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January 11, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 920260-TL - Rate Stabilization

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Rebuttal Testimony of A. Wayne Tubaugh, Robert G. Barrere, and Nancy H. Sims, which we ask that you file in the captioned docket.

ACK ✓
ABA 3 A copy of this letter is enclosed. Please mark it to
indicate that the original was filed and return the copy to me.
CSE Copies have been served to the parties shown on the attached
Certificate of Service.

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Sincerely yours,
Harris R. Anthony
Harris R. Anthony
(2)

6
Enclosures

cc: All Parties of Record
A. M. Lombardo
R. Douglas Lackey

Sims
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Barrere
DOCUMENT NUMBER-DATE
00367 JAN 11 83
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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *11th* day of *Jan.*, 1993

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ORIGINAL
FILE COPY

1 SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
2 REBUTTAL TESTIMONY OF A. WAYNE TUBAUGH
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 920260-TL
5 JNAUARY 11, 1993
6
7

8 Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS
9 ADDRESS.

10

11 A. MY NAME IS A. WAYNE TUBAUGH. I AM EMPLOYED BY
12 BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A SOUTHERN
13 BELL TELEPHONE AND TELEGRAPH COMPANY ("SBT" OR "THE
14 COMPANY"). MY BUSINESS ADDRESS IS SUITE 400, 150
15 SOUTH MONROE STREET, TALLAHASSEE, FLORIDA 32301.

16

17 Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND
18 AND EXPERIENCE.

19

20 A. I SERVED IN THE UNITED STATES ARMY FROM FEBRUARY 1966
21 UNTIL APRIL 1969. I WAS COMMISSIONED AND ATTAINED
22 THE RANK OF CAPTAIN PRIOR TO RESIGNING MY COMMISSION
23 FROM THE ARMY. I COMMANDED BOTH AN INFANTRY PLATOON
24 AND COMPANY IN COMBAT IN VIETNAM. UPON DISCHARGE
25 FROM THE MILITARY, I WAS GRADUATED FROM FLORIDA

1

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

1 STATE UNIVERSITY WITH A BACHELOR OF SCIENCE DEGREE IN
2 FINANCE AND MANAGEMENT IN 1975.

3
4 I STARTED WITH SOUTHERN BELL IN JULY OF 1973 IN
5 FLORIDA, WHERE I HELD ASSIGNMENTS IN THE NETWORK AND
6 PERSONNEL DEPARTMENTS. IN 1983 I ASSUMED
7 RESPONSIBILITIES IN SOUTHERN BELL'S HEADQUARTERS
8 RATES AND TARIFFS DEPARTMENT INVOLVING ACCESS TARIFF
9 AND REGULATORY MATTERS. IN THAT CAPACITY I TESTIFIED
10 BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION
11 ON SEVERAL OCCASIONS CONCERNING ACCESS SERVICE AND
12 COMPENSATION RELATED ISSUES.

13
14 IN 1987 I RETURNED TO THE FLORIDA NETWORK DEPARTMENT
15 WITH RESPONSIBILITIES FOR INSTALLATION AND
16 MAINTENANCE IN THE GAINESVILLE, FLORIDA DISTRICT. IN
17 APRIL 1989 I ASSUMED MY CURRENT POSITION.

18

19 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

20

21 A. THE PURPOSE OF MY TESTIMONY IS TO RESPOND TO THE
22 DIRECT TESTIMONY OF NANCY FRUITT AND DONALD MCDONALD
23 CONCERNING CUSTOMER COMPLAINTS AND SOUTHERN BELL'S
24 SERVICE PERFORMANCE.

25

1 Q. IN YOUR REVIEW OF MS. PRUITT'S TESTIMONY DID YOU
2 DETERMINE THAT SOUTHERN BELL'S PERFORMANCE IN REGARD
3 TO COMPLAINT ACTIVITY WAS SIGNIFICANTLY WORSE THAN
4 THAT OF THE OTHER LOCAL EXCHANGE COMPANIES (LECs) IN
5 FLORIDA?

6
7 A. NO. IN REVIEWING HER TESTIMONY, EXHIBITS, OTHER
8 TESTIMONY FILED CONCERNING SOUTHERN BELL'S SERVICE
9 PERFORMANCE, AND A REVIEW OF OUR CUSTOMERS' COMMENTS
10 CONCERNING THEIR SATISFACTION WITH OUR PERFORMANCE,
11 I HAVE FOUND THAT OUR PERFORMANCE IS AS GOOD OR
12 BETTER THAN THE OTHER LECs IN FLORIDA.

13
14 Q. CAN YOU EXPLAIN HOW YOU REACHED THAT CONCLUSION?

15
16 A. YES. MS. PRUITT STATES, AT LINES 12-15 ON PAGE 3,
17 THAT SOUTHERN BELL COMPLAINTS INCREASED 13% IN 1991
18 AS COMPARED TO 1990. AS CAN BE SEEN IN HER EXHIBIT
19 NP-3, PAGE 1 OF 3, WHERE SHE COMPARES FIVE LECs AND
20 PROVIDES THE INDUSTRY TOTALS, TWO OF THE OTHER LECs
21 EXPERIENCED A 43% AND 41% INCREASE IN COMPLAINTS, AND
22 THE TOTAL FOR ALL LECs IN FLORIDA INCREASED BY 16%.
23 ALTHOUGH SOUTHERN BELL PREFERS THAT COMPLAINTS BE
24 KEPT TO AN ABSOLUTE MINIMUM, THERE WAS AN INCREASE IN
25 COMPLAINTS AGAINST THE INDUSTRY IN GENERAL AND THE

1 INCREASE IN 1991 COMPLAINTS AGAINST SOUTHERN BELL WAS
2 LOWER THAN THE INDUSTRY AVERAGE.

3
4 IN ADDITION, AS SHOWN IN MY EXHIBIT AWT-1, INCREASED
5 COMPLAINT ACTIVITY AGAINST SOUTHERN BELL WAS CLOSELY
6 CONNECTED WITH MEDIA COVERAGE THAT SOUTHERN BELL
7 RECEIVED IN 1991. MAJOR NEWS STORIES CONCERNING SUCH
8 MATTERS AS CALLER ID*, MEMORY CALL*, AND ALLEGED
9 OVEREARNINGS BY SOUTHERN BELL WERE PUBLISHED DURING
10 THIS PERIOD AND WERE ACCOMPANIED BY AN INCREASE IN
11 COMPLAINT CALLS TO THE COMMISSION. IN ADDITION,
12 SOUTHERN BELL DEPLOYED SEVERAL NEW SERVICES DURING
13 1990 AND 1991 , AND WE BELIEVE THAT CUSTOMER
14 UNFAMILIARITY WITH THE SERVICES RESULTED IN
15 ADDITIONAL PSC COMPLAINTS.

16

17 Q. IN MS. FRUITT'S TESTIMONY SHE STATES, AT LINES 19-24
18 ON PAGE 3, THAT SOUTHERN BELL'S 1992 COMPLAINTS WERE
19 DOWN 31% FROM JANUARY 1, TO JUNE 30, 1992, COMPARED
20 TO THE SAME PERIOD LAST YEAR. HAS THIS TREND
21 CONTINUED THROUGHOUT 1992?

22

23 A. YES. SOUTHERN BELL'S COMPLAINTS ARE DOWN
24 SIGNIFICANTLY OVER THE SAME PERIOD LAST YEAR (31%)
25 AND CONTINUED THROUGH SEPTEMBER 1992 AT APPROXIMATELY

1 28% LESS. THIS TREND CONTINUED AND THE COMPLAINT
2 LEVELS AGAINST SOUTHERN BELL ARE BELOW THE 1987
3 COMPLAINT LEVELS. IN 1992, THE END OF THE YEAR
4 INDUSTRY AVERAGE CUSTOMER COMPLIANTS DECREASED 18%.
5 SOUTHERN BELL'S CUSTOMER COMPLAINTS RECEIVED BY THIS
6 COMMISSION DECREASED BY 25% IN 1992.

