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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S repair service activities and reports.) DOCKET NO. 910163-TL

In re: Investigation into SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S compliance with Rule 25-4.110(2), F.A.C., Rebates.) DOCKET NO. 910727-TL (CONSOLIDATED) FILED: 12/17/92

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the attached STAFF'S SEVENTH SET OF INTERROGATORIES TO SOUTHERN BELL TELEPHONE AND TELEGRAPH has been furnished by U.S. Mail this 18th day of December, 1992 to the following:

Harris R. Anthony, Esquire Southern Bell Telephone and Telegraph Company c/o Marshall M. Criser, III 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301

Janis S. Richardson, Esquire Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-0863

David M. Wells, Esquire Robert J. Winicki, Esquire William S. Graessle, Esquire Mahoney, Adams & Criser

AC 3300 Barnett Center AFA 50 North Laura Street APJ P. O. Box 4099 Jacksonville, FL 32201

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Handwritten signature of Jean R. Wilson and typed name: JEAN R. WILSON Staff Counsel

Florida Public Service Commission 101 E. Gaines Street Tallahassee, FL 32399-0863 (904) 487-2740

DOCUMENT NUMBER-DATE 14742 DEC 21 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the) DOCKET NO. 910163-TL
integrity of SOUTHERN BELL)
TELEPHONE AND TELEGRAPH)
COMPANY'S repair service)
activities and reports.)

In re: Investigation into) DOCKET NO. 910727-TL
SOUTHERN BELL TELEPHONE AND) (CONSOLIDATED)
TELEGRAPH COMPANY'S compliance) FILED: 12/18/92
with Rule 25-4.110(2), F.A.C.,)
Rebates.)

**STAFF'S SEVENTH SET OF INTERROGATORIES
TO SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, Staff propounds the following interrogatories, numbers 74 through 117, to BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company. These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure.

Provide the name, address and relationship to the Company of each person providing answers to the following inquiries and identify which question(s) each person answered.

DEFINITIONS

"You", "your", "Company" or "Southern Bell" refers to BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY and its employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium,

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whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

"Identify" means:

(a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Company;

(b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

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76. Provide a list of the dates that Southern Bell distributed a copy of, "A Personal Responsibility", to all Southern Bell employees.

77. In response to Staff's 1st Set of Interrogatories, Item 3, Southern Bell claims that a "000" code in the Test-Results-CD field in the case of a New Service order does not apply and the computer populates the field with "000". However, a "000" code in the Test-Results-CD field during close out is considered an OUT-OF-SERVICE condition.

- a. Does MTAS ever set the OUT-OF-SERVICE flag to "1" for a New Service Order? If so, explain the circumstances that the flag would be set to "1".
- b. Is a New Service Order ever considered when Southern Bell is calculating its compliance with the PSC requirement of 95% of troubles repaired in 24 hours? If so, explain the circumstances when a New Service Order is used.

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78. In response to Staff's 1st Set of Interrogatories, Item 4, Southern Bell states that an Unclassified Class of Service (13) is placed in the MTAS "CLASS-SRVC" field when a working line is not identified. Does Southern Bell include any trouble reports that have been stasured as an Unclassified Class of Service when it calculates the PSC requirement of 95% of troubles repaired in 24 hours? If so, explain why.
79. Explain how Southern Bell calculates its PSC requirement of 95% of troubles repaired in 24 hours (Schedule 11). Include any reports or MTAS runs used to make this determination. (If MTAS runs are used be sure that it is clear as to what specific fields are used.)

