the length of tim orders should be improved through the use of the new DSTS test system.
- Repair for Small remained below objective. Actions being taken include the following: technician is going t communicate service problems prior to starting and after restoral of service, technician to verify all phones/ja customer's satisfaction before leaving the premise, continue chargeable repeat program, VRS testing from 4-T trouble report, and CARE Center programs.
- Residential Overall Value improved in May and exceeded objective for the month. Current month and YTD r Telops for the fourth consecutive month.
- Residential Installation results exceeded the objective for the third straight month. YTD results remained sligh
- Residential Repair results exceeded the objective for the fifth consecutive month. YTD results remain favorab highest in Telops.
- Residential Installation Commitments Met results have met or exceeded the objective for five straight months. Commitments Met remained below objective. Committed Due Date-Business YTD results improved again in objective for the month and YTD. These results should continue to improve through additional resources bei work group and increased monitoring of the MSI queue.
- Residential Service Orders with Trouble in 7 Days results improved for the third consecutive month and were the month and YTD. Business Service Orders with Trouble in 7 Days results improved in May but remained

Key Performance Indicators

Florida Region continued to experience record rainfall and flooding in February. Despite the severe weather, many of Florida Region's Service/Quality indicators improved in February. Repair Out of Service in 24 Hours and Service Order Appointments Met results improved in February but were below the PSC standard of 95%. March incurred expense results will be adversely impacted.

The Region's service levels will improve as the weather stabilizes. The Region continues to have weekly meetings to review root cause analysis of Commission complaints and review weekly service results, productivities, and overtime. These meetings have positively impacted numerous measure results. Additional specific comments and actions are as follows:

- Branch CVI and CSI results were favorable to objective and favorable to 1997 annual results. Almost every component of both the value index and service index improved compared to 1997 annual results. Committed Due Date-Business results improved and were favorable to objective for the third consecutive month. Mean Time to Restore-Business results improved in February and were favorable to objective. Results were also favorable to 1997 annual results. The Region President and General Manager Branch Operations will meet with all large customers semi-annually. In addition, a monthly meeting or conference call focusing on a detailed review of customer survey results and development of corrective action plans to resolve issues will continue. The Region Customer Operations General Managers, General Manager-Branch Operations, Regional Sales Managers, and Customer Advocates participate in these meetings/conference calls. The following actions also remain in effect. Each Regional Sales Manager visits TICOS customers with the Account Manager and Area Manager Customer Operations to work through customer issues and concerns. All customers are contacted either verbally or on premise within 24 48 hours of any repair activity by appropriate GTE personnel. As part of root cause analysis, a review is conducted with customers to determine why they rated GTE "Good" or below. Also, technicians are being assigned to specific customers, where possible, to promote customer ownership and to match expertise required. Technicians will continue to be trained on basic service emphasizing courtesy, professional dress, and communications skills.
- BSC Customer Value Index results improved again in February and were favorable to objective for the month, but YTD results
 were below objective. YTD results are below 1997 annual results. The Price component of the value index was rated the lowest.

Key Performance Indicators

Florida Region's Service/Quality indicators continue to show steady improvement for the month of May. Repair Appointments Met, Out of Service within 24 Hours and Service Orders Completed within 3 days were above the PSC standard. Service Order Commitments Met continued to improve in May but was below PSC standard.

The Region has bi-weekly meetings to review root cause analysis of Commission complaints and review weekly service results, productivity, and overtime. These meetings have positively impacted numerous measure results. Additional specific comments and actions are as follows:

• Branch CVI May results are favorable to objective and to 1998 annual results. Value results are favorable to the benchmark company, Bell South. The Billing category is currently the lowest rated component. Branch CSI results are favorable to objective and 1998 annual results. All components of the index have improved over 1998 annual results and with Billing being the lowest rated component of Branch CSI. Committed Due Date-Business is unfavorable to 1999 objective and 1998 annual results. Mean Time to Restore – Business results are also unfavorable to objective and 1998 annual results.

Action plans: The Region President and General Manager-Branch Operations continue to meet with all Large customers semi-annually. In addition, a monthly meeting or conference call is held focusing on a detailed review of customer survey results and development of corrective action plans to resolve issues continues. The Region Customer Operations General Managers, General Manager-Branch Operations, Regional Sales Managers, and Customer Advocates participate in these meetings/conference calls.

The following actions remain in effect: Each Regional Sales Manager visits TICOS customers with the Account Manager and Area Manager Customer Operations to work through customer issues and concerns. Appropriate GTE personnel contact customers either verbally or on premise within 24-48 hours of any repair activity. As part of root cause analysis, a review is conducted with customers to determine why they rated GTE "Good" or below. Also, technicians are assigned to specific customers, where possible, to promote customer ownership and to match expertise required.

All business technicians have been through the Ambassador Training Program. Technicians are trained on basic service emphasizing courtesy, professional dress and communications skills. Adjusted schedules BZT/CZT according to peaking

Continued

11.21.1996 | 11:18

o. _____ April 20, 2001 Page 6 of 10

MTRACOMPANY CORRESPONDENCE



OTE Tolephone Operations

Reply Yo

November 20, 1996

FLYC0100 Tampa, FL

To:

Distribution List

Subject:

ORR ACTION ITEMS

As a result of our ORR meeting on November 18, there are several action items initiated. As highlighted in the meeting, the Florida Region will be taking the appropriate actions to turn key performance indicators in the proper direction. Most notably are customer complaints and PSC service standards.

The action items and the person responsible are:

- Guidalines reviewed and/or established pertaining to when pairs can/should be cut. Action to be completed by December 16. (Susan Clay and Larry Atwell)
- Identification of the number of pairs going bad each month and comparisons made to those being cleared each month to ensure appropriate balance. Action to be completed by December 5. (Alan Relily and Larry Yost)
- Identification of number of EDT's broken and cause for the Florida Region as well as plans to restore. Action to be completed by December 16. (Alan Reilly and Larry Yost)
- CARE call volumes and the impact of IVRU needs to be reviewed for dollar savings and potential customer irritation. Alternatives to IVRU scripting re-evaluated. Action to be completed by December 16. (Woodrow Williams)
- Region to review 1997 objectives for Small and Tel Cel Reliability and Clearing Interval-Residence. Action to be completed by December 5. (Pete Daks)
- Region to determine what portion of Repeats are attributable to the network versus knowledge/other. Action to be completed by December 16. (Larry Yost)
- Air pressure activities were discussed and region will provide how many tanks were in-place in 1995 versus last 1996. Action to be completed by December 5. (Alan Reilly)

Docket No. 991376-TL
Rebuttal Testimony of John A. Ferrell
Exhibit JAF-3
FPSC Exhibit No.
April 20, 2001

Distribution List November 20, 1996 Page 2

- Discuss with Consumer LOB President, Butch Bercher the need to evaluate the impact on PUC complaints and a result of moving the Action Line number in the directories.

 Action to be completed by December 5. (Pete Daks)
- Consumer LOB to ensure proper supervisory spans are in-place to provide for customer escalation within the centers. Action to be completed by December 5. (Karen Mounts)
- Staff to review when Due Date Manager will have the ability to provide a.m./p.m. commitments. Also, work with customer contact to document existing process flow to determine if revisions are needed. Action to be completed by December 16. (Larry Yost)

As we have discussed to ensure comprehensive results, accountabilities, and actions we will expand our current monthly operational reviews for Florida Region. These will include my direct reports along with Karen Mounts-Customer Contact Center Manager, John Schaffer-CARE Center Manager, Barbara Akins-Acting Business Sales Center Manager, Shawne Angelle-Branch Manager, Larry Yost-Manager-Remote Operations Support, and Russ Diamond-Regional Manager-BA. Attendance in person is mandatory.

Also based on the region results and the need for immediate action, we are beginning weekly meetings to ensure actions and results are taking place. The meeting will include specific reviews at the general manager level of customer complaints, PSC service standards, and related support measures. The weekly meetings are beginning November 21 and will be held each Thursday at 8 a.m with the same participants (at this time, Shawne is required at the monthly ORR and Natural Team meeting only). Again, attendance in person or by conference call is mandatory.

These actions are underway and several are being added to improve Florida Region results.

Peter A. Daks

Regional President-Florida

PAD:mmm

o: Distribution List



NETWORK SERVICES

INTRACOMPANY CORRESPONDENCE

Docket No. 991376-TL Rebuttal Testimony of John A. Ferreil Exhibit JAF-3 FPSC Exhibit No.

April 20, 2001 Page 8 of 10

Reply To FLTC0100 Tampa, FL

July 15, 1998

To:

M. L. Keith - HQE04E52 - Irving, TX

Subject:

WEATHER UPDATE

Red, our weather pattern has continued with thunderstorms yesterday afternoon and evening, and throughout the night. The thunderstorms and heavy rains are continuing this morning and predicted to continue throughout the day, moving in off the Gulf and across the Tampa Bay area this morning. Predictions are rainfall amounts of one to two inches in less than an hour are likely.

In the last twenty-four hours, the Inland Division has received in excess of two inches of rain and some areas in the Coastal Division received in excess of three-and-a-half inches of rain.

At 10:30 this morning, we had 5082 total cases of trouble (3517 in Inland and 1565 in Coastal). We have moved 110 cable splicers and contractors over into the Inland Division to shoot trouble, and 48 into the Coastal Division. We are continuing to work ten-hour days, and have required some lay days.

Out-of-service defaults remain at 10:00 and 11:00 a.m., same day for out-of-service. Not-out-of-service has been pushed to day two in Inland and remains standard in Coastal. We will continue to monitor this very carefully.

I will continue to keep you posted.

Peter A. Daks

Regional President-Florida

PAD:bam



GTE Telephone Operations

> Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-3

FPSC Exhibit No. _____

Reply To

August 5, 1997

FLTC0100 Tampa, FL

To:

Barry Paulson - HQE04E04 - Irving, TX

Subject:

FLORIDA REGION RESULTS

Attached are the areas of concern that I would like to discuss with you and your staff. These areas and their associated indices are ones that the Florida Region is taking aggressive steps to resolve. Each measurement, with history, is provided along with the Region's action plans which are in place or will be in place shortly.

I would like to discuss each indice to insure your concurrence with these steps and see if you have any additional suggestions.

The other items I would like to discuss are the Omega Process and status, CARE Express, and any plans or enablers that we should expect in 1998.

Should you have any questions or concerns, please call me at 813/483-1200

or Larry Yost at 813/483-2477.