7
8 Q. IN MS. PRUITT'S TESTIMONY, AT LINES 19-23 ON PAGE 4,
9 SHE MENTIONS DELAYED CONNECTIONS AS THE MAJOR
10 COMPLAINT SOUTHERN BELL RECEIVED. DID YOU REVIEW
11 THIS ITEM?

12
13 A. YES. FIRST IT SHOULD BE NOTED THAT MS. PRUITT ALSO
14 STATES, AT LINES 1-3 ON PAGE 5, THAT DELAYED
15 CONNECTION WAS THE NUMBER ONE COMPLAINT RECEIVED BY
16 THE INDUSTRY. WITH REGARD TO SOUTHERN BELL, THE
17 COMPANY IS RESPONSIBLE FOR 60% OF THE RESIDENCE AND
18 BUSINESS ACCESS LINES IN THE STATE OF FLORIDA
19 (FLORIDA TELEPHONE ASSOCIATION (FTA) MEMBER COMPANIES
20 SUMMARY OF STATISTICS 1988-1991). MOREOVER, WHEN
21 REVIEWING THE FTA STATISTICS, THEY SHOW THAT SOUTHERN
22 BELL IS RESPONSIBLE FOR 63% OF THE INCREASE IN
23 RESIDENCE AND BUSINESS ACCESS LINES IN THE STATE
24 SINCE 1988. SINCE THIS INWARD MOVEMENT ACTIVITY IS
25 WHAT RESULTS IN THE POSSIBILITY OF DELAYED CONNECTS,

1 ONE WOULD THUS EXPECT THAT SOUTHERN BELL WOULD HAVE
2 MORE DELAYED CONNECT COMPLAINTS THAN THE OTHER LECs.
3 IT MUST ALSO BE RECOGNIZED THAT SOUTHERN BELL HAS
4 MANY OF THE MAJOR METROPOLITAN AREAS OF THE STATE.
5 THESE ARE AREAS WHERE ROADS AND BUILDINGS MAKE IT
6 DIFFICULT TO PLACE NEW FACILITIES. THIS CAN CAUSE
7 DELAYS IN GETTING PERMITS TO PLACE FACILITIES, A
8 PROBLEM THAT WAS DESCRIBED IN SOUTHERN BELL'S ANSWER
9 TO MANY OF THE COMPLAINTS LODGED AGAINST THE COMPANY.
10
11 IN ADDITION, BUSINESS CUSTOMERS ARE RESPONSIBLE FOR A
12 NUMBER OF THE ITEMS NEEDED TO PROVIDE SERVICE, SUCH
13 AS CONDUIT, SPACE, ELECTRICITY, BACKBOARDS, ETC. IF
14 THE CUSTOMER DOES NOT PROVIDE THESE IN A TIMELY
15 MANNER, IT CAN LEAD TO CONFUSION ABOUT SERVICE
16 CONNECTION AND CONSEQUENT COMPLAINTS. THIS WAS ALSO
17 DESCRIBED IN OUR RESPONSES TO THE DIVISION OF
18 CONSUMER AFFAIRS.
19
20 FINALLY, WE HAVE EXPERIENCED DELAYED CONNECTION
21 COMPLAINTS AS A RESULT OF MULTIPLE FAMILIES RESIDING
22 IN SINGLE DWELLINGS. THIS HAS OCCURRED PRINCIPALLY
23 IN DADE COUNTY. BASED ON HISTORIC TRENDS, SOUTHERN
24 BELL HAS FORECAST ONE AND ONE HALF PAIRS TO EACH
25 LIVING UNIT WHEN DESIGNING AND CONSTRUCTING ITS

1 DISTRIBUTION PLANT. ALTHOUGH THIS PRACTICE HAS
2 SERVED US WELL IN THE PAST, THIS HISTORICALLY BASED
3 ENGINEERING DID NOT ANTICIPATE THE LIVING PATTERNS OF
4 THE MOST RECENT INFLUX OF DISPLACED PEOPLE. OFTEN
5 TWO OR MORE FAMILIES RESIDE IN WHAT HAVE
6 TRADITIONALLY BEEN SINGLE FAMILY UNITS. EACH OF
7 THESE FAMILIES OFTEN REQUESTS PRIMARY TELEPHONE
8 SERVICE. NOT ONLY DOES THIS REQUIRE ADDITIONAL
9 DISTRIBUTION FACILITIES BUT ALSO DROP WIRE, NETWORK
10 INTERFACES AND, IN A GREAT MANY CASES, INSIDE WIRE
11 AND JACKS. THE PLACEMENT OF THESE FACILITIES TAKES
12 ADDITIONAL TIME, LEADING TO AN INCREASED NUMBER OF
13 DELAYED CONNECT COMPLAINTS.

14

15 Q. DOES ANY PSC RULE AFFECT THE CALCULATION OF THIS TYPE
16 OF SERVICE COMPLAINT AGAINST SOUTHERN BELL?

17

18 A. YES. COMMISSION RULE 24-4.090(2) STATES THAT THE
19 COMPANY HAS NO RESPONSIBILITY TO PROVIDE SERVICE
20 UNDER PART VI, "...UNLESS RIGHTS OF WAY AND EASEMENTS
21 SUITABLE TO THE UTILITY ARE FURNISHED BY THE
22 APPLICANT IN REASONABLE TIME TO MEET SERVICE
23 REQUIREMENTS AND AT NO COST, CLEARED OF TREES, TREE
24 STUMPS, PAVING AND OTHER OBSTRUCTIONS, STAKED TO SHOW
25 PROPERTY LINES AND FINAL GRADE, AND MUST BE GRADED TO

1 WITHIN SIX (6) INCHES OF FINAL GRADE BY THE
2 APPLICANT ALL AT NO CHARGE TO THE UTILITY". WHERE
3 THE TERMS OF THE ABOVE RULE ARE NOT MET, DELAYED
4 CONNECT COMPLAINTS SHOULD NOT BE CONSIDERED
5 JUSTIFIED. HOWEVER, IN PRACTICE THIS IS NOT THE
6 CASE. IT IS OUR COMPANY POLICY TO PROVIDE SERVICE TO
7 OUR CUSTOMERS WHENEVER POSSIBLE AND WE ATTEMPT TO DO
8 SO. THERE ARE MANY INSTANCES IN WHICH WE HAVE
9 RECEIVED COMPLAINTS FROM CUSTOMERS WHEN WE HAVE BEEN
10 DELAYED IN PROVIDING SERVICE AS A RESULT OF
11 CONTRACTORS PLACING HINDRANCES SUCH AS CURBS,
12 DRIVEWAYS, AND SIDEWALKS THAT HAVE INHIBITED OUR
13 ABILITY TO INSTALL CABLE AND DROPS. FOR EXAMPLE, WE
14 RECEIVED 17 CUSTOMER COMPLAINTS/INQUIRIES IN
15 LOXAHATCHEE, LOCATED IN PALM BEACH COUNTY, A 28
16 SQUARE MILE DEVELOPMENT WHERE THERE IS NOTHING BUT
17 DIRT ROADS, CANALS AND POORLY DEFINED EASEMENTS. IN
18 ACCORDANCE WITH THE COMMISSION'S RULE, WE DID NOT
19 HAVE TO PROVIDE SERVICE. HOWEVER, IN EVERY CASE
20 WHERE SERVICE WAS REQUESTED WE DID SO, ALTHOUGH
21 PERHAPS NOT AS QUICKLY AS DESIRED BY THE CUSTOMER.
22 IT IS DELAYS SUCH AS THESE, WHICH ARE BEYOND SOUTHERN
23 BELL'S CONTROL, THAT OFTEN LEAD TO COMPLAINTS.
24
25 IT SHOULD BE NOTED THAT MR. MCDONALD RECOGNIZES, AS

1 STATED IN HIS TESTIMONY AT LINES 23-25 ON PAGE 5 AND
2 LINES 1-2 ON PAGE 6, THAT SOUTHERN BELL'S DELAYED
3 CONNECTION COMPLAINTS ARE DOWN 52% FROM 1991. THIS
4 IS A SIGNIFICANT DECREASE AND SHOWS THE EXCELLENT
5 PROGRESS THAT SOUTHERN BELL HAS MADE IN THIS AREA.