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80. It is staff's understanding that Southern Bell uses MTAS to determine appropriate rebates for trouble reports that are reported out of service. In response to Office of Public Counsel's 7th Set of Interrogatories, Item 2, Page 2 of 3, Southern Bell states that a reason to exclude a customer rebate is when a trouble is statused no-access for customer reasons prior to 24 hours from receipt.
- a. Does Southern Bell use the no-access flag in MTAS to exclude a trouble report from rebate that is out of service and exceeds 24 hours from receipt to clear? If not, explain how Southern Bell identifies the no-access and what it uses to exclude out of service from receiving a rebate.
 - b. If Southern Bell's answer to (a) is yes, then explain how MTAS determines whether the no-access was before the 24 hour clock expires, when MTAS does not have the date and time when the trouble was statused as no-access.
81. In response to Office of Public Counsel's 21st Set of Interrogatories, Item 6, Southern Bell states that the program calculates the time from receipt of the trouble to the NAS time as greater than or less than 24 hours for refund purposes.
- a. Identify which program calculates this time.
 - b. Does the program use MTAS data?
 - c. If the answer to (b) is no, explain in detail where the data comes from to calculate the difference in times.
 - d. If the calculated time is over 24 hours, does that set the MTAS no-access flag to "1"? If not, explain what determines if the MTAS flag is set to "1"?

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82. In response to Office of Public Counsel's 9th Set of Interrogatories, Item 4, Southern Bell lists the criteria that must be met before a trouble is eligible to be extracted for MOOSA handling. Has this criteria changed since this response was filed? If so, provide a list of the new criteria.
83. Will the NAO status prohibit a customer from getting a rebate if the trouble exceeds 24 hours? If so, explain how LMOS or MTAS would exclude the trouble from rebate.

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84. Explain Mapper/Tracker and how it functions with LMOS.

85. In response to Office of Public Counsel's 21st Set of Interrogatories, Item 7, Southern Bell states that the MOOSA codes have changed since 1982. Identify the MOOSA criteria that was used in 1982, then identify any changes, the date of the change and the reason for the change to that criteria until the present.

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86. In response to Staff's 2nd Set of Interrogatories Item 5 - Page 4 of 7, Southern Bell states that the "OOS/not OOS" decision should be made up front when the commitment time is given to the customer.
- a. Does this statement mean that Southern Bell can not ever status a Service Affecting Trouble to OOS at close out? If not, explain what is meant by the statement listed above.
 - b. If the answer to part (a) is "Yes", then explain in detail how Southern Bell determines the up front statusing of a trouble report.
87. Has Southern Bell made any additional modifications to its LMOS/MTAS computer systems in regard to the date entry by Southern Bell employees for generating and updating trouble reports and service order, and all other data input changes made to these systems which are related to the generating and updating of trouble reports. Submit these changes in chronological order, dating from the response date of Staff's 2nd Set of Interrogatories to the present. For each modification provided, provide the following information in the order and format set out below. BellSouth practices will not be considered responsive to these Interrogatories.
- a. Date modification became effective.
 - b. The specific modification made.
 - c. Why the modification was made.
 - d. How the modification expanded or limited the Company employee's ability to enter data.
 - e. To what degree was the modification implemented in terms of the level and category of employees.
 - f. Full name of computer system changed.

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88. In response to Office of Public Counsel's 24th Set of Interrogatories, Item 1, Southern Bell states that a VER code can be manually entered.

- a. Explain all circumstances that would justify Southern Bell entering a VER code manually.
- b. Can Southern Bell prohibit its LMOS system from allowing a VER code from being entered manually? If so, what expense is involved. If not, explain why Southern Bell can not.

89. In response to Office of Public Counsel's 24th Set of Interrogatories, Item 2, Southern Bell states that a result code can be manually entered.

- a. Can Southern Bell prohibit its LMOS system from allowing a result code from being entered manually? If so, what expense is involved. If not, explain why it can't.

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90. In response to Staff's 3rd Set of Interrogatories, Item 16 (c), Southern Bell discusses validation checks in LMOS. In that response it says that the DATE field is pre-populated with the current date but can be overwritten. Southern Bell further states that an incorrect date entered will generate an error message.
- a. Identify exactly what date fields these statements apply to.
 - b. If Southern Bell's answer to (a) is all date fields (received date, commitment date, dispatched date, clear date and close date), explain how an MA or ST can put in a different time than the actual time an ST reports to close a trouble vs. the actual time the ST closed the trouble.
 - c. When you say an incorrect date entered will generate an error message, does that mean that an incorrect date form (mm-dd-yr), not necessarily an incorrect date, will generate an error message?
91. In response to Office of Public Counsel's 2nd Set of Interrogatories Item 2, Southern Bell states that the data attached was derived from total network reports which includes troubles cleared that are not included in the PSC Schedule 11A.
- a. Identify specifically what is included in the derived data that is not in PSC Schedule 11A.
 - b. Explain what information Southern Bell used to calculate the derived data. (i.e., MTAS, OOS flag in MTAS)

