

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SOUTHERN BELL TELEPHONE COMPANY

DOCKET NO. 920260-TL

TESTIMONY OF

NANCY PRUITT

NOVEMBER, 1992

DOCUMENT NUMBER-DATE
14168 GEC-4 1992
FPSC-RECORDS/REPORTING

1 Q. State your name and address.

2 A. Nancy Pruitt, 101 E. Gaines Street, Tallahassee, Florida
3 32399.

4 Q. Where are you employed?

5 A. I am employed by the Florida Public Service Commission as
6 a Consumer Complaint Analyst for the Division of Consumer
7 Affairs.

8 Q. Give a brief description of your background and
9 experience.

10 A. In 1972 I received a Bachelor of Arts Degree in
11 government from Florida State University. I began
12 employment with the Florida Public Service Commission in
13 January 1990.

14 Q. Briefly describe your position and duties.

15 A. As a Senior Consumer Affairs Analyst, I receive and
16 investigate complaints against regulated utilities. I
17 work with utility companies and their customers to
18 achieve resolution of complaints. I provide explanation
19 and counseling on various matters related to utility
20 company rates and service and compliance with PSC rules
21 and utility company tariffs. I review complaint data to
22 track problem areas and trends.

23 Q. Describe the nature of your testimony.

24 A. My testimony will set forth the complaint activity in the
25 Consumer Affairs Division involving Southern Bell

1 Telephone and Telegraph Company (Southern Bell).
2 Exhibits will show the number and types of complaints
3 received, the justification for the customer having
4 contacted the commission, and the complaint activity of
5 Southern Bell compared with other local exchange
6 telephone companies (LECs).

7 Q. What time period will your testimony encompass?

8 A. My testimony will focus on the complaint activity of
9 calendar years 1987 - 1991 and the first six months of
10 1992.

11 Q. Describe any preliminary screening that may take place
12 before a complaint is logged to be investigated.

13 A. A complaint is not logged unless the analyst receiving
14 the contact determines that the matter appears to be
15 within the jurisdiction of the commission and that there
16 is reason to believe that the complaint may be justified.
17 If it appears there is nothing the commission can do to
18 help, or the complaint is clearly not justified, the
19 customer is so advised.

20 Q. What procedure is followed when a complaint is logged?

21 A. Information is entered on a consumer request form and the
22 company is requested to review the complaint and respond.
23 When the response is received, both the complaint and the
24 response are reviewed by Consumer Affairs personnel to
25 determine compliance with commission rules and company

1 tariffs and to determine what other action, if any, needs
2 to be taken. Before a complaint is closed, the analyst
3 handling the case customarily contacts the customer to
4 verify satisfaction or discuss the action taken and the
5 applicable rules and tariffs.

6 Q. How many complaints were logged against Southern Bell
7 during 1991?

8 A. Records show that 2,160 complaints were logged against
9 Southern Bell during 1991.

10 Q. How do these figures compare with complaint activity for
11 1990?

12 A. Complaints were up 13% from 1990. There were 2,160
13 complaints logged against the company during 1991,
14 compared to 1912 during 1990.

15 Q. How many complaints were logged against Southern Bell
16 during the first six months of 1992?

17 A. Seven hundred forty-two (742) complaints were logged
18 against Southern Bell from January 1 through June 30.

19 Q. How do these figures compare with complaint activity for
20 the first six months of 1991?

21 A. Complaints were down 31%. There were 742 complaints
22 logged against the company in the first six months of
23 1992 compared to 1,079 during the same time period in
24 1991.

25 Q. How does complaint activity compare with complaint

1 activity figures for preceding calendar years?

2 A. This comparison is shown in NP-1. NP-1 is a graph of
3 Southern Bell's complaint activity for the past 10 years
4 and shows a significant decline in complaints against
5 Southern Bell from 1982 to 1987 and a smaller, gradual
6 increase in complaints from 1987 to 1991.

7 Q. What types of complaints were received against Southern
8 Bell during 1991?

9 A. During 1991, Consumer Affairs received 544 complaints
10 about billing and 1,616 about service-related matters.

11 Q. Are complaints classified more specifically?

12 A. Yes. After an analyst takes a complaint and determines
13 whether the complaint is related to a service or billing
14 problem, the analyst chooses a more specific
15 classification category to further identify the
16 complaint.