6

7 Q. HAS SOUTHERN BELL SHOWN A MARKED IMPROVEMENT IN
8 CUSTOMER COMPLAINT ACTIVITY IN 1992?

9

10 A. YES. WHILE SOUTHERN BELL'S LEVEL OF COMPLAINTS WAS
11 .492 PER 1000 ACCESS LINES IN 1991, THAT NUMBER IS
12 .356 PER 1000 ACCESS LINES THROUGH THE END OF 1992.
13 COMPARING THE COMPLAINTS THROUGH JUNE 1991 OF .246
14 PER 1000 ACCESS LINES VERSUS A .163 PER 1000 ACCESS
15 LINES FOR THE SAME PERIOD IN 1992 SHOWS A DECREASE OF
16 37% AND A 28% REDUCTION FOR THE YEAR.

17

18 Q. YOU HAVE DISCUSSED TOTAL COMPLAINTS. SHOULD THE
19 LEVEL OF JUSTIFIED COMPLAINTS ALSO BE CONSIDERED?

20

21 A. YES. JUSTIFIED COMPLAINTS IS THE MEASUREMENT THAT
22 SHOULD BE REVIEWED. WHILE SOUTHERN BELL WOULD PREFER
23 TO HAVE NO JUSTIFIED COMPLAINTS, I MUST NOTE THAT
24 DURING THE 1987-1991 PERIOD, SOUTHERN BELL WAS NOT
25 THE COMPANY WITH THE HIGHEST LEVEL OF JUSTIFIED

1 COMPLAINTS PER 1000 ACCESS LINES. RATHER, SOUTHERN
2 BELL IS IN THE MIDDLE OF THE COMPANIES COMPARED BY
3 MS. PRUITT ON NP-4. IN ADDITION, SOUTHERN BELL
4 JUSTIFIED COMPLAINTS DECREASED IN 1988, 1989, 1990
5 OVER YEAR 1987. AS MENTIONED EARLIER, WHILE IT
6 INCREASED IN 1991, 1992 RESULTS ARE .128 PER 1000
7 ACCESS LINES, WHICH IS A REDUCTION OF 39% IN 1992
8 OVER 1991 RESULTS.

9

10 Q. YOU MENTIONED EARLIER A MEASUREMENT OF CUSTOMER
11 SATISFACTION CONCERNING THE COMPANY'S PERFORMANCE.
12 TO WHAT WERE YOU REFERRING?

13

14 A. THROUGH AN INDEPENDENT CONTRACTOR, SOUTHERN BELL
15 CONDUCTS A MONTHLY CUSTOMER SURVEY OF INSTALLATION
16 AND MAINTENANCE ACTIVITY. THIS CUSTOMER SURVEY IS
17 REFERRED TO AS TELSAM. THE QUESTIONS IN THE SURVEY
18 WERE DEVELOPED TO DETERMINE IF OUR CUSTOMERS ARE
19 SATISFIED WITH WORK PERFORMED FOR THEM BY SOUTHERN
20 BELL. A STATISTICALLY VALID SAMPLE OF RECENT ORDERS,
21 BOTH MAINTENANCE AND INSTALLATION, IS PROVIDED AND
22 EMPLOYEES OF THE CONTRACTOR CALL THE SELECTED
23 CUSTOMERS. AS YOU WILL NOTE IN EXHIBIT AWT-2, OUR
24 CUSTOMER SATISFACTION LEVELS HAVE BEEN EXCELLENT FOR
25 THE PAST 4 YEARS. MR. BARRERE WILL DISCUSS TELSAM

1 MORE EXTENSIVELY IN HIS TESTIMONY.

2

3 Q. DID YOU ATTEND THE LOCAL SERVICE HEARINGS CONDUCTED
4 BY THE COMMISSION IN CONNECTION WITH THIS DOCKET, AND
5 ARE YOU AWARE OF ANY MAINTENANCE OR INSTALLATION
6 COMPLAINTS BY CUSTOMERS AT THOSE HEARINGS?

7

8 A. YES. I ATTENDED THE HEARING IN JACKSONVILLE AND HAVE
9 REVIEWED THE TRANSCRIPTS OF PROCEEDINGS FOR THE
10 HEARINGS IN ORLANDO, PENSACOLA, AND PANAMA CITY.
11 DURING THOSE HEARINGS NOT ONE CUSTOMER SPOKE OUT
12 CONCERNING POOR INSTALLATION OR MAINTENANCE
13 PERFORMANCE BY SOUTHERN BELL. WHILE ONE CUSTOMER IN
14 JACKSONVILLE DISCUSSED A DENIAL OF SERVICE, THIS WAS
15 THE RESULT OF A DISPUTE CONCERNING PAYMENT OF HIS
16 BILL. ANOTHER CUSTOMER IN ORLANDO WAS UNHAPPY THAT
17 HIS VOICE GRADE RESIDENCE SERVICE, WHILE MEETING ALL
18 THE TRANSMISSION LIMITS, WOULD NOT ALWAYS WORK WHILE
19 HE TRANSMITTED DATA PROCESSED BY HIS COMPUTER. HIS
20 RESIDENCE SERVICE PERFORMED PERFECTLY FOR VOICE
21 CONVERSATION WHICH IS WHAT OUR TARIFFS PROVIDE FOR.

22

23 Q. ON PAGE 9, AT LINES 19-20, MS. PRUITT STATES,
24 "CUSTOMERS WERE OFTEN NOT KEPT INFORMED OF THE
25 DELAYS". DO YOU AGREE WITH THIS STATEMENT?

1

2 A. YES. THE MAJOR PROBLEM CAUSING CUSTOMER COMPLAINTS
3 IS A BREAKDOWN IN COMMUNICATIONS WITH THE CUSTOMER.
4 THIS RELATES NOT JUST TO ADVISING CUSTOMERS OF A
5 DELAY IN INSTALLATION AND THE REASONS FOR SUCH, BUT
6 ALSO EXPLAINING HOW SERVICES WORK, AS WELL AS
7 EXPLAINING VARIOUS OTHER ASPECTS OF SOUTHERN BELL'S
8 POLICIES, PLANS AND PROCEDURES, E.G., OEAS, DEPOSITS
9 AND MAINTENANCE OF WIRE. SOUTHERN BELL IS
10 AGGRESSIVELY PROMOTING OUR CORPORATE VALUE OF
11 "CUSTOMER FIRST", THROUGH A TOTAL QUALITY ADVANTAGE
12 PROGRAM. IN PARTICULAR, THIS EFFORT IS DESIGNED TO
13 KEEP THE CUSTOMER INFORMED AND KNOWLEDGEABLE OF OUR
14 PRODUCTS AND HOW THEY WORK, THEREBY REDUCING CUSTOMER
15 DISSATISFACTION AND RESULTANT COMPLAINT ACTIVITY.