Peter A. Daks

Regional President-Florida

-Fortel II

-Cluma liopes

2 hom anilon

PAD:mmm Attachments

c: Susan Clay - HQB12C54 - Irving, TX (w/a)
John Ferrell - HQE04B52 - Irving, TX (w/a)
Woodrow Williams - HQB10C41 - Irving, TX (w/a)

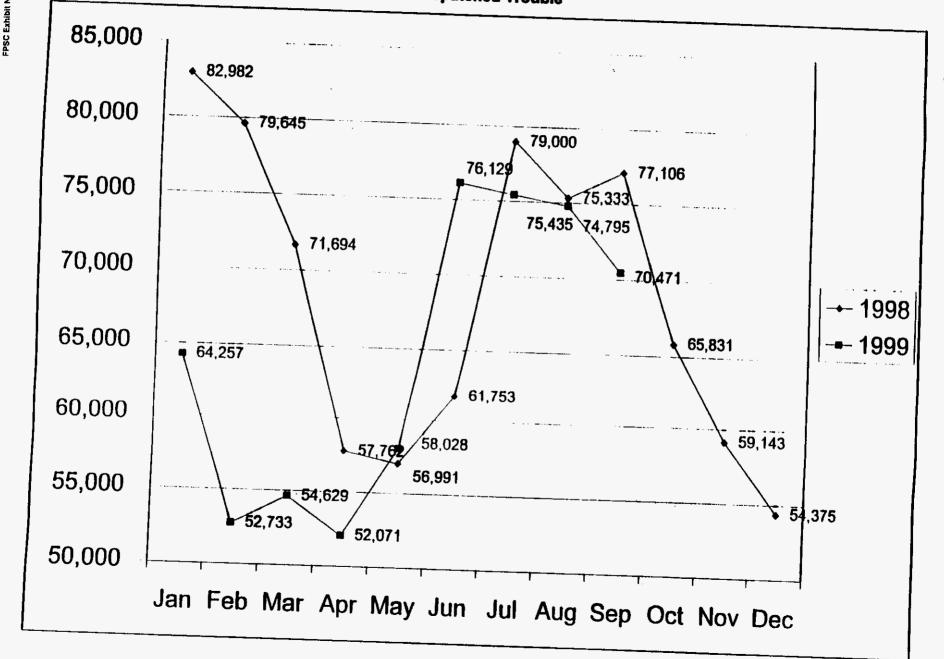
0 0 S / 24 HOURS

% COMMITMENTS MET

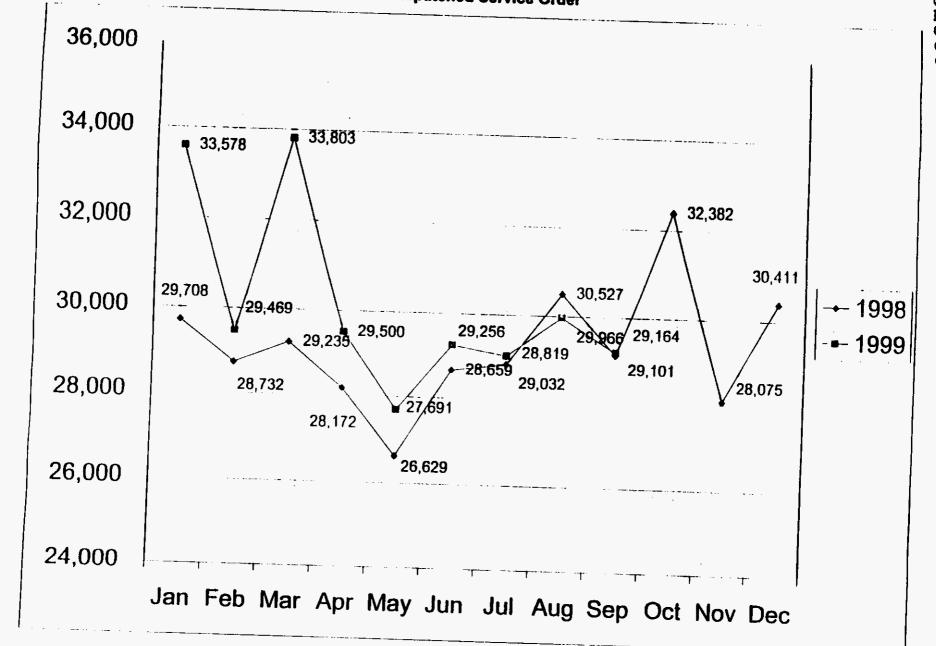
The Region has an objective to clear 95% of all out of service reports within 24 hours and to meet 97% of our business and residential commitments. Through June 93.7 of the OOS trouble had been cleared within the 24 hour objective. This declined to a 90.3% by the end of July. Business commitments through June were 96.3%, slightly below objective. Again, this dropped to a 94.1% in July. Residential commitments were 97.6% through June. In the month of June, residential commitments were 95.3%. July's results declined to a 92.3%. August results are trending upward.

- The first thing each morning, a conference call is made to discuss the trouble volumes and the action plans necessary to meet commitments. DRM, ACOM's, and GM's participate on this call. Technicians are moved between district as required.
- If necessary, contract labor forces from IP are utilized.
- A 3:30 P.M. conference call is held to discuss the day's results and begin planning for the next day.
- We have documented and are in the process of distributing the STORM / ABNORMAL CONDITION RESPONSE PLAN throughout the region.
- The TAS Default Commitment Screen is adjusted as required by trouble volumes. This
 process has been hampered by the inability of TAS to provide a unique cut-off time for
 both OOS and NOOS reports.

Florida Region Dispatched Trouble



Florida Region Dispatched Service Order



9/10/1999

Valarie,

Please find attached the repair commitment met action plan you requested.

I agree with you completely, with an average clearing time of 29 hours, commitments met should be much higher than 90%.

I am very excited about an initative that we have in the works. John Farrell is planning to conduct Mini ORR meetings with district teams performing consistently below objective. As I understand the process the district teams will have to answer two questions: Why are results below objective and what actions are being taken to get things turned around? I suspect there will also be a great deal of discussion concerning resources as there always is. The inquiring team (for lack of a better term) will consist of John Farrell, the responsible GM, Russ Diamond and me. The plan calls for quarterly (if not sooner) meetings or until the district's performance improves to the point where they get off the radar screen.

Russ Diamond and I will be meeting early next week to develop the district measurement template. I will keep you informed of our progress.

On another subject I am pursuing the development of an aged ticket report. As I'm sure you remember a similar report proved very successful in helping the WA. Division reduce its elapsed time.

I hope these action steps speak to your concerns.

Dan

COMMITMENT ACTION PLAN

- When the volume of reports is beyond the clearing capacity of the available workforce additional manpower is borrowed from IP and utilized in areas with the highest volumes. IP will add 55contractors to pick up the capital work activity and DOR backlog. This will maximize the number of 201's for repair activity. Manpower is moved between districts and divisions to assist with high trouble volumes as well.
- Actively pursue filling 301 vacancies to increase the number of 301 technicians available to relieve 201's for repair activity. (Currently 25 301 vacancies are in the process of being filled) Additionally, 30 contractors will be added to further relieve 201's for repair.
- The region is currently utilizing 9 "tappers" to reduce unnecessary dispatches.
 - "Tappers" to actively monitor possible pattern/outages utilizing TAS Function 30.
 - "Tappers" to actively monitor TAS for possible missed commitments utilizing Function 33.
 - Coach the "tappers" to recognize appointment/commitment irregularities and bring them to the attention of the dispatcher.
- Closely monitor the TAS default commitments.
 - DRM will consult with the respective ACOM before moving TAS default beyond the objective times.
 - Ensure GM approval before moving the TAS default beyond 72 hours
- Utilize the "Jobs Dispatched Report" to ensure technicians are utilized on customer demand activity. In August, 92.1% of the first jobs dispatched were on customer demand activity and overall 92.4% of all activity was customer demand.
- Ensure technicians are picking assignments in accordance with the Assurance and Fulfillment Priority Matrix.
 - Perform periodic audit trails on bypassed priorities and communicate information to the LCOM for corrective action.

- Follow-up on MT alerts to include paging LCOM's and ACOM's on all alerts. Field premise visits are required by LCOM's and follow-up given to DRM.
- Team with CARE to develop realistic levels of CASS appointment capability.
- Examples of AWAS/CASS/TAS appointment errors are provided to CARE as coaching opportunities. A CARE system enhancement installed on August 18th will assist in reducing these errors.
- Provide CARE with examples of AWAS appointments made outside of the CASS appointment system.
- Perform root cause on misses to identify training opportunities for both CZT and CARE technicians.
- Technician that are identified by the LCOM as not meeting productivity objectives will be coached and their progress monitored. Those that fail to improve to objective will be placed on performance improvement Plans.
- Technicians must contact their coach for authorization to incomplete a repair. Technicians have been instructed on the proper method for determining the "cleared" time to be used when clearing reports when the customer's service has been restored but additional activity is required.
- Utilize a mechanized timesheet audit to ensure that the technicians are producing the maximum number of jobs per day.
- Stress the need to meet all AWAS/CASS/TAS appointments with all technicians.
- Perform root-cause-analysis on previous day's missed commitments for coaching opportunities. Communicated this information to the ACOM's.

Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-6 FPSC Exhibit No. April 20, 2001

Florida Region Service Improvement Plan % OOS Cleared In 24 - Hours

The following plan was developed as a means of increasing the Florida Regions % OOS cleared in 24 - hours to 95%.

Background Information

During the month of April, the Florida Region achieved a completion rate of 92.5% OOS cleared within 24 – hours. Of the total OOS reports, 3,317 were committed for greater than 24 – hours with no appointment. Included in the 3,317 reports are OOS reports that were committed for greater than 24 – hours with a 9 PM commitment (these reports were originally established as NOS and later changed to OOS by the clearing technicians). Of the 3,317, OOS reports 2,907 were taken on either a Saturday or Sunday. On average, 60% of the reports were taken on Saturday and 40% on Sunday.

Gap Closure

The computed gap between 92.5% and 95% OOS cleared in 24 – hours for the month of April amounted to 656 trouble reports. Increasing the number of technicians scheduled on the weekend has the greatest potential to close the 656 ticket gap as 87.6% of the OOS reports currently exceeding 24 hours are being created over the weekend (See Attached).

26,234	Total CFM OOS/24
24,266	MET OOS/24 (92.5)
<u>24,922</u>	95% objective
6 56	Difference of 2.5% (95.0 – 92.5)

Proposed Regional Staffing Adjustment

- Increase existing Saturday maintenance coverage by 20 technicians.
- Establish a maintenance shift on Sunday consisting of 16 technicians.

