



United Telephone Company of Florida
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August 12, 1991

Steve Tribble, Director
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Florida Public Service Commission
101 East Gaines Street
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**ORIGINAL
FILE COPY**

Re: ~~Docket No. 910060-TP~~

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket please find the original and 15 copies of United Telephone Company of Florida's Post Hearing Comments.

A copy of the foregoing has been furnished to the parties of record as shown on the attached Certificate of Service.

Sincerely,

Alan N. Berg

ANB/prc
Enclosure

- ACK _____
- AFA _____
- APP 1 _____
- CAF _____
- CMU 1 _____
- CTR _____
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08110 AUG 12 1991
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Amendment of Rule 4.110, F.A.C., } Docket No. 81088-91
pertaining to customer billing. } Filed: August 12, 1991

**POST HEARING COMMENTS OF
UNITED TELEPHONE COMPANY OF FLORIDA**

United Telephone Company of Florida (United) submits the following Post Hearing Comments in this phase of this Docket:

1. The Rule changes proposed in this phase of this Docket are found in Florida Public Service Commission (FPSC) Order No. 24477, issued May 6, 1991, the Notice of Rulemaking in this phase of the Docket.

2. The proposed Rule language contained in FPSC Order No. 24477 adds a new section (1)(a) to Rule 25-4.110, F.A.C., and renumbers and reletters the existing sections. The language of the new section (1)(a) contained in FPSC Order No. 24477 reads as follows:

(1) * * * ¹

(a) Charges for 900 or 976 calls shall be segregated from charges for regular long distance or local charges by appearing separately under a heading that reads as follows: "900 or 976 nonregulated charges." The following information shall be clearly and conspicuously disclosed on each page of the bill containing 900 and 976 service charges.

1. Nonpayment of 900 or 976 service charges will not result in a discontinuance of service;

¹ No change from the language currently appearing in the Rule was proposed for this subparagraph, so it has not been repeated here.

2. Customers can obtain blocking of 900 or 976 service from the local exchange company. (The name of the company is to be inserted.)

3. At the hearing in this matter, the Staff recommended a change to the language of the proposed Rule language which deleted the words "each page" in the next to last line of subparagraph (a) and substituted the words "the section." (T. 11)

4. United supports the proposed Rule language with the Staff revision described above, but is concerned that this language is going to be changed again in phase 2 of this Docket. This will require United and other local exchange companies to again make changes to their billing systems. It would be more economical in savings of time and money, less disruptive and more easily understood by customers to make one change to this language rather than two changes.

5. Phase 2 of this Docket covers subjects in addition to those being considered in this phase of the Docket. United's comments are directed only to that portion of the phase 2 Rule language which deal with the same portion of Rule 25-4.110, F.A.C., being considered in this phase of the Docket.

6. The Rule language proposed in phase 2, which is the equivalent to the language being considered in this phase of the Docket, has been moved from Section 1 of the Rule to Section 10 and reads as follows:

(10) This section applies to local exchange companies and interexchange carriers that provide transmission service and/or bill and collect on behalf of Pay Per Call providers. Pay Per Call services are defined as switched telecommunications services between locations within the State of Florida which permit

communications between an end use customer and an information provider's program at a per call charge to the end user/customer. Pay Per Call services include 976 Services provided by the local exchange companies and 900 services provided by interexchange carriers.

(a) Charges for Pay Per Call service (900 or 976) shall be segregated from charges for regular long distance or local charges by appearing separately under a heading that reads as follows: "Pay Per Call (900 or 976) nonregulated charges." The following information shall be clearly and conspicuously disclosed on each section of the bill containing Pay Per Call (900 and 976) service charges.