16

17 Q. HAVE YOU REVIEWED MR. DONALD MCDONALD'S PREFILED
18 TESTIMONY?

19

20 A. YES.

21

22 Q. ON PAGE 3, AT LINES 2-10, MR. MCDONALD STATES THAT
23 THERE HAS BEEN WHAT HE TERMS A "DISTURBING TREND" IN
24 CENTERS MEETING THE COMMISSION'S RULE REQUIREMENTS
25 REGARDING SERVICE ORDER COMPLETION AND REPAIRING

1 TROUBLES WITHIN TWENTY FOUR HOURS. DO YOU AGREE?

2

3 A. NO. IN FACT, I AM SURPRISED THAT MR. MCDONALD HAS
4 CHOSEN TO RAISE THESE ISSUES AT THIS TIME. WE FILE
5 QUARTERLY QUALITY OF SERVICE REPORTS BASED ON
6 MONTHLY ACTIVITY BY EXCHANGE. IN ADDITION, AS
7 REQUIRED BY THE COMMISSION, WE FILE WITH EACH REPORT
8 AN EXPLANATION OF THE REASONS FOR MISSES, IF ANY.
9 UNTIL MR. MCDONALD'S TESTIMONY, WE HAD NOT BEEN TOLD
10 THAT THE COMMISSION STAFF QUESTIONED ANY OF OUR
11 REPORTED FAILURES OR THE REASONS FOR THE EXCHANGE
12 MISSES. ALTHOUGH SOUTHERN BELL WOULD CLEARLY PREFER
13 TO HAVE NO EXCHANGE MISSES, THE ONES THAT IT HAS
14 EXPERIENCED DO NOT INDICATE ANY DETERIORATION IN
15 SERVICE LEVELS. FOR THE MOST PART, THESE MISSES WERE
16 ATTRIBUTABLE TO ADVERSE WEATHER CONDITIONS WHICH
17 INCREASED THE DEMAND LOAD, MAKING IT MORE DIFFICULT
18 TO CLEAR TROUBLES WITHIN 24 HOURS.

19

20 IN REGARD TO SERVICE ORDER COMPLAINTS, MR. ALAN
21 TAYLOR, CHIEF OF THE BUREAU OF SERVICE EVALUATION, IN
22 A LETTER DATED SEPTEMBER 12, 1991, REQUESTED FROM
23 SOUTHERN BELL AN EXPLANATION OF CUSTOMER COMPLAINTS
24 FILED WITH THE DIVISION OF CONSUMER AFFAIRS REGARDING
25 DELAYED CONNECTIONS.

1
2 WE RESPONDED BY INFORMING MR. TAYLOR THAT WE HAD
3 IDENTIFIED PROBLEMS IN THE MIAMI, FORT LAUDERDALE,
4 AND WEST PALM BEACH EXCHANGES AND PROVIDED OUR PLANS
5 FOR IMPROVEMENT. MR. TAYLOR THEN REQUESTED, IN A
6 LETTER DATED NOVEMBER 12, 1991, OUR ESTIMATED TIME
7 FRAME FOR IMPLEMENTING OUR PLANS FOR IMPROVEMENT AND
8 WHEN WE EXPECTED IMPROVEMENT. WE ADVISED HIM THAT
9 OUR PLAN WAS IMPLEMENTED ON OCTOBER 16, 1991, AND
10 THAT WE EXPECTED IMMEDIATE IMPROVEMENT. THAT PLAN,
11 AS RECOGNIZED BY MR. MCDONALD, HAS BEEN SUCCESSFUL.
12 IN HIS TESTIMONY, ON PAGE 5 AT LINES 23-25 AND PAGE 6
13 AT LINES 1-2, HE RECOGNIZES THAT FOR THE SAME PERIOD
14 IN 1992 VERSUS 1991 SOUTHERN BELL REALIZED A 52%
15 REDUCTION IN DELAYED CONNECTION COMPLAINTS. THIS IS
16 A SIGNIFICANT REDUCTION IN COMPLAINTS AND WE BELIEVE
17 THAT THE PLAN WE IMPLEMENTED, ALONG WITH THE TOTAL
18 QUALITY ADVANTAGE PLAN I MENTIONED EARLIER, WILL
19 CONTINUE THIS TREND. THIS IS INDICATIVE OF SOUTHERN
20 BELL'S CONTINUING EFFORTS TO CORRECT POTENTIAL
21 SERVICE PROBLEMS OF ANY SORT.

22

23 Q. MR. MCDONALD NOTES, HOWEVER, THAT THIS IMPROVEMENT IS
24 NOT REFLECTED IN SOUTHERN BELL'S QUARTERLY REPORTS.
25 DO YOU HAVE AN EXPLANATION FOR THIS?

1

2 A. YES. SOUTHERN BELL IS MEASURED ON AN EXCHANGE BASIS
3 FOR SERVICE ORDER ACTIVITY, REPEAT REPORTS, TROUBLE
4 REPORTS CLEARED WITHIN SEVENTY TWO HOURS, AND OUT OF
5 SERVICE TROUBLE REPORTS RESTORED WITHIN TWENTY FOUR
6 HOURS. SOUTHERN BELL HAS 102 EXCHANGES, 63% OF WHICH
7 HAVE FEWER THAN 20,000 ACCESS LINES, AND 54% OF WHICH
8 HAVE FEWER THAN 10,000 ACCESS LINES.

9

10 IN THESE SMALL EXCHANGES, EVEN ONE OR TWO MISSES IN
11 THESE CATEGORIES CAN CAUSE US TO FAIL THE OBJECTIVE.
12 WE HAVE BEEN TOLD BY BOTH THE COMMISSION AND STAFF
13 THAT IF OUR EXPLANATION OF THE MISSED OBJECTIVE IS
14 REASONABLE AND THE EXCHANGE IS NOT MISSED REGULARLY,
15 NEITHER SOUTHERN BELL NOR ANY OTHER COMPANY WOULD BE
16 CONSIDERED UNSATISFACTORY IN ITS SERVICE PERFORMANCE.
17 MR. MCDONALD'S ANALYSIS DOES NOT MENTION OUR
18 EXPLANATIONS FOR THE MISSES, WHETHER THEY ARE
19 CONSIDERED REASONABLE, OR IF THERE IS A PATTERN OF
20 MISSES IN ANY PARTICULAR EXCHANGE. I AM, THEREFORE,
21 SURPRISED THAT THE PERIODIC REPORT ANALYSIS HAS BEEN
22 RAISED AT THIS TIME, PARTICULARLY SINCE SOUTHERN BELL
23 BELIEVES THAT ITS EFFORTS IN THESE EXCHANGES HAS BEEN
24 SATISFACTORY.

25

1 MR. MCDONALD ALSO REFERS TO A PURPORTED TREND IN THE
2 PERIODIC REPORTS REGARDING SERVICE ORDER COMPLETIONS.
3 HOWEVER, HE FAILS TO MENTION THE 100% SATISFACTORY
4 RESULT THE STAFF DETERMINED AS A RESULT OF THE
5 ORLANDO/GAINESVILLE SERVICE EVALUATION.

6

7 Q. HAVE YOU REVIEWED MR. MCDONALD'S ANALYSIS OF THE
8 RESULTS OF THE 1992 SERVICE EVALUATION PERFORMED BY
9 THE STAFF IN ORLANDO AND GAINESVILLE?

10

11 A. YES. MR. MCDONALD STATES THAT THE STAFF MEASURED 71
12 STANDARDS AND THAT THE COMPANY FAILED TO MEET 14 OF
13 THE STANDARDS IN THIS SERVICE EVALUATION.

14

15 MR. MCDONALD INDICATES THAT 8 OR 57% OF HIS LESS THAN
16 SATISFACTORY RESULTS ARE RELATED TO THE COMPANY'S PAY
17 TELEPHONE OPERATION. THEY ARE:

18

19		STANDARD	COMPANY RESULT
20			
21	SERVICE ABILITY	100%	98.4%
22	NO CURRENT DIRECTORY	100%	98.3%
23	NO TELE. NUMBER LISTED	100%	99.7%
24	NO DIAL INSTRUCTIONS	100%	99.7%
25	INADEQUATE LIGHTING	100%	99.7%

1	NO ADDRESS ON PHONE	100%	97.3%
2	AUTOMATIC COIN RETURN	100%	97.3%
3	HANDICAPPED ACCESS	100%	78.4%

4

5 AS THE COMPANY EXPLAINED TO THE COMMISSION IN OUR
6 RESPONSE DATED DECEMBER 18, 1992, TO THIS SERVICE
7 EVALUATION,

8

9 "WITH REGARD TO THE PAY TELEPHONES THAT WERE
10 OUT-OF-SERVICE, MISSING DIRECTORIES, OR WHICH
11 WERE WITHOUT COMPLETE ADDRESS INFORMATION, WE
12 BELIEVE THE SERVICE EVALUATION SHOWS THAT
13 SOUTHERN BELL IS DOING AN EXCELLENT JOB OF
14 PROVIDING SERVICE. PAY TELEPHONES ARE
15 CONSTANTLY ABUSED, YET IN SUBSTANTIALLY ALL
16 INSTANCES WE WERE IN COMPLIANCE WITH RULES.