17 Q. What were the major types of complaints received against
18 Southern Bell in 1991?

19 A. The top five complaint types for Southern Bell during
20 1991 were delayed new connections (427), followed by
21 complaints about continuous service problems (223),
22 service outages (198), improper disconnections (175) and
23 repair delays (106). NP-2 is a chart illustrating the
24 major types of complaints received against Southern Bell
25 in 1991.

1 Throughout the telephone industry, the number one
2 complaint type received during 1991 was delayed
3 connections followed by complaints about continuing
4 service problems, improper disconnections and service
5 outages.

6 Q. Do Consumer Affairs' records show what part of Southern
7 Bell's service area had the most complaints?

8 A. During 1991, customers in Dade county logged 719
9 complaints (33%) followed by Broward with 423 complaints
10 (20%), Palm Beach with 231 complaints (10%), Orange with
11 106 complaints (5%), Duval with 104 complaints (5%), and
12 Volusia with 90 complaints (4%).

13 Q. Have you compared the complaint activity of Southern Bell
14 with that logged against other companies?

15 A. Yes. NP-3 and NP-4 compare the five major local exchange
16 companies for the calendar years of 1987 through 1991.
17 NP-3 includes the number and types of complaints logged
18 and the percentage of increase or decrease from the
19 previous year. NP-4 includes a breakdown of the
20 justification, the number of complaints and justified
21 complaints per total access lines for the five major
22 LECs, the percentage of total complaints filed against
23 each, and industry totals.

24 Q. How does Southern Bell compare with the other LECs for
25 the number and types of complaints received?

1 A. For the time period 1987-1991 the most common type of
2 complaint received against Southern Bell and LECs as a
3 group concerned delayed new service connections, followed
4 by continuous service problems, service outages and
5 improper disconnections.

6 As shown in NP-3, complaints against Southern Bell
7 have increased each year since 1987 except in 1990 when
8 complaint activity for the company decreased 1% from the
9 previous year.

10 On a year by year basis Southern Bell has had a
11 larger increase in the percentage of complaints for each
12 year than the industry average, except for 1991 when the
13 total number of complaints against LECs increased by 16%
14 from the previous year and Southern Bell's complaints
15 increased by 13%. Since 1987 Southern Bell's complaints
16 have increased 36% while the average complaint activity
17 against the LECs as a whole has increased 7%. The number
18 of Southern Bell complaints per 1000 access lines has
19 increased since 1987 from .441 per 1000 to .492 per 1000
20 in 1991.

21 Q. How is justification for a complaint determined?

22 A. When the complaint analyst reviews the company's report
23 and closes the complaint, the analyst determines whether
24 the complaint was justified, not justified, or had some
25 justification. The determination is noted on the

1 complaint file. In each case, determination is based on
2 commission rules, company tariffs, and/or common sense
3 guidelines. Every effort is made to be as objective as
4 possible.

5 Q. What was the closing determination for the Southern Bell
6 complaints closed during the time period analyzed?

7 A. Exhibit NP-4 shows the closing determination for
8 complaints filed against the five major LECs and the
9 totals for all LECs. Since 1989 Southern Bell has had a
10 slightly higher percentage of justified complaints each
11 year than LECs as a group. In 1991 Southern Bell's
12 percentage of justified complaints was 42% compared to
13 41% for the industry average.

14 The number of justified Southern Bell complaints per
15 1000 access lines has been higher than LECs as a group
16 from 1988 through 1991. In 1991 Southern Bell's
17 justified complaints per 1000 access lines were .210
18 compared to .172 for the industry.

19 Q. How does Southern Bell compare to other LECs in the
20 number of complaints filed per access lines and the
21 percentage of access lines each company provides in
22 Florida?

23 A. NP-4 shows that when comparing the percentage of
24 complaints received by each company to that company's
25 percentage of Florida's total access lines, Southern Bell

1 received a larger percentage of the state's total
2 complaints than its percentage of access lines in the
3 state for each year since 1988. For example, in 1991
4 Southern Bell had approximately 58% of the total access
5 lines in Florida but 69% of the total number of
6 complaints.