Saturday Coverage:			Sunday Coverage:		
656 x 60%	=	394 reports	6 56 x 40%	=	262 reports
394/ 4 Saturdays	=	98.5 reports	262/4 Sundays	=	65.5 reports
98.5/4 reports per tech	=	25 techs	65.5/4 reports per tech	=	17 techs

Budget Implications

The staffing of Sunday coverage will create an additional expense of \$5,320.32 per month (four weekend months) due to the contractual obligation of paying time and a half for technicians assigned to Sunday coverage.

17 technicians (X) 8 hours (X) 4 weeks (X) \$9.78 = \$5,320.32 (\$69,164.16 annually)

It is assumed that technicians currently assigned Monday through Friday will be reassigned to staff the increased Saturday and Sunday schedules.

Additional Activities

ROS will work with CARE and the field to reduce the number of NOS reports being cleared as OOS reports by the clearing technicians.

ROS will work with the Operations teams to ensure the OOS identifier is being applied correctly during the clearing process.

Florida Region Service Improvement plan % OOS Cleared In 24 - Hours

<u>Date</u>	OOS Trouble Quoted Over 24 Hrs. with no Appointment	OOS Trouble Quoted Over 24 Hrs. with a 9 PM Commitment (NOOS to OOS)
	<u> </u>	man de la constantina del Constantina de la Cons
4/1/99	11	0
4/2/99	50	23
4/3/99 Sat	392	13
4/4/99 Sun	280	13
4/5/99	16	3
4/6/99	10	1
4/7/99	9	0
4/8/99	14	1
4 /9/ 99	16	7
4/10/99 Sat	371	26
4/11/99 Sun	2 63	18
4/12/99	22	8
.3 /99	23	12
4/14/99	19	3
4/15/99	12	0
4/16/99	28	3
4/17/99	840	28
4/18/99 Sat	198	14
4/19/99 Sun	20	5
4/20/99	22	12
4/21/99	13	2
4/22/99	10	2
4/23/99	21	11
4/24/99 Sat	426	30
4/25/99 Sun	160	13
4/26/99	11	1
4 /27/ 99	20	1
4/28/99	8	6
4/29/99	26	17
4/30/99	4	3

FROM A REILLY IF EXEC OFC 818-277+9579

(TUE) 10, 26, 99 7:43/ST. 7:41/NO. 4261623760 F 2

1999/2000 Service Order Dispatch Reduction

Short Term I's and M's in Three Days Action Plan

Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-7 FPSC Exhibit No. ____

April 20, 2001

- Move due date manager to three days immediately.
 - DRM and IP Support team/review daily manpower requirements.
 - Oue Date Manager has been augmented with contract personnel
 - IP Personnel will supplement Due Date Manager overbooking to maintain 3 day due date during peak times
 - As a last resort, Sunday volunteer staffing will be utilized at month end to handle service order peaks.
- * Adjust *C* order due dates away from peak time end/beginning of month.
- Further accelerate proactive field-trip reduction by targeting exchanges not meeting objectives
 - EDT new wood, broken, etc.
 Quality Performance Measures/Daily Tracking
 - Continue records verification at crossboxes with existing DAVAR units
 focusing in areas where measures are deficit and vacation service is prevalent.
 Continuing in January with new YZK/AAIS compatible DAVAR units.
 - LINKIN for new complexes and sublocation reports for existing muttifamily dwellings.

 Quality Performance Measures/Daily Tracking
 - Continue daily review of NOCV reports for CLEC, LinklN, and Sublocation service orders that should not be fielded
 - Continue calling on POTS service orders from NOCV sublocation report in an effort to stop unnecessary field trips

INTERCOMPANY CORRESPONDENCE



GTE Network Services

Sepember 2, 1999

Reply to:

FLTC0100 - Tampa, FL

To:

M. L. Keith - HQE04E52 - Irving, TX

Subject: FLORIDA REGION PSC SERVICE IMPROVEMENT PLAN

Attached for your review are the Florida PSC service indices currently performing below objective and their associated corrective action plans.

In addition to these plans, the Florida Region team will carry out the following strategies as a guide to accomplishing the Region's long-term success in meeting these service requirements:

- In an effort to meet higher than anticipated seasonal activity, the IP organization will extend its support of customer driven work activity through the remainder of the year or until the need diminishes. IP will add fifty-five (55) contractors to pick up the capital work activity and DOR backlog. Special focus will be placed on getting the Inland Division caught up and moving the default commitment windows to a level that supports the meeting of PSC indices.
- The Region plans to immediately add up to thirty (30) service order contractors, ten (10) in the Coastal Division and twenty (20) in the Inland Division. The budget impact of these additions in 1999 is expected to be \$338K. Initially, the contractors will relieve the need for LG 201's from having to support service order activity and concentrate their time on trouble. Ultimately, the contractors will enable the Region to help meet the seasonal increase in service order demand expected at year end. There are currently twenty-five (25) LG 301 service installer positions in differing phases of being staffed/trained.
- The issue of productivity has been an ongoing concern for the Region. Currently, 12% of the LG 201 and LG 301 workforce (114 technicians) are on performance improvement plans for low productivity or quality. Additionally, during the last several weeks two (2) new reports have been created to help the operations teams quickly identify clearing anomalies as well as multiple completions on the same job.

M. L. Keith September 2, 1999 Page 2

 The reduction of unnecessary trips is fundamental to the long-term success of the Region. Admittedly, repeats and no accesses are not where we want them to be. ROS is currently leading an effort to expand the existing chronic repeat program as a means of reducing trips and has implemented the HQ Rework Reduction Plans.

Should you have any questions or concerns, I can be contacted at 813/483-1200 or Dan Carbone at 813/483-2477.

John A. Ferrell

Regional President - Florida

JAF:dml

PSC REQUIREMENTS

OOS 24 HOURS

The Florida PSC requires that 95% of OOS troubles be cleared within 24 hours. The Florida Region met this objective for the months of January through May. This objective was not met June through August.

A study identified the top 4 reasons for missed OOS/24

CARRYOVER

• The volume of reports is beyond the clearing capacity of the available workforce. Additional manpower is borrowed from IP and utilized in areas with the highest volumes. Manpower is moved between districts and divisions to assist with high trouble volumes as well.

NOOS CHANGED TO OOS

- A job aid has been provided to the field technicians to assist them in making the correct OOS/NOOS decision. Lengthy commitment times during inclement weather may lead to faults deteriorating to an OOS condition.
- ROS will perform periodic audit to ensure the correct determination of the OOS/NOOS status.

CARE ERRORS

• Examples of AWAS/CASS/TAS appointment errors are provided to CARE as coaching opportunities. A CARE system enhancement installed on August 18th will assist in reducing these errors.

• REPAIRS INCOMPLETED BY TECHNICIANS

 Technicians must contact their coach for authorization to incomplete a repair. Customers should not be left OOS.
 Technicians have been instructed on the proper method for determining the "cleared" time to be used when clearing reports when the customer's service has been restored but additional activity is required. A study by the Inland DRM in May found that 5% of the missed OOS/24 were attributed to technicians incompleting jobs.

- The region is currently utilizing 9 "tappers" to reduce unnecessary dispatches.
- Perform root cause on misses to identify training opportunities for both CZT and CARE technicians.
- Ensure technicians are picking assignments in accordance with the Assurance and Fulfillment Priority Matrix.
- Actively pursue filling 301 vacancies to increase the number of 301 technicians available to relieve 201's for repair activity. (Currently 25 301 vacancies are in the process of being filled)
- Utilize the "Jobs Dispatched Report" to ensure technicians are utilized on customer demand activity. In August, 92.1% of the first jobs dispatched were on customer demand activity and overall 92.4% of all activity was customer demand.
- Utilize a mechanized timesheet audit to ensure that the technicians are producing the maximum number of jobs per day.
- Closely monitor the TAS default commitments.
- IP will clear bad pair DOR's thus maximizing the number of 201's for repair activity.
- ROS is expanding the repeated report program beyond the current chronic repeat process as a means of reducing overall repeated reports.
- Technician that are identified by the LCOM as not meeting productivity objectives will be coached and their progress monitored. Those that continue to improve to objective will be placed on performance improvement Plans.

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Rebuttal Testimony of John A. Ferreli
Exhibit JAF-8
FPSC Exhibit No.
April 20, 2001
Page 5 of 7

NOOS 72 HOURS (95%)

The Florida PSC requires that 95% of NOOS troubles be cleared within 72 hours. The Florida Region met this objective for the months of February through May. This objective was not met in January and June through August.

- Hold the TAS defaults to no more than 3 days
- Ensure GM approval before moving the TAS default beyond 72 hours

REPAIR APPOINTMENTS (95%)

The Florida PSC requires that 95% of Repair Appointments be met. The Florida Region met this objective for the months of January through June. This objective was not met in July and August.

- Stress the need to meet all AWAS/CASS/TAS appointments with the technicians.
- Team with CARE to develop realistic levels of CASS appointment capability.
- Provide CARE with examples of AWAS appointments made outside of the CASS appointment system.
- Provide CARE with examples of appointment/commitment errors for coaching opportunities.
- Coach the "tappers" to recognize appointment/commitment irregularities and bring them to the attention of the dispatcher

SERVICE ORDER APPOINTMENTS (95%)

The Florida PSC requires that 95% of Repair Appointments be met. The Florida Region has not met this objective in 1999.

- The overbooking of service order hours to control a specific due date will not be allowed without the specific authorization of the respective ACOM. All overbooking decisions must be accompanied by a field manpower-scheduling plan.
- The Contact Center will perform random audits to assure contact representatives are not overbooking appointments in excess of established parameters. This is a compliance issue, technicians found not to be following the established procedures will be disciplined.
- LCOM's will perform random audits to assure field technicians are correctly applying arrival times on all completed orders.
- ROS will coordinate with NOCV support to rectify an edit queue issue, which incorrectly charges met service orders as missed. An analysis of missed service order commitments by the Coastal DRM determined the impact to be 4% of the Coastal's missed commitments.

I & T ORDERS 3 DAYS (90%)

The Florida PSC requires that 90% of I & T Orders be completed within 3 days. The Florida Region met this objective in January and April through June. This objective was not met in February, March, July or August.