17

18 "FOR INSTANCE, OF THE (304) PAY PHONES REVIEWED
19 BY STAFF, ONLY FIVE WERE FOUND OUT-OF-SERVICE
20 (SERVICEABILITY). OF THE (302) PAY PHONES
21 REVIEWED BY THE STAFF FOR CURRENT DIRECTORIES
22 ONLY FIVE WERE MISSING DIRECTORIES. OF THE
23 (301) PAY PHONES REVIEWED BY THE STAFF FOR
24 ADDRESS/LOCATION ALL HAD ADDRESS/LOCATION
25 INFORMATION, HOWEVER, THE STAFF IDENTIFIED ONLY

1 NINE THAT PURPORTEDLY NEEDED ADDITIONAL
2 INFORMATION. WE WILL REDOUBLE OUR EFFORTS IN
3 THIS AREA. HOWEVER, IT IS SIMPLY UNREASONABLE
4 TO EXPECT A HIGHER LEVEL OF COMPLIANCE.

5
6 "ALL HANDICAP VARIANCES WERE CORRECTED
7 IMMEDIATELY. SOUTHERN BELL HAS AN ONGOING
8 PROGRAM OF BRINGING ALL PUBLIC TELEPHONES INTO
9 COMPLIANCE WITH HANDICAP REGULATIONS, INCLUDING
10 EVEN THOSE THAT ARE GRANDFATHERED. WE ARE
11 CORRECTING ALL THE GRANDFATHERED LOCATIONS AND
12 ARE SIGNIFICANTLY AHEAD OF THE INDUSTRY IN
13 BRINGING OUR COMPANY IN COMPLIANCE WITH THIS
14 RULE.

15
16 "THE LAKE CITY OPERATOR COIN RETURN TROUBLE WAS
17 ISOLATED TO A SUBSCRIBER LOOP CARRIER (SLC)
18 PROBLEM AND HAS BEEN CORRECTED.

19
20 "WE REPLACE ALL MISSING DIRECTORIES AS SOON AS
21 WE BECOME AWARE OF THE LACK OF A DIRECTORY IN A
22 LOCATION REQUIRED TO HAVE ONE. THE LOSS OF
23 THESE DIRECTORIES, AS WELL AS DAMAGE TO BOOTH
24 LIGHTING, ARE GENERALLY A CASE OF VANDALISM.

25

1 "ALL PHONES (100%) HAD ADDRESS LOCATION
2 INFORMATION, HOWEVER, THE STAFF IDENTIFIED (9)
3 WITH "INADEQUATE" INFORMATION. THESE HAVE BEEN
4 AUGMENTED WITH THE ADDITIONAL LOCATION
5 INFORMATION".

6
7 THE RESULTS OF THIS REVIEW WITH RESPECT TO SOUTHERN
8 BELL'S PAY TELEPHONES, ALTHOUGH NOT PERFECT, WAS
9 NONETHELESS EXCELLENT. IT IS HARD TO IMAGINE THAT
10 ANY COMPANY'S RESULTS COULD BE BETTER. THEREFORE,
11 SOUTHERN BELL'S RESULTS IN THIS AREA SHOULD BE
12 CONSIDERED SATISFACTORY.

13

14 Q. YOU HAVE DESCRIBED 8 OF THE UNSATISFACTORY AREAS, CAN
15 YOU ADDRESS THE REMAINING ONES?

16

17 A. YES. THE REMAINING AREAS ARE:

- 18 1. PERIODIC REPORTS
- 19 2. INCORRECTLY DIALED CALLS
- 20 3. REPAIR SERVICE-OOS RESTORAL-SAME DAY
- 21 4. 911 SERVICE
- 22 5. SAFETY-SAFE PLANT CONDITIONS-WITHIN PAST 12 MOS.
- 23 6. ANSWER TIME-REPAIR SERVICE
- 24 7. ANSWER TIME-BUSINESS OFFICE
- 25 8. REPAIR SERVICE-REBATES-OVER 24 HOURS

1

2 IT APPEARS THAT THE STAFF HAS BASED ITS DETERMINATION
3 THAT THE COMPANY'S SERVICE LEVEL IS UNSATISFACTORY
4 BASED ON BUSINESS OFFICE AND REPAIR SERVICE ANSWER
5 TIMES AND DETERMINATION OF OUT OF SERVICE ("OOS")
6 TROUBLES ELIGIBLE FOR REBATES. A CLOSER EXAMINATION OF
7 THE COMPANY'S RESULTS, HOWEVER, DOES NOT SUPPORT SUCH A
8 CONCLUSION.

9

10 DURING THE PAST SEVERAL YEARS, SOUTHERN BELL DETERMINED
11 THAT OUR ANSWER TIME PERFORMANCE FOR BOTH THE BUSINESS
12 OFFICE AND REPAIR SERVICE WAS BECOMING HARDER TO
13 MAINTAIN AT A SATISFACTORY LEVEL AS A RESULT OF
14 INCREASES IN OUR CUSTOMER BASE CREATING A HIGHER VOLUME
15 OF CALLS. TO MEET THE NEEDS OF OUR CUSTOMERS, SOUTHERN
16 BELL DEPLOYED AN AUTOMATED INTERACTIVE ANSWERING
17 SYSTEM. THE FIRST TRIAL OF THIS DIGITAL VOICE MENU
18 DRIVEN SYSTEM FOR REPAIR SERVICE WAS IN 1988, AND IT
19 WAS DEPLOYED STATE WIDE IN 1989. IN 1991, A BUSINESS
20 OFFICE AUTOMATED "SCREENER," WHICH IS DESIGNED TO
21 DIRECT THE CUSTOMER TO THE COMPANY GROUP OR DEPARTMENT
22 MOST LIKELY TO HELP THE CUSTOMER WITH HIS PROBLEM, WAS
23 IMPLEMENTED IN 1991.

24

25 FROM THE FIRST USE OF THESE SYSTEMS, SOUTHERN BELL

1 BELIEVED THAT THEY MET THE REQUIREMENTS OF THE PREVIOUS
2 VERSION OF COMMISSION RULE 25-4.073, WHICH REQUIRED
3 THAT A CUSTOMER BE ANSWERED BY THE COMPANY WITHIN 20
4 SECONDS OF THE FIRST AUDIBLE RING. THE AUTOMATED
5 SYSTEMS FOR BOTH REPAIR SERVICE AND THE BUSINESS OFFICE
6 MET THE CRITERION FOUND IN RULE 25-4.073 THAT STATED,
7 "THE TERM ANSWERED AS USED IN SUBPARAGRAPHS A AND B
8 ABOVE SHALL BE CONSTRUED TO MEAN MORE THAN AN
9 ACKNOWLEDGMENT THAT THE CUSTOMER IS WAITING ON THE
10 LINE." THESE SYSTEMS ALLOW THE CUSTOMER TO REPORT
11 TROUBLES OR TO DIRECT HIS CALL TO THE GROUP RESPONSIBLE
12 FOR RESOLVING HIS QUESTION OR PROBLEM. THE COMPANY WAS
13 THUS IN 100% COMPLIANCE WITH THE COMMISSION'S PRIOR
14 RULE. NONETHELESS, THE STAFF FOUND THE COMPANY TO BE
15 UNSATISFACTORY IN THE GAINESVILLE SERVICE EVALUATION
16 PERFORMED IN 1990 BECAUSE AN ATTENDANT DID NOT ANSWER
17 WITHIN 20 SECONDS. ALTHOUGH SOUTHERN BELL DISAGREED
18 WITH THIS INTERPRETATION, IT WORKED DILIGENTLY WITH THE
19 COMMISSION STAFF TO SHORTEN THE INTRODUCTION TO THE
20 REPAIR SYSTEM MESSAGE SO THAT CUSTOMERS WITHOUT
21 TOUCH-TONE PHONES WOULD BE ANSWERED BY AN ATTENDANT
22 WITHIN 20 SECONDS OF THE FIRST AUDIBLE RING.