7 Q. Are there any major areas which Southern Bell should
8 review for compliance with the rules of the commission?

9 A. Yes. Southern Bell should review its activities for
10 compliance with rule 25-4.113 F.A.C. relating to refusal
11 or discontinuance of service. Special attention should
12 be given to section (4) which outlines insufficient cause
13 for refusing service to a customer or applicant.

14 In 1991, 35 complaints were logged against Southern
15 Bell for refusal of service. This represented 56% of the
16 refusal of service complaints for the industry. Southern
17 Bell had refused service for non-payment of previous
18 occupants' bills, for outstanding charges in another
19 state and for outstanding charges of an ex-spouse. One
20 hundred seventy-five (175) complaints were also received
21 in which customers complained service was improperly
22 disconnected for non-payment of a bill of a previous
23 tenant, non-payment of yellow page advertising, or not
24 properly posting payments to customer accounts.

25 Clerical errors in service orders also caused

1 improper disconnections. Service was also improperly
2 disconnected without notice for non-payment of the
3 initial deposit. Customers also complained that they
4 were not notified of a delay in processing payments made
5 at a pay agency, which caused their service to be
6 disconnected for nonpayment. The 175 complaints
7 represented 68% of the complaints concerning the improper
8 disconnection of service for the industry as a whole.
9 Forty-six (46) percent of Southern Bell's refusal of
10 service complaints and 39 percent of the improper
11 disconnection of service complaints were found to be
12 justified in 1991.

13 The major complaint category for Southern Bell in
14 1991 concerned delays in new service connections. Four
15 hundred twenty-seven (427) complaints were logged with
16 52% found justified. Service was not timely provided due
17 to lack of facilities, defective facilities, heavy
18 workload, severe weather, and orders processed without
19 scheduling necessary field visits. Customers were often
20 not kept informed of the delays. This has been the major
21 complaint category for Southern Bell since 1987.

22 Q. Can you identify through complaint activity any other
23 areas in which it appears Southern Bell should improve?

24 A. Yes. The second largest category of complaints logged
25 against Southern Bell concerned continuing service

1 problems. In many cases Southern Bell failed to isolate
2 the trouble correctly when the customer first reported a
3 problem with service. In one case, a customer made 9
4 reports of cross-talk to the company over an 8-month
5 period. Field technicians were dispatched to isolate and
6 correct the trouble condition. Various problems were
7 corrected and the report closed each time. Finally a
8 problem was identified in the central office equipment
9 and the trouble was cleared.

10 Customers also complained of delayed repairs and
11 service not being timely restored after an outage.
12 Company reports indicate in some cases the company failed
13 to isolate the trouble correctly, trouble reports were
14 closed in error when the service was not restored, and
15 technicians were not timely dispatched due to heavy
16 workload.

17 Two hundred twenty-three (223) complaints were
18 received concerning continuing service problems, service
19 outages and delayed repairs. These complaints represent
20 10% of the total complaints received against Southern
21 Bell in 1991 and 44% were found to be justified.

22 In 1991 Consumer Affairs logged 48 complaints
23 concerning the billing of custom calling features not
24 ordered. In several cases the company had previously
25 agreed to give the customer a partial refund. After

1 receiving the complaint, the company credited the
2 customer from the time the billing began.