- Fifteen percent of the service order activity has been budgeted to be worked by 201's. The 201's have been pulled to work repair resulting in missed commitments. Manpower borrowed from IP is being used to replace the 201's.
- Reassigned bad pair DOR's to IP for resolution.
- GM approval is required to move due date beyond 3 days.
- Completed orders routed by the system to an "edit" queue and not corrected the same day are being counted as missed commitments and appointments if applicable. An analysis of missed service order commitments by the Coastal DRM determined the impact to be 4% of the Coastal's missed commitments. ROS is actively pursuing this issue with NOCV support.
- Technician that are identified by the LCOM as not meeting productivity objectives will be coached and their progress monitored. Those technicians failing to improve will be placed on performance improvement plans.
- All new primary installations associated with multi-tenant dwelling and track housing will be preinstalled (EDT) by IP.
- Service orders are scheduled and worked in all areas Monday through Saturday.
- Orders requiring more than a 2 step station transfer are referred to IP for resolution.

Docket No. 991376-TL Rebuttal Testimony of John A. Ferreli Exhibit JAF-9 FPSC Exhibit No.

April 20, 2001

To: Nancy Franklin@TEL.EXEC@TXIRV

From: Red Keith@TEL.EXEC@TXIRV riginated by: John Ferrell@TCC.EXEC@FLTPA

Cc:

Subject: fwd: Florida results

Attachment: BEYOND.RTF

Date: 11/30/99 10:14 AM

PLEASE FILE--FLA REGION. THANKS, RED

From: John Ferrell@TCC.EXEC@FLTPA, on 10/15/99 2:53 PM: To: Red Keith@TEL.EXEC@TXIRV

Red.

Our Team has spent a considerable amount of time reviewing our PSC results and action plans that have been in place looking for new opportunities. Just as a note, we have never set an expectation that these results were not important nor unattainable but achieving them during all summer months would be difficult at best.

Per your request, the following information provides our latest view on PSC results, attainment, and our management oversight process.

The September PSC results have improved over August in 3 of the 4 that were missed. All objectives listed below are at 95% with the exception of Primary Service in 3 Days at 90%. The current results are through October 14th.

- OOS in 24 Hours ended at 91.4%. This was the highest in the past 4 months and currently is at 93.1%.
- NOOS in 72 Hours ended at 86.5%. This also was the best in the past 4 months but is currently down at a 77.3%.
- Repair Appointments Met exceeded the standard at 95.8% after being below the past 2 months. It currently is above objective at 97.3%.
- Primary Service Orders in 3 Days ended the month at a 75.5% against an objective of 90%. This standard has been missed for 3 consecutive months. It currently is up to 83.7%.
- Service Order Appointments Met ended at 92.8%. This standard has been missed each month since NOCV has been implemented. This result is up over the past 2 months and is currently up even higher at 93.1%.

All are moving in the right direction with the exception of the Not Out Of Service in 72 Hours which has suffered as we have made efforts to improve on the Out Of Service cases of trouble. NOOS is bottom priority that is pushed when service order and OOS demand increase above available hours.

Review of the PSC results are monitored daily and MTD by the GM's, ACOMs/BCOMs, DRM, and me. These are reviewed by district to provide us the information as to where the challenges exist. As a team, results are reviewed with my direct reports weekly either through my staff meetings and/or our Natural Lite team meetings. These are helpful to discuss the issues with the CARE, BCS/CCC, BDCC, and BRC. I have faxed to you a copy of our daily report. Both GMs report daily on the reasons for missing key objectives and what can be done to close the gap.

Area reviews are held by the GM, ROS, BA, and myself with the manager and Local Managers. These reviews target service improvement efforts, issues, results, and employee performance. I am planning to expand these to include IP within the area to promote even higher levels of teaming.

Daily planning is performed in the DRM each morning and afternoon to set trouble cut-offs and determine

The plans we have to improve these results to the PSC objective include several actions. These include continual hiring and training of new employees to replace those retiring, additional contractors to supplement deficiencies in manpower levels during hiring/training (58 in total), better focus on proper clearing of repair tickets, and working with CARE to improve the issue with NOOS/OOS clearings. Based on these plans and historical reduction of trouble during the upcoming months, the region believes it can get on a run-rate to attain PSC objectives by late October/early November given historic trouble pattern trends.

The region has also uncovered a possible system problem with the date being used to complete off-line service orders. The date being used for orders that go to off-line is the date the order is fixed in off-line. In many cases this is days later than the order was actually completed and the customer in service, however has been counted as a miss. These orders may be going to off-line for billing, directory, or address issues. Pending the outcome, we may be able to adjust prior months results.

Please contact me with any questions or comments.

Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-9

FPSC Exhibit No.

April 20, 2001 Page 2 of 2

John

EXPLANATION OF MISSED SERVICE STANDARDS FIRST QUARTER 1999

DATA MONTH: JANUARY 1999

MISSED OBJECTIVES BY EXCHANGE:

SCHEDULE 18	SCHEDULE 17	SCHEDULE 11	SCHEDULE 11	SCHEDULE 2
SERVICE ORDER	REPAIR	OOS/24	NOS/72	COMPLETED
APPOINTMENTS	APPOINTMENTS	HOURS	HOURS	ORDERS
BARTOW BRADENTON CLEARWATER HAINES CITY LAKE WALES LAKELAND NEW PORT RICHEY PLANT CITY SARASOTA ST PETE TAMPA VENICE WINTER HAVEN	BARTOW	BRADENTON ENGLEWOOD FROSTPROOF HAINES CITY INDIAN LAKE LAKE WALES MULBERRY MYAKKA NORTH PORT PALMETTO PLANT CITY VENICE WINTER HAVEN	BRADENTON CLEARWATER HAINES CITY HUDSON INDIAN LAKE LAKE WALES LAKELAND MULBERRY MYAKKA NEW PORT RICHEY PALMETTO POLK CITY SARASOTA ST PETE TARPON SPRINGS VENICE WINTER HAVEN	BARTOW MYAKKA PALMETTO

SCHEDULE 17 AND 18

We are reinforcing with our contact personnel and field technicians that appointments must be typed in the correct system format and that the arrival time must be entered on the order.

SCHEDULE 11

Florida Region overall met the out of service cleared within 24 hour objective at 95.1%. None of the exchanges were below results of 90%. We reallocated manpower to the out of service customers, which impacted the not out of service trouble.

SCHEDULE 2

Florida Region overall met the primary orders objective at 93.6%. Only three exchanges out of 24 did not meet standards.

Note: We assumed some risk with the reallocation of manpower. Some exchanges missed the appointments, both service order and repair, as well as the not out of service trouble.

Action Plan: We are seeing improved productivity today and expect to see that continue. We are continuing our aggressive trouble reduction program as well as developing plans to reduce rework.

EXPLANATION OF MISSED SERVICE STANDARDS FIRST QUARTER 1999

DATA MONTH: FEBRUARY 1999

MISSED OBJECTIVES BY EXCHANGE:

SCHEDULE 18	SCHEDULE 17	SCHEDULE 11	SCHEDULE 11	SCHEDULE 2
SERVICE ORDER	REPAIR	OOS/24	NOS/72	COMPLETED
APPOINTMENTS	APPOINTMENTS	HOURS	HOURS	ORDERS
BRADENTON CLEARWATER HAINES CITY LAKE WALES LAKELAND NEW PORT RICHEY PLANT CITY SARASOTA ST PETE TAMPA VENICE WINTER HAVEN	NONE MISSED	NONE MISSED	NONE	BARTOW BRADENTON CLEARWATER ENGLEWOOD FROSTPROOF HAINES CITY HUDSON INDIAN LAKE LAKE WALES LAKELAND MULBERRY MYAKKA NEW PORT RICHEY NORTH PORT PALMETTO PLANT CITY POLK CITY SARASOTA ST PETERSBURG TAMPA TARPON SPRINGS VENICE WINTER HAVEN ZEPHYRHILLS

SCHEDULE 18

We are reinforcing with our contact personnel and field technicians that appointments must be typed in the correct system format and that the arrival time must be entered on the order.

SCHEDULE 2

Due to a report system problem, we believe the reported results do not accurately reflect the service results for this period. After significant system and programming analysis, we believe the reporting issue is resolved and will be reflected in the April results.

Action plan: Escalate reinforcement training with both the field technician and contact reps on appointment information requirements.

EXPLANATION OF MISSED SERVICE STANDARDS FIRST QUARTER 1999

DATA MONTH: MARCH 1999

MISSED OBJECTIVES BY EXCHANGE:

SCHEDULE 18	SCHEDULE 17	SCHEDULE 11	SCHEDULE 11	SCHEDULE 2
SERVICE ORDER	REPAIR	OOS/24	NOS/72	COMPLETED
APPOINTMENTS	APPOINTMENTS	HOURS	HOURS	ORDERS
BARTOW BRADENTON CLEARWATER HAINES CITY LAKE WALES LAKELAND PLANT CITY SARASOTA ST PETE TAMPA VENICE WINTER HAVEN	NONE MISSED	POLK CITY	NONE	BARTOW BRADENTON CLEARWATER ENGLEWOOD FROSTPROOF HAINES CITY HUDSON INDIAN LAKE LAKE WALES LAKELAND MULBERRY MYAKKA NEW PORT RICHEY NORTH PORT PALMETTO PLANT CITY POLK CITY SARASOTA ST PETERSBURG TAMPA TARPON SPRINGS VENICE WINTER HAVEN ZEPHYRHILLS

SCHEDULE 18

We are reinforcing with our contact personnel and field technicians that appointments must be typed in the correct system format and that the arrival time must be entered on the order.

SCHEDULE 2

Due to a report system problem, we believe the reported results do not accurately reflect the service results for this period. After significant system and programming analysis, we believe the reporting issue is resolved and will be reflected in the April results. Specifically, during the period of March, our due date manager system was quoting 3-day commitments or less.

Action Plan: Continued emphasis with contact and field employees on appointment procedure.



Global Atmospherics, Inc.

2705 East Medina Road # Tucson AZ 85706-7155 # Telephone 520.806.7300 # Fax 520.741.2848 # Toll Free 600.283.4557

Archive/Flash Report

April 5, 2001

Russ Diamond
Verizon/GTE Telephone Services
Mail Code FLTC0023
201 N. Franklin St.
Tampa, FL 33602

Dear Mr. Diamond:

Thank you for using Global Atmospheric's archive service. Data from the National Lightning Detection NetworkTM was analyzed for your requested search time and region. A summary for 1995-2000 is included on the next page.

Reference Number:

SO-2542

Report Details:

Requested By:

Russ Diamond

Search period:

March 1, 2001 00:00:00 EST

To:

March 31, 2001 23:59:59 EST

Location Region:

Six Florida Counties: Hillsburough,

Manatee, Pasco, Penellas, Polk,

and Sarasota

Resuits:

March 2001: 8,929 strokes

If you have any other questions about your report, please call me at (800) 283-4557.