23

24 NOT ALL MEMBERS OF THE STAFF BELIEVED THAT THE USE OF
25 THESE SYSTEMS WAS INAPPROPRIATE. FOR EXAMPLE, IN 1991

1 A COMMISSION MANAGEMENT AUDIT OF THE COMPANY, PERFORMED
2 BY THE BUREAU OF MANAGEMENT STUDIES, SPECIFICALLY FOUND
3 THAT WE SHOULD INCREASE THE CUSTOMER USAGE OF THE
4 AUTOMATED SYSTEMS TO ATTAIN OUR OBJECTIVE OF 25% USAGE.
5
6 BECAUSE OF THE DIFFERENCE OF OPINION IN REGARD TO THESE
7 AUTOMATED SYSTEMS, SOUTHERN BELL PETITIONED THE
8 COMMISSION FOR A CHANGE IN THE ANSWERING TIME RULE. THE
9 NEW RULE, WHICH BECAME EFFECTIVE ON NOVEMBER 24, 1992,
10 TIGHTENED THE REQUIREMENTS FOR AUTOMATED MENU DRIVEN
11 SYSTEMS. THE NEW RULE SETS THE PERCENTAGES OF CALLS
12 THAT MUST BE ANSWERED WITHIN A SPECIFIED TIME FOR
13 COMPANIES USING AN AUTOMATED SYSTEM AS FOLLOWS: 95%,
14 UP FROM 90%, FOR REPAIR, OPERATOR SERVICE, AND
15 DIRECTORY SERVICE AND 85%, UP FROM 80%, FOR THE
16 BUSINESS OFFICE. ALSO, CALLS MUST BE INITIALLY
17 ANSWERED BY THE SYSTEM WITHIN 15 SECONDS 95% OF THE
18 TIME.
19
20 IF A CUSTOMER CANNOT OR CHOOSES NOT TO USE THE SYSTEM,
21 THE COMPANY HAS 55 SECONDS WITHIN WHICH TO ANSWER THE
22 CUSTOMER WITH AN ATTENDANT OR SERVICE REPRESENTATIVE
23 FROM THE TIME OF THE LAST DIGIT DIALED. WHILE THERE
24 WAS DISCUSSION CONCERNING THE FACT THAT IT WOULD TAKE
25 ABOUT 5 SECONDS FROM THE END OF A MESSAGE FOR THE

1 SYSTEM TO RECOGNIZE A FAILURE BY THE CUSTOMER TO PRESS
2 A DIGIT AND ANOTHER 5 SECONDS TO TRANSFER HIM OUT OF
3 THE SYSTEM, THIS TEN SECOND PERIOD WAS NEVER DETERMINED
4 TO BE A MEASUREMENT STANDING ALONE. RATHER, IT WAS
5 INCLUDED IN THE OVERALL 55 SECONDS THAT THE COMPANY HAS
6 TO ANSWER THE CUSTOMER ONCE HE STOPS INTERACTING WITH
7 THE SYSTEM. THUS THE STAFF'S DATA DO NOT SUPPORT A
8 FINDING THAT SOUTHERN BELL IS NOT IN COMPLIANCE WITH
9 THE RULE.

10

11 IN REGARD TO THE QUESTION OF REBATES, MR. MCDONALD
12 FAILS TO MENTION THAT OF 99 CUSTOMERS ELIGIBLE FOR
13 REBATES IN ORLANDO, WE WERE FOUND TO BE 100%
14 SATISFACTORY. THE STAFF FOUND THAT SOME CUSTOMERS IN
15 GAINESVILLE DID NOT RECEIVE REBATES TO WHICH THE STAFF
16 BELIEVES THEY WERE ENTITLED. SOUTHERN BELL
17 RESPECTFULLY DISAGREES WITH THE STAFF'S INTERPRETATION
18 OF THE PERTINENT RULE. AS EXPLAINED IN THE COMPANY'S
19 RESPONSE TO THE SERVICE EVALUATION, "IN THE ORLANDO
20 REVIEW THE STAFF REQUESTED REBATE RECORDS ON (99)
21 OUT-OF-SERVICE REPORTS. 100% OF THE REBATES WERE
22 PROPERLY PROVIDED TO THE CUSTOMERS. IN GAINESVILLE, THE
23 STAFF REQUESTED REBATE RECORDS ON (20) OUT-OF-SERVICE
24 REPORTS. 100% OF THE CUSTOMER ELIGIBLE FOR A REBATE
25 WERE PROVIDED A REBATE. EIGHT CUSTOMERS WERE

1 IDENTIFIED AS NOT BEING ELIGIBLE FOR A REBATE. FOUR
2 TROUBLE REPORTS WERE NOT TESTED OUT-OF-SERVICE AND
3 DISCUSSIONS WITH THE CUSTOMER AFTER THE INITIAL REPORT
4 SUPPORTED THAT DETERMINATION. FOUR TROUBLE REPORTS
5 WERE A RESULT OF CPE (CUSTOMER PROVIDED_EQUIPMENT) WIRE
6 OR EQUIPMENT. WE ARE NOT REQUIRED BY THE COMMISSION'S
7 RULE TO REBATE CPE CAUSED TROUBLES".

8
9 SOUTHERN BELL BASED ITS RESPONSE ON RULE
10 25-4.070(1)(b), WHICH STATES, "IN THE EVENT A
11 SUBSCRIBER'S SERVICE IS INTERRUPTED OTHERWISE THAN BY
12 NEGLIGENCE OR WILLFUL ACT OF THE SUBSCRIBER AND IT
13 REMAINS OUT OF SERVICE IN EXCESS OF 24 HOURS AFTER
14 BEING REPORTED TO THE COMPANY, AN APPROPRIATE
15 ADJUSTMENT OR REFUND SHALL BE MADE TO THE SUBSCRIBER
16 AUTOMATICALLY, PURSUANT TO RULE 25-4.110 (CUSTOMER
17 BILLING). SERVICE INTERRUPTION TIME WILL BE COMPUTED
18 ON A CONTINUOUS BASIS, SUNDAYS AND HOLIDAYS INCLUDED.
19 ALSO, IF THE COMPANY FINDS THAT IT IS THE CUSTOMERS
20 RESPONSIBILITY TO CORRECT THE TROUBLE, IT MUST NOTIFY
21 OR ATTEMPT TO NOTIFY THE CUSTOMER WITHIN 24 HOURS AFTER
22 THE TROUBLE WAS REPORTED". THIS RULE THUS REQUIRES
23 ONLY THAT THE COMPANY NOTIFY A CUSTOMER WITHIN 24 HOURS
24 THAT HIS PROBLEM IS IN HIS CPE OR OTHERWISE IS HIS
25 RESPONSIBILITY. IT DOES NOT REQUIRE A REBATE IF THE

1 COMPANY FAILS TO SO NOTIFY THE CUSTOMER.

2

3 Q. WHAT ABOUT THE OTHER FIVE ITEMS FOR WHICH THE STAFF
4 FOUND PROBLEMS?

5

6 A. THE REMAINING FIVE ITEMS ARE 911 SERVICE, SAFETY,
7 PERIODIC REPORTS, INCORRECTLY DIALED CALLS, AND REPAIR
8 SERVICE SAME DAY RESTORAL. EACH ARE DISCUSSED BELOW:

9

10 PERIODIC REPORTS. ALTHOUGH FILED ON TIME, THE
11 SECOND QUARTER 1992 QUALITY OF SERVICE REPORT
12 (PERIODIC REPORT) DID NOT CONTAIN THE INFORMATION FOR
13 SCHEDULE 11.