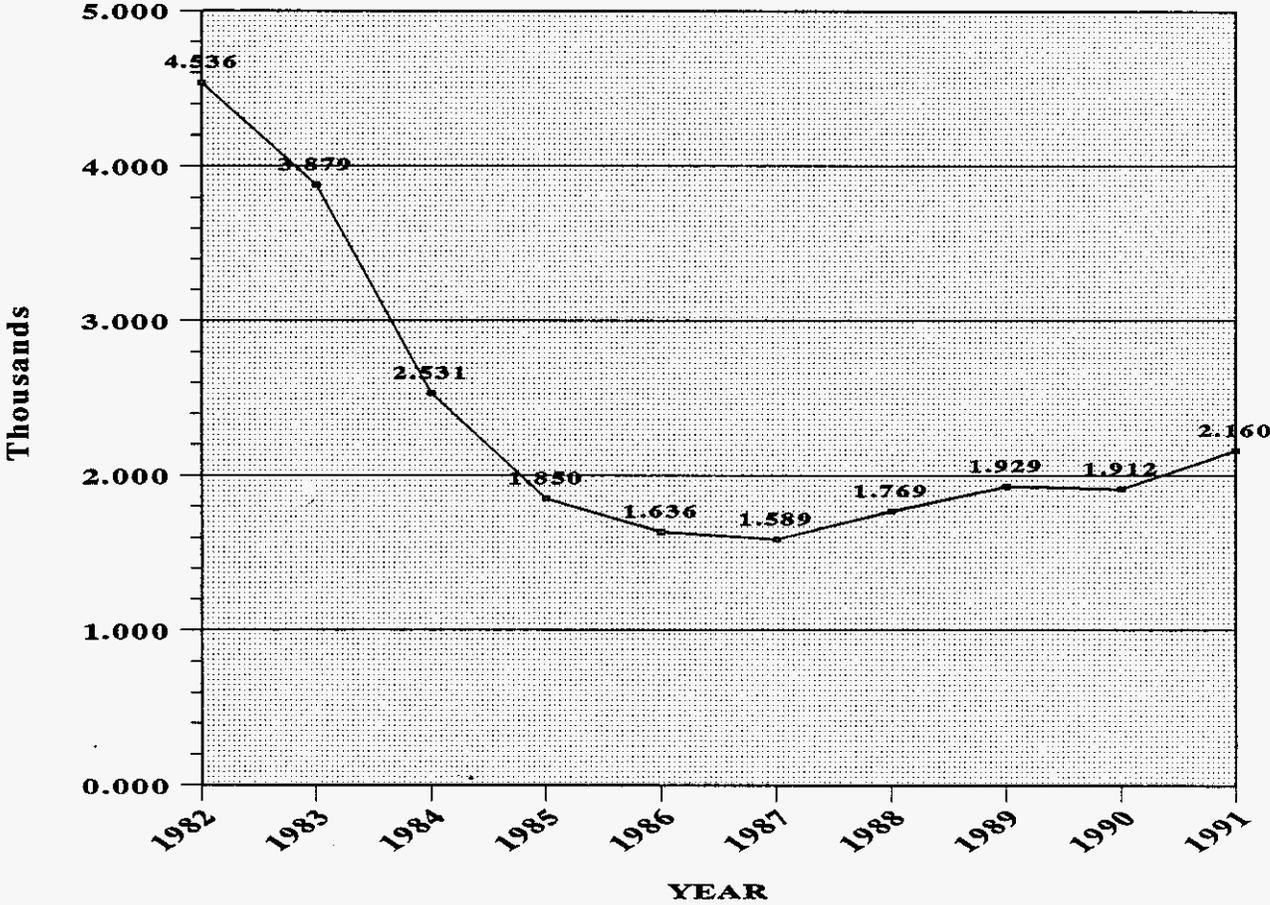
3 Consumer Affairs also logged 31 letters, inquiries
4 and complaints during 1991 concerning billing for inside
5 maintenance plans which the customers did not order.