Sincerely,

William Brooks



Table 1: Stroke Counts Per Month And Year.

	1995	1996	1997	1998	1999	2000	2001
Jan	1,387	2,421	899	2,367	7,167	6	256
Feb	2.580	2,593	8	17,924	633	408	64
Маг	3,230	11,157	503	20,022	921	1.434	8,929
Apr	680	5,067	31,609	624	6, 360	1,245	
May	11,601	28,633	19,894	8,478	57 .769	2,812	
Jun	34,098	124,488	100.354	66,497	117,731	98,444	
Jul	94,610	49,214	189.176	91,769	109,509	136,800	
Aug	65,826	92,140	79.731	129,443	101,882	87,788	
Sep	31,496	40,548	26,472	34,809	23,486	48.082	
Oct	11.242	722	20.929	3.048	4,318	391	-
Nov	2,408	378	3,349	43	44	3,328	-
Dec	397	4,691	3,761	2	0	98	
Totals	259,555	362,052	476,685	375,026	429,820	380,836	



Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-12 FPSC Exhibit No.

April 20, 2001 Page 1 of 21

INTRACOMPANY CORRESPONDENCE

GTE Telephone Operations

Reply To

FLTC0100 Tampa, FL

February 17, 1998

To:

M. L. Keith - HQEO4B51 - Irving, TX

Subject:

WEATHER UPDATE

Red, at least we made it through the Classic (by minutes!), but once again we have felt the effect of El Nino. After yesterday's and last night's heavy storms, the trouble count this morning is 5887 and climbing. The hardest hit areas were St. Petersburg and Tampa. The Tampa Bay area received anywhere from three to seven inches of rain across Hillsborough, Pasco, Polk and Pinellas Counties. With this rain, we had widespread flooding, tornados and extremely high winds. (See attached newspaper article.)

As of this morning, all Coastal Flood Watches and Warnings have been canceled. However, a River Flood Warning remains in effect for the Alafia, Hillsborough and Little Manatee Rivers. All are expected to reach flood stage today, February 17, 1998.

The established rainfall record for February was broken last night at Tampa International Airport where we have recorded 8.19 inches of rain through 7:00 a.m., February 17, 1998. The previous record was 7.95 inches of rain set in 1963.

We were starting to make headway and some improvement in our out-of-service/24 hours. We started Monday morning at 94.3% (this was as of Sunday, February 15th), with the FPSC objective at 95%. I know this latest round of storms will hurt this effort.

We have required a ten-hour day across the Region and we will continue to evaluate trouble levels and potentially declare a service emergency effective tomorrow.

M. L. Keith February 17, 1998 Page 2

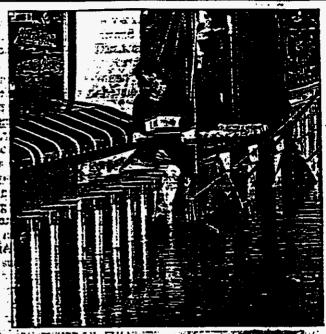
The CARE Center has been in an express mode since yesterday morning and there is a good possibility they will remain in that mode throughout today. We have moved all IP contractors that can shoot trouble to help with the high trouble levels. Defaults have been pushed out in all areas for NOS and OOS trouble. We are utilizing tappers to reduce as many field dispatches as possible.

The next round of storms is expected Friday . . .

Peter A. Daks Regional President-Florida

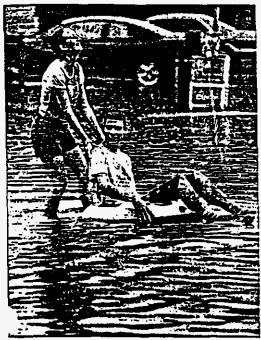
PAD:bam Attachment







Evi Craig, above assivages a photo aixum, along with thop right, sits at a midway game booth at other thems; in her living room; after a tomado ewept wester at the Floride State Fall. The place through her Polk County magnituding of the west



PHIL SHEFFIELD/Tribune photo Frances Totton heips Billy Hamblin float through a south Tampa intersection.

TAMPA — A tomado, gobs of rain and high winds continue a pattern of miserable weather for the Tampa Bay area.

By PETER E. HOWARD TOM BRENNAN and ROB SHAW of The Tampa Tribune

The latest winter storm spawned a damaging tornado in Polk County and brought torrential rains that helped undermine a section of Interstate 4 Monday, paralyzing west-bound traffic and leading to a 12-mile backup.

Both Polk and Pasco counties were ripped by high winds — at least five Polk homes were damaged by a tornado — and some Tampa Bay area neighborhoods were peited with up to 5 inches of rain as a stubborn low-pressure system continued its assault on a swath of Florida stretching from Sarasota to Gaines-ville.

"The whole house shook after it hit," said Polk County resident Bar-

bara Gordon, who was in her Crooked Lake home with her 12-year-old son, Eric, when the tornado hit her house and tore off roof tiles and destroyed front and back porches.

Flood watches remained in effect for area rivers, as well as coastal areas that could suffer additional beach erosion as winds shift to the west today.

The Florida State Fair closed its midway rides early Sunday and Monday because of the rain, and numerous neighborhoods weathered flooded streets, stalled cars and drenched pedestrians.

Skies are expected to clear a bit for the next few days, but the rain should return Friday. High temperatures are expected to be in the low 70s, with overnight lows ranging from 50 to 55 degrees.

Once again, chalk it up to El Ni-

"Basically it has sort of affected

See WEATHER, Page 9 ▶

VEATHER/Storm dumps high winds, rain on Bay area

From Page 1 Control

e upper level wind pattern, and orms are tracking farther south an normal," said Richard Rude, meteorologist with the National eather Service in Ruskin.

Tampa got nearly 4½ inches of in as of 5 p.m. Monday, with the tal for the month surpassing 7 ches — more than twice the rmal amount for February.

Since December, the area has en hit with more than 27 inches rain, more than half of the typil total for a year.

On Monday, the deluge ought things to a crawl in east-n Hillsborough.

Interstate 4 westbound was used for about three hours Mony after workers discovered conete slabs of roadway were moverater being undermined by rain

orkers used quick-setting nerete to keep sections of the ad from washing away.

State transportation officials id voids under the slabs were scovered about noon near the inresection with U.S. 301. Workers d been boring under the paveent for the past two weeks to inill drainage and utility pipes, id John McShaffrey, a spokesin for the Florida Department of ansportation.

Water seeping through the res probably undermined the ad, McShaffrey said.

One lane was closed around on, with the second lane closed minutes later. Traffic was diverted for about a quarter mile off I-4 along the slip ramps and frontage road leading to Hillsborough Avenue.

Thousands of motorists were caught in the backup, which stretched for 12 miles to just west of Plant City. The highway reopened about 4:30 p.m.

In southern Polk County, at least five houses around Crooked Lake were damaged by a tornado that surfaced about 2:30 p.m. No injuries were reported.

Roofs were blown off, windows smashed and boats and debris were strewn across yards. Other boats were left capsized in the water. Pine trees and power line were knocked down.

Evi Craig was in her house alone on North Crooked Lake Drive and heard it coming.

"It makes a weird noise as it goes through the screen," Craig said.

She barricaded herself in a bathroom and waited through the 10 seconds or so she estimated it took for the tornado to blow through. It damaged her porch and blew out windows on the south side of her house.

Outside, a neighbor's roof was thrown onto Craig's two cars in the driveway, and the tornado deposited a boat on her porch. In Pasco County, two 100-foot trees snapped off in front of the San Antonio house belonging to Bill Didier, blocking the front door but missing the house.

No one was home, and no one in the area reported seeing a funnel cloud. But tree damage north and south of San Antonio was in a consistent path aligned with the Didier home.

"We wanted to open it up a bit to get a better view of the sky, but not this much," said Didier, inspecting the thick, toppled oak and cedar trunks that blocked his front door.

A coastal flood warning remained in effect Monday from Manatee County north to Jefferson County. High winds overnight were expected to push an additional 2 to 4 feet of water onto Gulf of Mexico beaches, perhaps causing minor coastal flooding.

Those high winds also could result in additional beach erosion, which would be more bad news for areas already battered by other storms this winter. While winds were from the southeast Monday, they were expected to switch around to the southwest or west today.

Many areas — particularly
Upham Beach on St. Pete Beach
— have been pounded by high

winds and waves in recent week Federal officials last week announced a \$22 million beach res toration project to take place along some Pinellas beaches late this year.

A flood watch was in effect i much of the west coast of Floric and frequent downpours prompt the National Weather Service to issue an urban flooding advisory for Pinellas, Pasco, Hernando ar Citrus counties.

Rainfall amounts of 2 to 4 inces were common across the Tar pa Bay area Monday, weather so vice officials said in the late after noon.

Hillsborough officials braced for additional rain, and preparations were under way to get she ters ready if needed.

"We are just waiting to see what is going to be dumped on us," said Nance Schapira; a spokeswoman for the county's emergency planning department adding that there has been a steady demand for sandbags but no other major problems.

"Things are going to get a kt worse before they get better," said Steve Valdez, the county's community affairs director, "but so far we are holding our own." Staff writers Staphen Thompson, flit Thompson and Greg Fight contribute to this report.

Docket No. 991376-TL Rebuttal Testimony of John A. Ferreli Exhibit JAF-12 FPSC Exhibit No. April 20, 2001

FROM THE DESK OF . . . PETE DAKS

June 29,1998

To: M.L. Keith - HQEO4B51 - Irving, TX

This note is a follow-up to the note we sent you Friday concerning high trouble counts.

Today we are starting with a total trouble count of 1692 (945 Inland and 747 Coastal). We made good progress over the weekend even with severe thunderstorms on Saturday afternoon. The trouble default in both divisions are at 10:00 and 11:00 a.m., and we hope to push that out today depending on how trouble comes in today.

Through Sunday our OOS over twenty-four is at 94.3 % with the PSC objective of 95%. As we said on Friday, Tampa and St. Petersburg were hit the hardest and the two larger exchanges impacted us the most.

We have moved all cable splicers back to IP in fact many were released back at the end of the workday on Friday. Overtime is being monitored closely as well as defaults and schedules.

As a result of the holiday this week and the first of the month service order activity is high.

The weather forecast for today calls for afternoon thunderstorms (you know the drill).

If you need additional information, please let me know.