1. Nonpayment of Pay Per Call (900 or 976) service charges will not result in a disconnection of local service;

2. End Users/customers can obtain free blocking of Pay Per Call service (900 or 976) from the local exchange company;

3. The local or toll-free number the end-user/customer can call to dispute charges;

4. With 900 service, the name of the interexchange carrier providing 900 service; and

5. The Pay Per Call service (900 or 976) program name.²

7. The significant differences between the language being considered in this phase of the Docket with recommended changes by the Staff and the phase 2 language are:

The lead paragraph of Section (10) of the phase 2 language is specifically addressed to Pay Per Call services and defines the services. The phrase "Pay Per Call" to describe 900 and 976

² This language is quoted from an attachment to a FPSC Memorandum, dated June 4, 1991, Subject: Data Request for Proposed Changes to Rules 25-4.100, FAC, Customer Billing, Docket No. 910060-TP, TO: Florida Local Exchange Companies, Interexchange Carriers.

service is added wherever "900 and 976" appeared in the phase 1 language. The word "free" is added before "blocking" in Section (10)(a)2. Sections (10)(a)3., 4. and 5. are added.

8. Other than a minor disagreement over using the words "end user" in a communication with a customer, as is required by Section (10)(a)2. of the phase 2 language, United has no objection to the phase 2 language quoted above. United proposes that in order to avoid making two changes to the same Rule language in a short period of time that the phase 2 language quoted above be adopted in this proceeding rather than the language contained in FPSC Order No. 24477.

9. Regardless of what language is adopted, the changes proposed in the revision of Rule 25-4.110 will require United's billing system to be revised. Ten billing modules in the billing program itself will require changes to provide for the segregation of pay per call calls from other long distance calls. (T. 85-86) Changes to six billing modules of the billing format program are required to create a separate section of the bill for the pay per call calls, and to create a section heading and a subtotal. Changes in the format program are also required to create a separate line charge item on the LEC/IXC summary page of the bill. Format programs must also be modified to print the language required on those bills which contain pay per call calls. The entire system must then be tested to assure that the changes made work properly and have not affected any other portions of the bill. (See generally, T. 85-87)

10. United originally estimated that the revisions to the billing system would take eight months. United has proceeded with the revisions it can make without the final language of the Rule revision and now estimates the remaining revisions can be made within six months of receiving the revised Rule language. United requests six months from receiving the revised Rule language to implement the changes to its billing system required in this Docket.

11. In the Hearing in this matter held July 31, 1991, United was asked to include in its comments responses to two questions. These responses are as follows:

A. Can United's billing system add the language required by the proposed Rule to each page of the bill where IXC charges are reflected?

United's billing system can be modified to add the required language on each page of the bill where IXC charges are reflected. The modifications involve extensive and detailed reprogramming of United's billing system.

B. Can United's billing system add the language required by the proposed Rule to each page of the bill?

United's billing system would require extensive program and format changes to add the required language to each page of the bill. The first page of the bill is intended to be returned with the customer payment. Information is entered in specific locations on this page of the bill to facilitate payment processing. Other pages of the bill have been formatted to facilitate customer

understanding. All such specifically formatted pages would have to be redesigned and rearranged through programming in the billing system if the required language were required on every page of the bill. In addition to the time and cost of programming and format changes, an increase postage would be anticipated.

12. The language required by the proposed Rule includes a notice stating that nonpayment of pay per call services will not result in discontinuance of service, and a notice that blocking of pay per call service is available. Adding the language required by the proposed Rule revision to each bill page where IXC charges appear is not necessary if the pay per call calls are to be segregated and appear in a separate section of the bill. Such language, appearing on a page which contains only non-pay per call long distance calls, may lead a customer to believe that his or her local service could not be disconnected if the customer did not pay his or her non-pay per call long distance charges. It is unclear to United if the Office of Public Counsel's request, listed in paragraph 11.B. above, meant that the language should be added to every page of every bill, or every page of every bill containing pay per call charges. In either case, the addition of such language will increase the size of the bill, increase postage in some cases, and confuse customers. United urges adoption of Rule language which requires inclusion of language concerning nondiscontinuance of service and notice of blocking only on the section of the bill containing pay per call charges.

13. Finally, United states that since its 976 tariff has been in effect, it has contained a prohibition against denial or discontinuance of service for failure to pay 976 call charges. (Section A13, U.2.d., General Exchange Tariff) United has a similar policy concerning the failure to pay for 900 call charges.

Respectfully submitted,



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**CERTIFICATE OF SERVICE
DOCKET NO. 910060-TP**

I HEREBY CERTIFY that a copy of United Telephone Company of Florida's Post Hearing Comments has been furnished by United States Mail to the following parties this 12th day of August, 1991:

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