6 Q. Does this conclude your testimony?

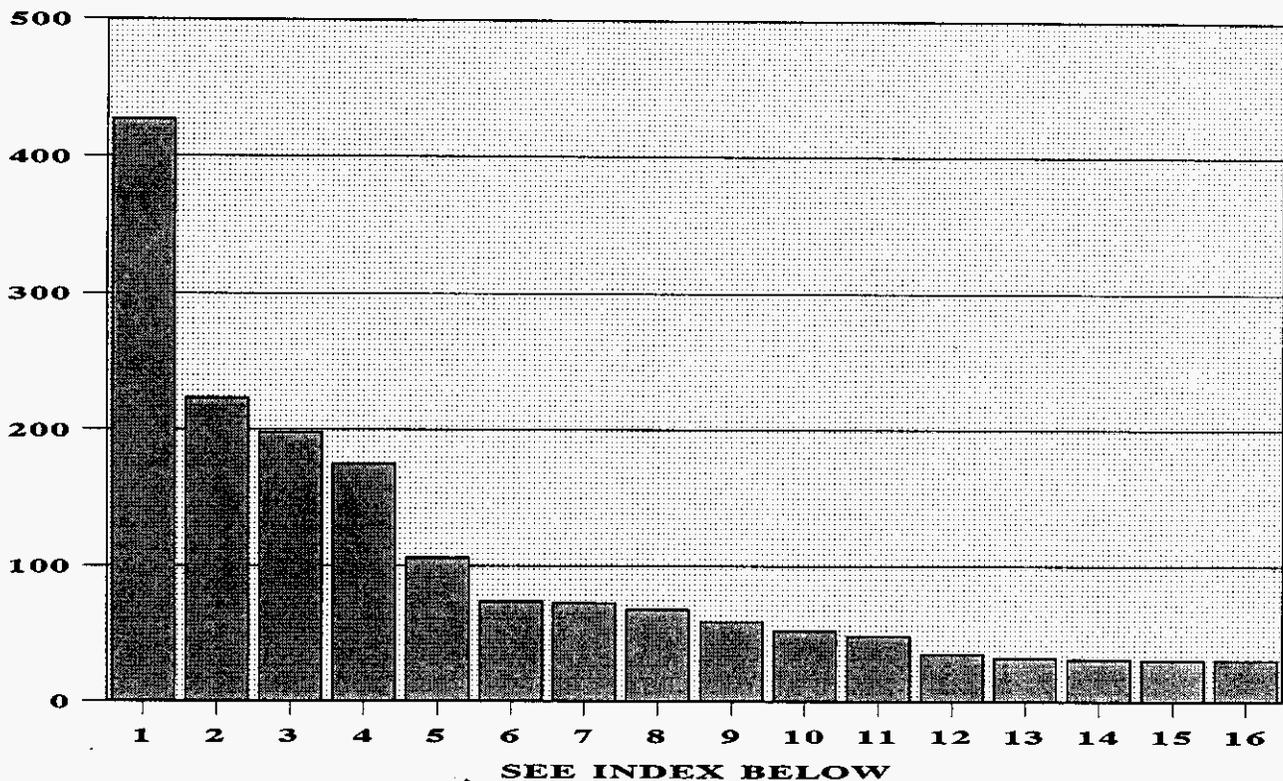
7 A. Yes.

SOUTHERN BELL LOGGED COMPLAINTS

10 Year Comparison



SOUTHERN BELL TELEPHONE COMPANY COMPLAINT RATE BY TYPE - 1991



- | | |
|---------------------------------------|--|
| 1. Delay Connect - New Location (427) | 10. Billing Wrong Customer (52) |
| 2. Continuous Service Problems (223) | 11. Custom Calling Features-Billing (48) |
| 3. Service Outage (198) | 12. Service Refused (35) |
| 4. Improper Disconnect (175) | 13. Payment Not Credited (32) |
| 5. Delay Repair - Not Outage (106) | 14. 976 - 900 Billing (31) |
| 6. Business Office Problem (74) | 15. Delay Connection - Add./Same Loc. (30) |
| 7. Miscellaneous Service (73) | 16. Restore Area (30) |
| 8. Delay in Refund or Credit (68) | 17. Other Types (499) |
| 9. Miscellaneous Billing (59) | |

CALENDAR YEAR 1991

	Service	Billing	1991 Total Received	% Change From 1990	Major Type
ALLTEL Florida, Inc.	38	25	63	43%	Service Problem
Centel	85	44	129	3%	Business Office Problem
GTE Florida	317	194	511	41%	Service Problem
Southern Bell	1616	544	2160	13%	Delay Connect
United Telephone	165	81	246	8%	Improper Disconnect
Total *	2237	899	3136	16%	Delay Connect

*Includes All LEC's

CALENDAR YEAR 1990

	Service	Billing	1990 Total Received	% Change From 1989	Major Type
ALLTEL Florida, Inc.	35	9	44	-17%	Service Problem
Centel	77	48	125	-11%	Service Problem
GTE Florida	236	126	362	-16%	Service Problem
Southern Bell	1529	383	1912	-1%	Delay Connect
United Telephone	166	61	227	-10%	Improper Disconnect
Total *	2070	633	2703	-5%	Delay Connect

*Includes All LEC's

CALENDAR YEAR 1989

	Service	Billing	1989 Total Received	% Change From 1988	Major Type
ALLTEL Florida, Inc.	44	9	53	-9%	Service Problem
Centel	99	41	140	-19%	Service Problem
GTE Florida	302	131	433	-19%	Service Problem
Southern Bell	1475	454	1929	9%	Delay Connect
United Telephone	169	82	251	2%	Service Problem
Total *	2117	726	2843	1%	Delay Connect