PAD:cir



NETWORK SERVICES

Docket No. 991376-TL Rebuttal Testimony of John A. Ferrell Exhibit JAF-12 FPSC Exhibit No. _____

April 20, 2001

INTRACOMPANY CORRESPONDENCE

Reply To FLTC0100 Tampa, FL

July 15, 1998

To:

M. L. Keith - HQE04E52 - Irving, TX

Subject:

WEATHER UPDATE

Red, our weather pattern has continued with thunderstorms yesterday afternoon and evening, and throughout the night. The thunderstorms and heavy rains are continuing this morning and predicted to continue throughout the day, moving in off the Gulf and across the Tampa Bay area this morning. Predictions are rainfall amounts of one to two inches in less than an hour are likely.

In the last twenty-four hours, the Inland Division has received in excess of two inches of rain and some areas in the Coastal Division received in excess of three-and-a-half inches of rain.

At 10:30 this morning, we had 5082 total cases of trouble (3517 in Inland and 1565 in Coastal). We have moved 110 cable splicers and contractors over into the Inland Division to shoot trouble, and 48 into the Coastal Division. We are continuing to work ten-hour days, and have required some lay days.

Out-of-service defaults remain at 10:00 and 11:00 a.m., same day for out-of-service. Not-out-of-service has been pushed to day two in Inland and remains standard in Coastal. We will continue to monitor this very carefully.

I will continue to keep you posted.

Peter A. Daks

Regional President-Florida

PAD:bam

Attachment #1

DETAILED WEATHER STATISTICS

Rainfall for 1997 for the following locations:

Tampa International Airport	67 .71"
St. Petersburg	70.14"
Sarasota	62.89"
Ruskin	72.87"
Lakeland	57.41"
Winter Haven	50.26"

Most rain in 24-hour period was 8.45" on September 26/27, 1997.

March through May, we had 6.43" of rain above normal for spring. For the fall, September through November, we had 10.68" of rain above normal.

For the year - we were 23.79" above normal.

Wettest month in 1997 - December with 15.57" of rain. Driest month in 1997 - February with .66" of rain.

We experienced the wettest April on record - 10.71". (The historical record was 8.82" in 1854.)

The wettest December (or any winter month) - 15.57". (Average rainfall for December is 2.15". Previous record high was 8.90" in 1888.)

Monthly records for 24-hour rainfall were set:

April - 5.44" on April 26 September - 8.45" on September 26/27 December - 4.76" on December 26/27

There were 21 days with more than 1" of rain in 1997, 7 days in December alone. Normally, there are only 13 such heavy rain days in a year.

We had 64 days with thunder and lightning, 120 days with rain (including trace).

Attachment #3

Docket No. 991376-TL Rebuttai Testimony of John A. Ferrell Exhibit JAF-12 FPSC Exhibit No. April 20, 2001 Page 9 of 21

from the desk of

Larry Yost

January 6, 1998

Pete.

Per your request, attached is a study on manpower requirements and weather data related to the effects of "El Nino."

This information was compiled using the best information we had at the time on potential rainfall as well as historic data.

If you have any questions, please call,

Larry

EL NINO WEATHER / MANPOWER FORECAST

The purpose of this report is to address the additional Customer Operations manpower requirements that may be necessary as a result of severe weather related to the phenomenon called "El Nino." Florida has put together a plan that provides for incremental increases in manpower that can be devoted to handling a large influx of repair tickets that are normally associated with severe weather.

By January 7, 1998, one hundred (100) Installation and Repair Contractors will be made available to provide an immediate source of manpower for Customer Operations. We currently have approximately one hundred (100) open requisitions that are in the process of being filled. As they fill these requisitions, the contractors can be reduced or moved over to Infrastructure Provisioning.

Along with these aforementioned contractors. IP currently has eighty (80) hourly contractors that can perform service emergency type work. IP is also in the process of bringing an additional forty (40) contractors to support the Capital Program. This would result in a total addition of 120 contractors that would be available on January 7, 1998, that could be shifted to Customer Operations in the event of a Service Emergency.

IP currently has one hundred & forty seven (147) contractors performing unit contract work. Of these 147, we estimate that about forty (40) of these contractors would be capable and willing to work trouble reports in this endeavor.

This would bring our total available contractor work force to two hundred and sixty (260) (100 BAU contractors plus 160 from IP). The Service Emergency we are now addressing is being staffed with an additional 250 technicians. As you can see, this plan would provide ample coverage in most abnormal repair situations.

In the rare case of an extreme severe weather situation, there is another two hundred (200) IP GTE hourly splicing technicians that could be utilized.

By adding the 100 contractors and using the 160 contractors from IP, there would be a limited interruption to the Capital Program. If we need to use the two hundred (200) GTE Hourly personnel from IP, the Capital Program would virtually be stopped.

There is a concern that by adding the additional headcount which has been stated at a maximum of 460 would cause a potential problem in the proper dispatch of the work force.

An analysis of dispatches, rainfall and predictions for first quarter of 1998 are attached to this report.

SUMMARY

In addition to the current workforce, below is a list of additional resources that will be available in January 1998:

Customer Operations Additional Hourly Contractors (Will be available on January 7, 1998)	100					
Note: These contractors will be added to handle BAU activity until vacancies are filled.						
I.P Houriy Contractors	80					
I.P Unit Contractors	40					
I.P Additional Houriy Contractors	40					
(Available on January 7, 1998)						
,, ., ., ., ., ., ., ., ., .,						
Total Available without declaring a Service Emergency	260					
IN CASE OF SERVICE EMERGENCY						
I.P. Company Technicians	200					
TOTAL AVAILABLE RESOURCES	460					
Projected Total Troubles that can be cleared per 8 hour day						
(Four troubles / person @ 260 employees)	1040 troubles					
(Four troubles / person @ 460 employees)	1840 troubles					

Expense associated with additional 100 contractors is approximately \$300,000 per month for the next three (3) months.

The Expense Cost of a Service Emergency is approximately \$100,000 per day.

Starting on January 7, 1998, we will have access to 260 contractors which is 140 more contractors than we currently have today. A weather situation severe enough to require the need to invoke a Service Emergency should be rare based on the weather data we have available today.

папри. чро

ANALYSIS OF DISPATCHES TO RAIN FALL AND PREDICTIONS FOR 1098 TOTAL AVERAGE 1996 1996/1997 1997 ACTUAL AVERAGE AVERAGE AVERAGE PROJECTED MONTH ACTUAL ACTUAL **ACTUAL** DAYS OF AMOUNT OF RAIN AMT DISPATCHES AMOUNT OF RAINFALL TAS RAINFALL RAINFALL DAYS OF RAIN PER BASED ON RAIN PER RAIN WG 1 & 4 See note 1 See Note 2 RAIN DAY RAIN DAY 200% OF AVG. RAIN See note 3 See note 4 96 NOV 42529 See Note 5 0.77 0.91 3 1.77 0.35 96 DEC 47710 211 2.15 3.28 6 6 0.36 97 IAN 50941 5.97 1.32 5.42 1.99 7 0.28 6 0.22 97 FEB 40211 0.65 3.04 7 9 24 3.08 0.44 6 0.11 43966 9.03 **97 MAR** 1.91 4.65 5 0.38 3.01 7 0.4397 APR 53581 7.98 4.20 5 9 0.891.15 0.2397 MAY 47755 1.53 1.45 0.52 4 0.38 3.10 6 97 JUN 54570 8.96 4.68 10 0.47 5.48 12 0.46 97 JUL 68783 6.02 2.72 21 6.58 16 0.29 0.41 97 AUG 56093 5.81 7.39 13 0.45 7.61 17 0.45 97 SEP 53449 5.44 11.16 9 1.24 5.98 13 0.46 97 OCT 57576 5.54 3.12 0.79 2.02 7 7 0.2997 NOV 61733 5 0.35 4.44 0.91 5 0.89 1.77

82955 See Note 6

NOTE:

97 DEC

1. All Actual Rainfall Information is based on the average of nine districts from Business Analysis, except for Dec. which is from Tampa Airport.

Note: In October, Lutz had 9.8 inches of rain, and in November, Tarpon Springs and Sarasota/Bradenton had 6.95 & 7.32 inches respectively.

2.15

6

0.36

2. 1996 Rainfall information is from Tampa International Airport only

15.57

3. Average of Monthly Rain Fall is based on a 30 year Study Period (Includes previous "El Nino" years)

2.11

- 4. Average number Days of Rain per Month is based on a 49 year Study Períod of .01 inches or more. (Includes Previous "El Nino" years)
- 5. The percent of projected amount of rain is based on local meteorologists.
- 6. Dispatch Information is from Business Analysis.

Page 13 of 21

disaster

WASHINGTON — Four counties stricken by storms, including Hillsborough, are declared federal disaster areas, making aid available to those affected.

By PHIL WILLON of The Tampa Tribune

President Clinton on Tuesday declared Hillsborough and three other Central Florida counties federal disaster areas in the wake of storms that tore through the region during the Christmas season.

The president's declaration makes federal grants, disaster housing, low-interest loans, food stamps and crisis counseling available to people affected by the storms, including uninsured property and business owners.

Polk, Hernando and Osceoia counties also are covered by the deciaration.

On Dec. 27, a tornado with winds exceeding 113 mph ripped through Polk County, destroying up to 75 homer and injuring 18 people. The twister thrashed middle school in Haines City, causing an estimated \$1 million in damage.

The Tampa Bay area was drenched by torrential rainfall beginning Christmas Day, with storm fronts dumping as much as 7 inches of rain on Apollo Beach, Largo and Citrus Park and causing flooding throughout the region.

U.S. Reps. Jim Davis. D-Tampa, and Karen Thurman, D-Dunneilon, said they were relieved to see such a quick response by the federal government. Florida Gov. Lawton Chiles, who requested the declaration, also praised the president's rapid response. "It's a critical step to getting neip to people who are really in need." said Chiles spokesman Ryan Banfill.

Chiles blamed the storms on the weather phenomenon ri Nino, which he said has caused more than \$25 million in damage in Florida in the past year. El Nino is caused by the warming of Pacific Ocean currents off the coast of Peru, which affects weather by scrambling normal upper-level wind patterns.

Residents and business owners who suffered losses can begin applying for assistance today by calling 1-800-462-9029. For people hearing and speech impaired, the number is 1-800-462-7585.

Officials assess tornado damage

HAINES CITY — Federal and state workers will begin evaluating damage today from a weekend tothado in Polk County.

By BILL HEERY and BETH FOUSHEE of The Tampa Tribune

Students at a Haines City school will have to relocate to a technical center about three miles away when classes resume Ian. 6.