14

15 THE COMPANY HAD DETERMINED THAT THE INFORMATION
16 UNDERLYING A SCHEDULE 11 WAS INCORRECT BECAUSE OF A
17 DATA PROBLEM. I INFORMED THE STAFF OF THE PROBLEM AND
18 REQUESTED A THIRTY DAY EXTENSION TO FILE THE REPORT.
19 THE CORRECTED REPORT WAS SUBSEQUENTLY FILED IN OCTOBER.
20 THIS DELAY, WHICH WAS CAUSED BY THE COMPANY'S WISHING
21 TO FILE CORRECT DATA, HAS NOW RESULTED IN THE COMPANY
22 BEING FOUND UNSATISFACTORY. THIS IS NOT APPROPRIATE.

23

24 SAFETY. OVER THE PAST TWELVE MONTHS, EMPLOYEES OF THE
25 DIVISION OF ELECTRIC AND GAS HAVE MADE SAFETY

1 EVALUATIONS OF OUTSIDE PLANT CONDITIONS. AS THEY
2 MAKE THEIR INSPECTIONS, ALL VARIANCES ARE NOTED AND
3 REFERRED TO THE POWER COMPANIES OR LOCAL EXCHANGE
4 COMPANIES AS APPROPRIATE. WE HAVE RECEIVED
5 CORRESPONDENCE FROM THE STAFF CONCERNING SAFETY
6 VARIANCES TO DETERMINE IF THEY STILL EXISTED AND, IF
7 SO, WHEN WE PLANNED CORRECTIVE ACTION. WE HAVE TIMELY
8 RESPONDED TO THESE INQUIRIES. HOWEVER, SINCE WE HAVE
9 HAD VARIANCES REPORTED, WE HAVE BEEN FOUND TO BE
10 UNSATISFACTORY FOR THIS ITEM.

11

12 911 SERVICE. THIS FINDING SEEMS CRITICAL OF THE 911
13 AGENCIES AS OPPOSED TO OUR COMPANY.

14

15 INCORRECTLY DIALED CALLS. TWO CALL ATTEMPTS OUT OF OUR
16 PINE HILLS OFFICE REACHED A REORDER SIGNAL. THIS WAS
17 THE RESULT OF A BAD ANNOUNCEMENT TRUNK WHICH WAS
18 REPAIRED IMMEDIATELY.

19

20 REPAIR SERVICE-OOS SAME DAY RESTORAL. THIS IS NOT A
21 COMMISSION RULE BUT A RECOMMENDATION OF A STANDARD
22 SUGGESTED BY THE STAFF. THE STAFF PROPOSES THAT THE
23 COMPANY BE REQUIRED TO CLEAR 80% OF ALL OOS TROUBLES
24 THE SAME DAY THE TROUBLE REPORT IS RECEIVED. THIS IS
25 NOT A COMMISSION RULE, AND IT IS THEREFORE

1 INAPPROPRIATE TO STATE THAT SOUTHERN BELL'S SERVICE IS
2 UNSATISFACTORY FOR ITS FAILURE TO COMPLY WITH A
3 NON-EXISTENT RULE.

4

5 Q. IN MR. MCDONALD'S TESTIMONY (PAGES 6 AND 10), HE
6 INDICATES THAT HE PERFORMED A WEIGHTED INDEX
7 MEASUREMENT TO EVALUATE THE COMPANY'S PERFORMANCE. DID
8 YOU RECALCULATE THIS MEASUREMENT BASED ON THE COMPANY'S
9 BELIEF THAT IT MET THE ANSWER TIME RULE?

10

11 A. YES. IN MR. MCDONALD'S ATTACHMENT DBM-5, HE CALCULATED
12 THE INDEX USING THE OLD ANSWERING TIME RULE AND
13 DETERMINED AN OVERALL SCORE OF 34.55. RECALCULATING THE
14 INDEX USING A 95% (NOT 100%) RESULT FOR REPAIR AND A
15 85% RESULT FOR THE BUSINESS OFFICE AS WE BELIEVE WE
16 OBTAINED, OUR OVERALL SCORE IS 80.33.

17

18 WHEN MR. MCDONALD USES THE NEW RULE AND COMPUTES THE
19 OVERALL SCORE, HE DETERMINED THE COMPANY'S OVERALL
20 SCORE TO BE 68.38. SINCE OUR MEASUREMENT OF OUR ANSWER
21 TIME PERFORMANCE HAS BEEN 100% UNDER THE NEW RULE, I
22 RECALCULATED USING A 100% RESULT FOR BOTH REPAIR
23 SERVICE AND BUSINESS OFFICE ANSWER TIME. THE OVERALL
24 SCORE WOULD THEN BE 90.62, SUBSTANTIALLY ABOVE THE 75
25 MINIMUM SCORE FOR SATISFACTORY PERFORMANCE.

1

2 THUS, IF MR. MCDONALD HAD USED THE CORRECT ANSWER TIME
3 RESULT, HE WOULD HAVE DETERMINED THAT THE COMPANY WAS
4 MORE THAN SATISFACTORY WITH AT LEAST AN 80.33 AND UNDER
5 THE NEW RULE, A 90.62 RESULT FOR 1992. THIS
6 DEMONSTRATES THAT THE COMPANY'S SERVICE WAS
7 SATISFACTORY AND NO PENALTY SHOULD BE CONSIDERED BY THE
8 COMMISSION.

9

10 Q. WAS IT APPROPRIATE FOR MR. MCDONALD TO DETERMINE THE
11 COMPANY UNSATISFACTORY BASED, IN PART, ON THE 1992
12 ORLANDO/GAINESVILLE SERVICE EVALUATION?

13

14 A. NO. MR. MCDONALD SHOULD HAVE CONSIDERED OUR CORRECTIVE
15 ACTION AND COMMENTS CONCERNING THE AREAS THE STAFF
16 DEEMED AS LESS THAN SATISFACTORY BEFORE CONDEMNING US
17 IN THIS HEARING. IT IS ONLY FAIR TO ALLOW THE COMPANY
18 TO RESPOND AND FOR THE STAFF THEN TO COMMUNICATE THE
19 ACCEPTANCE OR REJECTION OF THE EXPLANATION OR
20 CORRECTIVE ACTION BEFORE A FINAL CONCLUSION IS REACHED
21 CONCERNING SOUTHERN BELL'S PERFORMANCE. HOWEVER, MR.
22 MCDONALD'S TESTIMONY WAS FILED BEFORE SOUTHERN BELL'S
23 TIMELY RESPONSE TO THE SERVICE EVALUATION WAS PROVIDED
24 TO THE COMMISSION.

25

1 Q. MR. MCDONALD BELIEVES THE COMMISSION SHOULD IMPOSE A
2 PENALTY AS A RESULT OF THE COMPANY'S SERVICE
3 PERFORMANCE, DO YOU AGREE?

4
5 A. I ABSOLUTELY DISAGREE. SOUTHERN BELL'S SERVICE
6 PERFORMANCE HAS BEEN CONSISTENTLY SATISFACTORY OVER THE
7 PAST THREE YEARS. AS SHOWN BY TELSAM, OUR CUSTOMERS
8 BELIEVE THAT WE ARE PROVIDING SATISFACTORY OR BETTER
9 SERVICE. AS I HAVE SHOWN, MR. MCDONALD'S CONCERNS WITH
10 REPAIR SERVICE AND BUSINESS OFFICE ANSWER TIMES, AND
11 REBATES PROVIDED WHEN CUSTOMER PROVIDED EQUIPMENT IS
12 THE CAUSE OF A TROUBLE ARE MISPLACED.

13
14 WE ARE CONCERNED ABOUT ANY SERVICE COMPLAINTS THAT WE
15 RECEIVE. HOWEVER, IN 1991 THE ENTIRE INDUSTRY
16 EXPERIENCED AN INCREASE IN CUSTOMER COMPLAINTS AND
17 SOUTHERN BELL HAS EXPERIENCED A SUBSTANTIAL REDUCTION
18 IN COMPLAINTS IN 1992.