*Includes All LEC's

CALENDAR YEAR 1988

	Service	Billing	1988 Total Received	% Change From 1987	Major Type
ALLTEL Florida, Inc.	45	13	58	-23%	Service Problem
Centel	123	49	172	-29%	Delay Connect
GTE Florida	399	137	536	-26%	Service Problem
Southern Bell	1318	451	1769	11%	Delay Connect
United Telephone	158	88	246	-4%	Delay Connect
Total *	2069	750	2819	-4%	Delay Connect

*Includes All LEC's

CALENDAR YEAR 1987

	Service	Billing	1987 Total Received	% Change From 1986	Major Type
ALLTEL Florida, Inc.	61	14	75	3%	Delay Connect
Centel	170	71	241	18%	Service Problem
GTE Florida	581	145	726	-20%	Service Problem
Southern Bell	1111	478	1589	-3%	Delay Connect
United Telephone	180	77	257	-22%	Service Problem
Total *	2140	795	2935	-13%	Service Problem

*Includes All LEC's

CALENDAR YEAR 1991

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Lines	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	32	19	12	51%	1.196	.607	1%	2%
Centel	58	44	28	45%	.472	.212	4%	4%
GTE Florida	201	210	111	39%	.304	.120	22%	16%
Southern Bell	922	763	493	42%	.492	.210	58%	69%
United Telephone	72	140	49	28%	.230	.067	14%	8%
Total*	1296	1186	698	41%	.416	.172		

* Includes all LECs

CALENDAR YEAR 1990

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Lines	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	22	11	12	49%	.876	.438	1%	2%
Centel	64	47	27	46%	.476	.244	4%	5%
GTE Florida	121	177	75	32%	.222	.074	23%	13%
Southern Bell	719	679	513	38%	.450	.169	59%	71%
United Telephone	61	96	65	27%	.226	.055	14%	8%
Total*	993	1031	698	36%	.373	.136		

* Includes all LECs

CALENDAR YEAR 1989

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Lines	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	22	16	12	44%	1.114	.463	1%	2%
Centel	59	41	30	45%	.577	.243	4%	5%
GTE Florida	146	169	114	34%	.276	.093	23%	15%
Southern Bell	721	664	542	37%	.479	.179	59%	68%
United Telephone	67	118	89	24%	.269	.072	14%	9%
Total*	1028	1023	798	36%	.414	.150		

* Includes all LECs

CALENDAR YEAR 1988

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Lines	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	26	16	17	44%	1.281	.618	1%	2%
Centel	82	44	44	48%	.773	.373	3%	6%
GTE Florida	211	196	133	39%	.353	.141	23%	19%
Southern Bell	688	577	477	39%	.462	.180	59%	63%
United Telephone	59	93	79	26%	.285	.069	13%	9%
Total*	1076	946	757	39%	.432	.166		

* Includes all LECs

CALENDAR YEAR 1987

	Justification for Complaints Closed				Complaints Per	Justified Per	% State Total Access Lines	% LEC Total Complaints
	Yes	No	Some	% Justified	1000 Access Lines	1000 Access Lines		
ALLTEL	36	18	27	45%	1.736	.833	1%	3%
Centel	120	71	57	48%	1.158	.576	3%	8%
GTE Florida	355	234	146	48%	.504	.247	23%	25%
Southern Bell	566	653	432	34%	.441	.157	59%	54%
United Telephone	76	100	89	29%	.316	.093	13%	9%
Total*	1174	1093	761	39%	.477	.191		

* Includes all LECs

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive review of) DOCKET NO. 920260-TL
revenue requirements and rate)
stabilization plan of SOUTHERN) FILED: 12/04/92
BELL TELEPHONE AND TELEGRAPH)
COMPANY.)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY copies of the DIRECT TESTIMONY OF NANCY PRUITT have been furnished by U.S. Mail on this 4th day of December, 1992, to the following:

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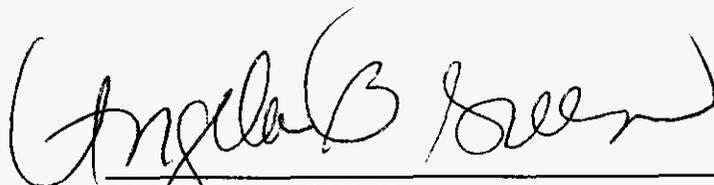
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