The 900 Boone Middle School students will have to hold class at Ridge Technical Center in the northeastern tip of Winter Haven for an undetermined amount of time until \$1 million in tornado damage is repaired, school officials said Monday.

Repairs are likely to take at least six weeks, officials have said.

County workers used heavy equipment Monday to smash the remains of 11 portables destroyed by Saturday's storm.

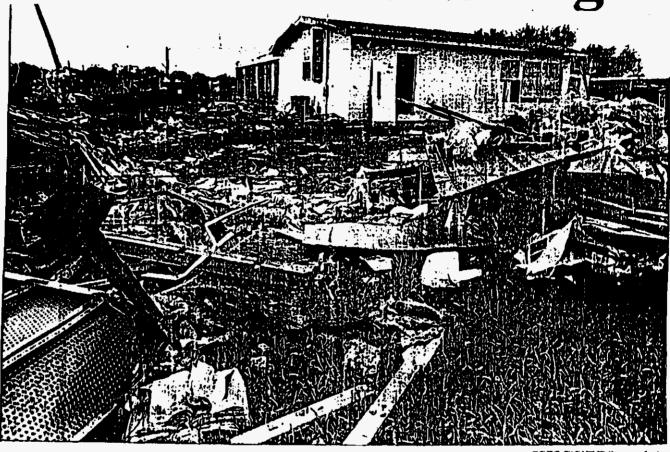
The southeastern portion of the school was worst hit. The media center's roof was partially dismantled. At least 7,000 books were destroyed, media specialist Linda Glockner said Monday as she sifted through the aftermath.

The adjoining computer lab was ruined, with all 33 computers destroyed, asid Glockner.

Federal and state emergency officials will arrive in Polk this morning to begin assessing damage from Saturday's tornado and determining the county's eligibility for federal disaster relief.

Polk emergency officials on Monday reported 75 homes destroyed in the Winter Haven, Lake Hamilton and Haines City areas. That estimate came immediately after the storm and probably will be reduced following cleanup, said Tom Mason, Polk's emergency operations manager.

Another 75 to 100 homes suffered major damage, and about 100 homes"



GREG FIGHT/Tribune photo

Portable classrooms were destroyed and debris strewn across the ground after an early morning tornado struck Shelley S. Boone Middle School in Haines City Saturday.

federal criteria in designating a home as destroyed for purposes of establishing the level of federal disaster relief for which the the county may qualify.

Representatives of the Federal Emergency Management Agency and the state's Division of Emergency Management will attend a briefing this morning and then go to the affected areas, Mason said. The assessment could be completed by the end of the day, he said.

If a disaster is declared, eligible residents and businesses could apply for low-interest loans, grants for tem-

The tornado first touched down shortly before 4 a.m. Saturday in the Dinner Lake/Jan Phyl Village area southwest of Winter Haven and traveled northeast through Haines City.

The twister was classified as an F-2 storm, which means it had wind speeds between 113 and 157 mph, Mason said. Such storms are classified from F-0 to F-5, with F-0 being the least severe, he said.

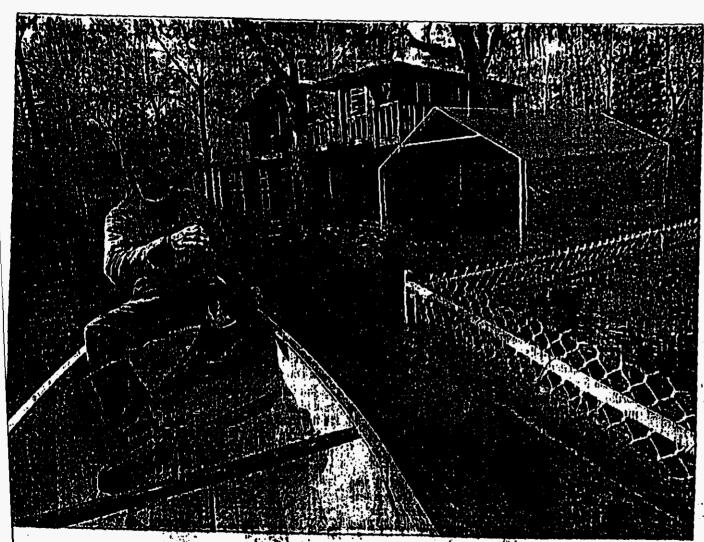
Also Monday, flooding from heavy rains the past two weeks continued to be a problem in the Rock Ridge Road and Deen Still Road area northwest of

flooded, but there were no reports of people being trapped by the water.

Emergency officials also will assess the flooded areas for disaster relief, Mason said.

To help storm victims, the Red Cross is accepting donations of clothing and household items at the First Baptist Church in Haines City, 2250 State Road 17 S.

Money can be given by sending 'checks made out to the American Red Cross Disaster Relief Fund to the nearest Red Cross chapter, or by calling 1-800-HELPNOW



BOB CROSLIN/Tribine pirotos

n Natiress paddles through the front gate of his cae and RV park on the Withiacobeles River in cooches. The first floor of Natiress' house is under 4

feet of water. The river is expected to rise again tonight and is not expected to recede within its banks until February.

Family flooded 3rd time

By DARLENE McCORMICK of The Tampa Tribune

After 15 years, Nanci Chadwick's thirst for life on the river has run dry.

She knew it around 8 p.m. Sunday when the Alasia River inched ever higher—about 5 feet above flood stage—and crept into her doublewide mobile home.

She and her husband, Joe, had prepared by boxing up their belongings and hoisting them onto beds or any place off the floor. They readied their cance for escape.

Still, she was afraid as the water swirled around their home, wetting the carpet with about 2 inches of water.

It was the worst she had seen since the flood of 1988. It was the third since her property on Jessi Lane in Lithia has flooded in the past two months.

"I would really like to move," she said Monday. "I don't mind the canoeing ... but this is getting a little bit ridiculous. It's just happening too often."

See STORMS, Page 2 f

000128

nt his father

boy shot his father in ning while trying to protect ies said.

eriff's Office deputies re-

eriff's Office deputies recall at 204 E. Keysville crious condition at a local

eg Brown would not identiase will be referred to the etermine if charges will be

drug sweep

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he suspects after homing r were told were hot St. Petersburg Police De-Chief Gary Hitchcox. eople for whom warrants torn area on the south Mayor Dave Fischer for

5 of the 70 had been arilla Davis said.

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as a white man with ot 10 inches tall and

e and blue license plate, ities said.

ccident

old Clearwater woman ck near Clearwater Mail

as dead at the scene, ac-• Department spokes-

on Seville Boulevard and i Chevrolet, police said. ar was not seriously in-

From Page 1

Chadwick was just one of many trying to recover from record rainfalls, storms and flooding that has dogged Hillsborough, Polk, Pasco and Pinellas counties for the past two weeks.

Severe weather, including a tornado in Polk County, has damaged more than 600 buildings, according to the state Department of Community Affairs.

Nance Schapira, spokeswoman for Hillsborough County Emergency Management, said teams are still assessing damage.

In Pasco County, flooding caused by weekend rains appeared mostly minor, but Pasco County's Office of Disaster Preparedness was still assessing damage.

"We have flooding everywhere, which is why it makes it so hard to assess," director Michele Baker said Monday. "We don't think there were a whole lot of people flooded out."

One family along Elfers Parkway and two on the county's east side evacuated over the weekend as a precautionary measure. Baker said.

Floodwaters were mostly receding Monday, Baker said.

Pasco residents who have experienced flooding are asked to cail (813) 847-8110 or (352) 521-5179 to describe the flooding impact. County damage assessment teams will follow up with those reporting problems, Baker said.

Rainfall slows recovery from widespread flooding

On Monday, the federal Small Business Administration released a statement declaring Hillsborough County and surrounding areas a disaster area caused by flooding Dec. 12-14.

The SBA Disaster Outreach Center at the University Community Resource Center, 13705-A N. 23rd St., is open to assist eligible people with low-interest loans.

Help also could be extended to those hurt by Christmastime flooding and rains. Federal officials will join state and local emergency officials in the area today and Wednesday, Schapira said.

"Some of the water is going down; it's just very slow," she said of flooding in Hillsborough County. Areas around Lutz, the University of South Florida and Lithia were hit hard

The Corpus Christi Catholic Church parish center at 9715 56th St. in Temple Terrace offered shelter to 18 people Sunday night, said Janet McGuire, spokeswoman for the local chapter of the American Red Cross. In Hillsborough, those needing assistance can call the Red Cross at (813) 251-0921.

The shelter remained open Monday night, she said.

The National Weather Service in Ruskin issued a wind-chill advisory for Monday night and a coastal flooding watch until today.

Meteorologist Rocky Pelatti said rivers in Hillsborough crested Sunday night or Monday morning.

The Alafia River was receding as of 10 a.m. Monday. The Little Manatee River showed signs of retreat as of 7 a.m. Monday, he said.

The insurance industry is reminding residents of the need for flood insurance, which takes 30 days to take effect.

"We are just concerned that this is going to be a very bad winter," said Sam Miller, vice president of the Florida Insurance Council, a trade group. He said the Polk tornado points out that "El Nino is going to cause this to be an incredibly severe winter."

El Nino, which kept down the number of Atlantic storms during the last hurricane season, is expected to cause more intense tornadoes with more rain this winter. Saturday's was the state's second major tornado of a new season.

Darlene McCormick covers law entorcement in Hillsborough County and can be reached at (\$13) \$15-4551. Staff writers Cheryl Jackson and Andy Gottleb contributed to this report.

TITANIC/Museum's exhibition packs them in

◆ From Page 1

the exhibit, Sarah said. "It made it more interesting."

Dolly Bufter said the exhibit's galleries, built to look like different parts of the ship, made the show come alive.

Jim Carson, 64, of San Diego waited about 45 minutes to get into the exhibit. He had tried calling to reserve tickets but couldn't get through. Still, he said, the show

the museum Monday trying to fix the lines. Atherholt said calls to the exhibit's toll-free number appeared to have overwhelmed the system.

Atherhoit said museum operators were trying to manually handle all calls, including those coming into the main museum number, until the telephone system is repaired.

He said most people without reservations were waiting about

handing out candy and newspapers to help make the wait more enjoyable.

Crowds should drop drastically after this coming weekend, he said.

Peak times are between 11 a.m. and 4 p.m. To avoid a wait, Atherholt suggests visitors reserve tickets or arrive between 9 and 11 a.m.

Verbleen Resmen covers Pinelies

Damage estimate, rivers rising

HAINES CITY — Polk County crews go door-to-door to assess damage and rivers in Hillsborough County are on the verge of cresting.