19
20 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

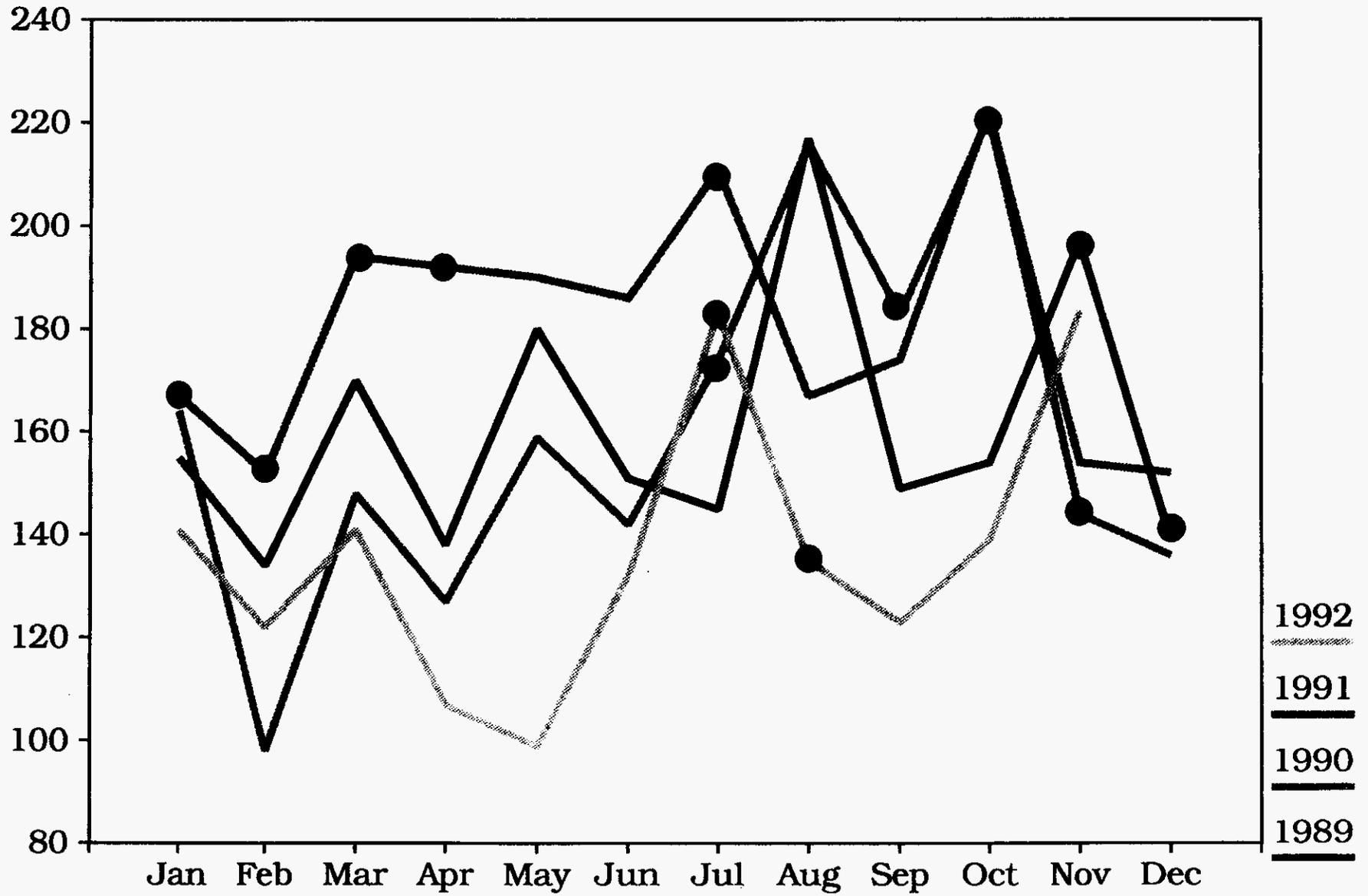
21
22 A. YES.

23

24

25

TOTAL RECEIVED CASES 1989 - 1992 NEGATIVE MEDIA COVERAGE ●

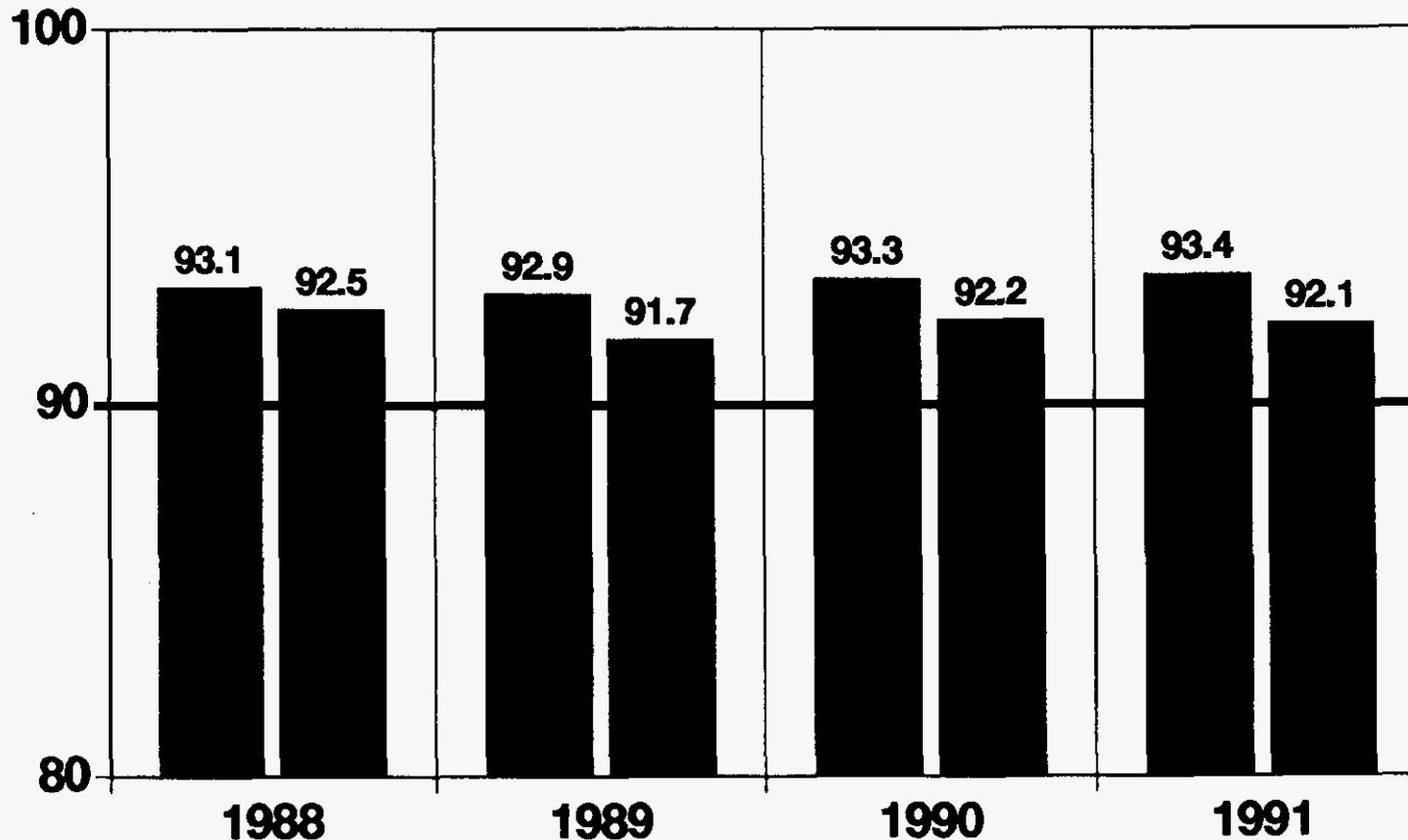


TELSAM RESIDENCE AND BUSINESS

OVERALL SATISFIED SOUTHERN BELL 1988 TO 1991

% SATISFIED

SOUTH OPERATIONS I&M/IMC STAFF



RESIDENCE/BUSINESS OBJECTIVE PRE-1992 90%