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92. In response to Office of Public Counsel's 6th Set of Interrogatories, Item 8, Southern Bell states that CVER is used to add or change a programmable VER code.

- a. Identify all employees by category (MAs, STs) that have the ability to change VER codes through use of the CVER code.
- b. Has this authorization to access this function changed in the past five (5) years? If so, explain when the change was made and for what reason Southern Bell implemented the change.

93. How many service orders did Southern Bell have in August 1990 for each IMC in Florida?

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94. Can a service order be identified in the MTAS data? If so, what fields must be looked at to identify a service order from a trouble report.

95. Has Southern Bell changed the codes recognized or used by any computer program or personnel to generate a MOOSA report for customer rebates since Southern Bell's response to Office of Public Counsel's 7th Set of Interrogatories, Item 4? If so, identify all changes to the codes.

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96. In response to Office of Public Counsel's 10th Set of Interrogatories, Item 2, Southern Bell states that STO is the only status code that can "stop the clock".

- a. What status codes in Southern Bell's LMOS system can be used to exclude a trouble report from being used in the calculation of the PSC OOS>24 hours 95% index. (e.g., weather)

97. In response to Office of Public Counsel's 13 Set of Interrogatories, Item 6, Southern Bell states that the "No-Access" flag in MTAS is derived from the NAS status code only.

- a. Does this mean that Southern Bell can not identify trouble reports that have a NAO status code?
- b. If the answer to (a) is no, identify how Southern Bell would identify the NAO status code in MTAS.

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98. Identify all fields on a DLETH that has the option of being automatically filled in by the computer system or manually filled in by an employee. (Provide a DLETH and highlight the fields.)

99. Identify all fields on a DLETH that must be filled in by a employee. (Provide a DLETH and highlight the fields.)

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100. What does WATH stand for and how is it used by Southern Bell?

101. What does DATH stand for and how is it used by Southern Bell?

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102. Provide the names, addresses and telephone numbers of all employees, who were disciplined by the Company in connection with their handling of customer trouble reports and who have since retired.

103. Provide the names, addresses and telephone numbers of all former employees, who were unavailable for depositions conducted by Office of Public Counsel staff the week of July 27-31, 1992.

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104. Provide the names, business addresses and telephone numbers, and positions within the Company of all employees, who were disciplined by the Company in connection with this investigation.

105. List all test result codes that Southern Bell considers to be OOS and SA.

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106. List all trouble codes that Southern Bell considers to be OOS and SA.

107. The July 7, 1987 memo, to all MAs from Dwight McInnise, discusses a PSC affecting cause code. Identify all PSC affecting cause codes and what is meant by the phrase PSC affecting cause code.

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108. List all MTAS reports generated by Southern Bell from MTAS. Explain in detail the purpose of each report and what fields are used to generate each report.

109. Explain what a DPVAL report and DJI report is and how Southern Bell uses these reports.

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110. List all VER codes that Southern Bell considers to be out of service.

111. Provide the employee numbers, by category of employee, of all employees associated with any portion of the repair system. (e.g. MA 100-199; STs 200-299)

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112. Explain how the PSC Schedule 11A is developed? If Southern Bell uses the MTAS system to develop PSC Schedule 11A, list the fields used.

113. Explain what E2700 reports are and how Southern Bell uses these reports.

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114. Explain Auto Correlation and how it is used in Southern Bell's repair system.

115. Explain how Southern Bell determines how many craft and managers are appropriate in an IMC.

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116. Does MTAS score subsequent reports differently than LMOS. If so, explain why and how.