By CANDACE J. SAMOLINSKI and DARLENE McCORMICK of The Tampa Tribune

Damage estimates continued to rise Sunday in Polk County as local emergency management crews tried to help residents cope with Saturday's early morning tornado.

The crews had to go door-to-door in some areas trying to get an accurate count of the number of homes destroyed, said Jill Weinischke, spokeswoman for Polk County Emergency Management.

We look outside, and all you see is water, water, water,

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Anne Harrison

"There are several areas where the roads are impassable, and we have people walking in order to check each house." she said Sunday afternoon.
"So far, the latest update showed 100

homes completely destroyed, and 150 more received substantial damage."

Early this week, federal officials will join state and local emergency officials to assess damage in North and Central Florida. Severe weather has affected more than 600 structures, according to the state Department of Community Affairs. If a disaster is declared, eligible Florida residents and businesses could apply for low-interest loans, grants for temporary housing, food stamps and crisis counseling.

On Sunday, relief workers in Hillsborough and Pinellas counties contin] THE TAMPA TRIBUNE [MONDAY, DECEMBER 29, 1997



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FPSC Exhibit No.



CANDACE C. MUNDY/Tribune photos from Eagle 6

Impassable roads have hampered Polk County emergency personnel. On Saturday, a tomado ripped through this neighborhood near Haines City and Lake Hamilton.

Jill Weinischke, spakeswoman for Polk County Emergency Management, said about 100 homes have been destroyed and 150 more suffered substantial damage.

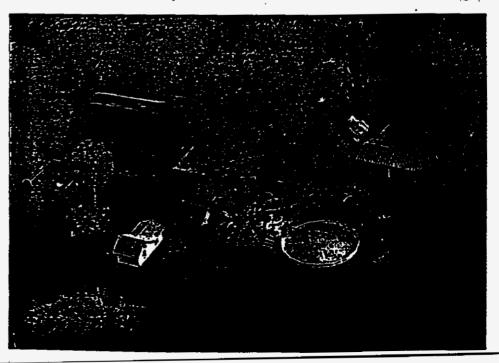
Manatee River will follow suit, cresting 4 or 5 feet above flood stage at Wimauma. The Hillsborough River peaked on Sunday, 4 feet above its banks at Hillsborough River State Park, according to the National Weather Service.

Blustery weather and a chance of more rain were forecast for today. As of midnight Saturday, 15.38 inches of rain had fallen at Tampa International Airport this month, making it the wettest December in history.

The National Weather Service in Ruskin predicted a chance of showers today, compliments of a fast-moving low-pressure system skimming across Florida.

The good news is the dry, cool weather aiready in place will help ward off any thunderstorms, said meteorologist Waylon Collins.

In Polk, the heaviest damage occurred at Lake Region Village, a mobile



FPSC Exhibit No.___

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Fishermen spend Christmas adrift

in Associated Press report

NVERNESS - Three fishermen spent Christmas adrift in the Gulf of Mexico in heir 22-foot disabled boat, eating Twinties, and used a homemade sail and manlower to get themselves to safety.

For 26 hours, they paddled and pulled he boat — two of them going overboard a shallow water to pull it. The ordeal

ended Thursday morning when they reached the mouth of the Crystal River.

Hubert D. Coleman, 47, Tony Foreili. 40, and Orlin Brokenshire, 40, all of Hernando County, left Fort Island Gulf Beach Wednesday morning in search of grouper.

They went about 25 miles into the Gulf of Mexico, but ran into a storm and turned back. Coleman said. But about 5

miles from shore, their V-8 motor died.

Without a radio or cell phone, they used a tarpaulin as a makeshift sail, Brokenshire said.

The Coast Guard began searching for them when they didn't return at 6 p.m. Christmas Eve as expected.

In the morning, they paddled two miles to the entrance of Crystal River.

STORM/Polk County picks up the pieces after storms

◆ From Page 1

ake Hamilton and in parts of Vinter Haven. However, many esidents in North Lakeland were onfined to their homes because of ooding.

"We look outside, and all you is water, water, water, water." said one Harrison, speaking from her ome in the Rock Ridge Road area? Lakeland. "The only way we in get out is to wade through the ater, but it's up to my knees and mafraid of what's living below it surface. I hate snakes, so I'm aying put."

Twelve secondary roads were used in the Rock Ridge area of orth Lakeland. Weinischke said.

"But we are also having probms with roads being washed 'ay," she said. "There was some ad work done recently, some liverts put in, but the work was new and these were washed t by the high waters."

Residents left homeless by the orm also faced chilling temperates in the low 40s Saturday tht and Sunday morning. Ameri-

can Red Cross officials said Polk County residents were refusing to go to shelters.

"We had two shelters, one in Eagle Lake and the other at East-side Elementary in Haines City, open Saturday, but we housed zero residents," said Georgianne Cherry, emergency services director for the Red Cross in Winter Haven. "The problem is people are afraid to leave their belongings."

The Red Cross hoped to solve the problem by setting up shelter inside the affected area Sunday night at First Baptist Church, 2250 U.S. Alternate 27 S., Cherry said, The Eagle Lake and Eastside Elementary shelters were closed.

The Haines City Police Department and Polk County Sheriff's Office stepped up patrols in the areas, said sheriff's spokeswoman Sonva Dodds.

To report home damage, contact Polk County Emergency Management at (941) 534-3021. For Red Cross assistance, call (941) 294-5941.

Heavy rains that ended Satur-

day caused widespread urban and river flooding in Hillsborough County.

In Citrus Park, road crews tried unsuccessfully to patch up Del Valle Road Saturday night. The rain-soaked asphalt collapsed when one resident drove his pickup into the neighborhood.

About 30 families remained trapped inside their subdivision early Sunday after filler used by road crews washed away during the night, said Hillsborough County Sheriff's Office Deputy Robert Millican.

In eastern Hillsborough County, deputies roamed through flooded areas in four-wheel-drive vehicles Saturday night and Sunday, checking on people in their homes.

Sheriff's Deputy Dan Hillery said residents in the areas of Rose Street and Coconut Cove were experiencing flooding near the Alafia River and Lithia Springs.

Preliminary findings by Hillsborough County Emergency Planning Operations on Sunday show 105 houses, 213 apartments or duplexes. 24 mobile homes, six businesses and a large recreation al vehicle park were affected by flooding. Of the 348 structures, 33 percent were affected by the Dec. 13 flood.

Shelters were opened throug out the area.

In Pineilas County, floodwate crested at Mariner's Cove Mobil Home Park off Ulmerton Road about 3 p.m. Saturday, but residents were still trying to cope with another problem Sunday: no electricity. Electricity could not a turned on until a building inspector checked hookups covered by water.

Those deemed safe will be turned on this morning, said Pine las County Emergency Management Director David Bilodeau.

The flooding in the park was caused when a major drainage canal overflowed from the rain and high tide.

Some of the park's residents, including Broadhead and his wife, Catherine, had to be evacuated by boat.

Staff writer George Coryeli contribute to this report.

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PARTIES SALVANIES AND DESCRIPTION OF

April 20, 2001 Page 20 of 21

The Ground Water Index

The Ground Water Index is designed to provide a quick reference of the overall health of the District's ground-water resources. The three indices coincide with the occurrence of three distinct ground-water basins within the District's boundaries. Each ground-water basin is characterized by the physical and lithological characteristics of the underground rock strata which make up the aquifer systems. In the southern ground water basin, (Hillsborough and Polk Counties and south), the Floridan and intermediate aquifers are confined below thick layers of impervious clay making it difficult for rainfall to penetrate and recharge the aquifers. In the northern ground water basin, (northern Pasco County and north) the intermediate aquifer is nonexistent and the Floridan aquifer is at or near the surface, allowing rainfall to easily recharge the aquifer system. The central ground-water basin, (southern Pasco County, northern Hillsborough County, and Pinelias County), is characterized as a transition zone between the northern and southern ground water basins.

The Ground Water Index is derived by comparing current ground-water levels collected from a regional network of monitor wells located in each ground-water basin against historical levels. Twenty-seven monitor wells were selected for the network because each well has a long period of record with reliable data representative of the surrounding hydrologic conditions. Statistical determination of the Ground Water Index for each of these wells is performed by comparing current levels against the maximum and minimum values recorded for each month of the year. The monthly record high and low for each well, as determined from period-of-record data, are assigned values of 0 and 100, respectively, and the range between them scaled accordingly. The current value is compared to this range to determine the index number. For example, an index of 50 indicates that the current water level in a well is 50 percent of, or halfway between, the full range between previously set monthly high and low values. A regional index is then calculated for each ground water basin by averaging the individual indices for each monitor well within each of the three defined ground-water basins.

If a new record high or low ground-water level occurs, the range between the minimum and maximum values will continue to be 100 units, thus a new record monthly low level results in that well having an index value of "0." Conversely, a new record monthly high level will give that well an Index of "100." For interpretation purposes, the Ground Water Index is qualified as "good" (50 - 100), "fair" (10 - 49), and "poor" (0 - 9).

At the end of November, the Ground Water Index in the northern region was 41, equivalent to an 18-point increase compared to the end of last month. The central region's index of 55 was equivalent to a 27-point increase, while the index in the southern region was 56, equivalent to a 25-point increase, compared to the end of October. Based on these indices, the northern region was classified as "fair," while the central and southern regions were classified as "good."

The Ground Water Index at the end of November 1997 was lower than the November 1996 index in the northern region, while the index was higher in the central and southern regions. In the past 12 months, the index decreased 3 points in the northern region, while the index in the central and southern regions increased 23 and 26 points, respectively.

GROUNDWATER STATUS/INDEX

1997		NORTH	CENTRAL	SOUTH
Oct 6	Monthly Record High	0	0	0
	Monthly Record Low Water Index	1 28	22	1 42
Oct 20	Monthly Record High	0	0	0
	Monthly Record Low	1	1	2
	Water Index	19	24	32
Oct 27	Monthly Record High	0	0	0
	Monthly Record Low	0	0	2 ** .
	Water Index	23	28	31
Nov 10	Monthly Record High	0	0	. 0
	Monthly Record Low	0	0	0
	Water Index	34	49	52
Nov 17	Monthly Record High	0	o	0
	Monthly Record Low	O	0	0
	Water Index	41	5 5	56
Dec 8	Monthly Record High	0		
	Monthly Record Low	0	0	0
	Water Index	50	57	69]
Dec 15	Monthly Record High	3 *	2-	2=
	Monthly Record Low	0	0	0
	Water Index	6 5	81	75