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November 30, 1999

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 991473-TL

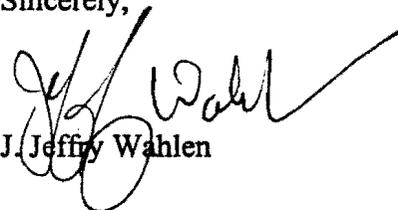
Dear Ms. Bayo:

Enclosed is the original and fifteen (15) copies of the Comments of the Small LEC Coalition.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

JJW/jh

Enclosure

cc: All Parties of Record

DOCUMENT NUMBER-DATE

14575 NOV 30 99

FPC-RECORDS/REPORTING

Before the Florida Public Service Commission

Comments of ALLTEL Florida, Inc., GTC, Inc. d/b/a GTCOM, Northeast Florida Telephone Company, TDS Telecom/Quincy, and Vista-United

Rules 24.4.066 – 25-4.081, and
25-24.049, Florida Administrative Code
Docket No. 991473

ALLTEL Florida, Inc., GTCOM, Northeast Florida Telephone Company, TDS Telecom/Quincy Telephone Company, and Vista-United Telephone Company, hereby submit their comments in response to the Florida Public Service Commission (FPSC) rule development workshop.

Need for Standards

The Commission should refrain from taking any steps in this proceeding to increase the level of service quality standards, especially for small ILECs. If any changes are made, they should be done only to eliminate outdated service quality standards or to minimize the burden of regulations that provide little, if any benefits to consumers. There is no evidence to suggest that there is a need for additional or stricter service quality rules for any or all telecommunications carriers, especially for the small ILECs. The small ILECs have followed the rules and met the standards in the current rules. As a result, the small ILECs have generated few, if any, complaints regarding their service quality at the Commission.

Individual Results Versus Overall Results

The service quality rules should be amended to overall standards for installations, outages, and other service quality measures. The standard could be expressed as averages or percentages so as to eliminate statistical "blips" caused by unusual circumstances. Reporting on averages and percentages would allow carriers to effectively meet the needs of all its customers. For example, we suggest the level of measurement be changed from an "exchange" basis to a "service center" basis. For small local exchange companies, those with less than 100,000 access lines, measurement should be on a "service area" basis.

The current rule requirement puts pressure on the company to direct its resources to the smaller exchanges where missing a small number of out of services results in a missed objective. This redirection of resources may cause a larger number of troubles to be missed in a larger exchange that can bear the

loss without affecting the percentage. This results in an inefficient use of resources, and impacts a larger number of customers.

Transmission Requirements

The Commission should eliminate the rules pertaining to transmission requirements. These current standards have been incorporated in the standard operating systems of the telecommunications companies and there have been no incidents of complaints with regard to infractions. If the Commission determines that the current rule should not be eliminated the Commission should not attempt to increase the level of these standards without additional workshops and a Commission hearing. The current network was designed to carry voice traffic and not data. Any mandate to increase the transmission speed will require that adequate funding is available especially for small ILECs.

Summary

Included in attachment A are suggested changes or recommendations for elimination of certain service quality rules offered by the small ILECs.

ATTACHMENT A

INDIVIDUAL RULE COMMENTS
QUALITY OF SERVICE RULES REVISIONS – DOCKET NO. 991473-TP

Rule 25-4.066 – Availability of Service.

No suggested changes.

Rule 25-4.067 – Extension of Facilities – Contributions in Aid of Construction.

No suggested changes

Rule 25-4.069 – Maintenance of Plant and Equipment.

No suggested changes.

Rule 25-4.070 – Customer Trouble Reports.

25-4.070(1)(b) In the event a subscriber's service is interrupted other than by a negligent or willful act of the subscriber and it remains out of service in excess of 24 hours after being reported to the company, an appropriate adjustment or refund shall be made to the subscriber automatically, pursuant to Rule 25-4.110 (Customer Billing). Service interruption time will be computed on a continuous basis, Sundays and holidays included. Also, if the company finds that it is the customer's responsibility to correct the trouble, it must notify or attempt to notify the customer within 24 hours after the trouble was reported.

25-4.070 (3)(a) Service Interruption: Restoration of interrupted service shall be scheduled to insure at least 95 percent of such reports are cleared within 24 hours of report in each exchange as measured on a monthly basis. For any exchange failing to meet this objective, the company shall provide an explanation with its periodic report to the Commission.

25-4.070(3)(b) Service Affecting: Clearing of service affecting trouble reports shall be scheduled to insure at least 95 percent of such reports are cleared within 72 hours of the report in each exchange as measured on a monthly basis.

Comment: The small LECs suggest the level of measurement be changed from an "exchange" basis to a "service center" basis. For small local exchange companies, those with less than 100,000 access lines, measurement should be on a "service area" basis.

Also, if at the time of reporting a trouble, the customer requests an appointment for repair of his out of service, outside the 24 hour period, this report should be exempted from the requirements of the rules cited above, with regard to out of services over 24 hours and rebates.

Discussion: The current rule requirement puts pressure on the company to direct its resources to the smaller exchanges where missing a small number of out of services results in a missed objective. This redirection of resources may cause a larger number of troubles to be missed in a larger exchange that can bear the loss without affecting the percentage. This results in an inefficient use of resources, and impacts a larger number of customers.

With regard to the second point, we do not believe it appropriate to penalize a company for exceeding the 24 hour repair time when the delay was specifically at the request of the customer.

25-4.070(5) Repeat Trouble: Each telephone company shall establish procedures to insure the prompt investigation and correction of repeat trouble reports such that the percentage of repeat troubles will not exceed 20 percent of the total initial customer reports in each exchange when measured on a monthly basis. A repeat trouble report is another report involving the same item of plant within 30 days of the initial report.

(6) The service objectives of this rule shall not apply to subsequent customer reports (not to be confused with repeat trouble reports), emergency situations, such as unavoidable casualties where at least 10 percent of an exchange is out of service.

Comment: We believe this rule should be eliminated. There is no reporting requirement and there have been no incidents of complaints relative to infractions.

25-4.071 Adequacy of Service. (1) Each telecommunications company shall provide switching equipment, trunking, and associated facilities within its operating territory for the handling of local and toll traffic, designed and engineered on the basis of realistic forecasts of growth so that during the average busy season busy hour at least 97 percent of all calls offered to any trunk group (toll connecting, inter-office, extended area service) shall not encounter an all-trunk busy condition.

(2) Telephone calls to valid numbers should encounter a ring-back tone, line busy signal, or non-working number intercept facility (operator or recording) after completion of dialing. The call completion standards established for such calls by category of call is as follows:

(a) Intra-office calls – 95 percent,

- (b) Inter-office calls – 95 percent,
 - (c) Extended area calls – 95 percent,
 - (d) Intra-LATA DDD calls – 95 percent.
- (3) All telephone calls to invalid telephone numbers shall encounter an operator or suitable recorded intercept facility, preferably a recording other than the non-working number recording used for valid number calls.
- (4) Intercept service shall be as outlined in Rule 25-4.074.
- (5) A line busy signal (60 impulse per minute tone) shall not be used for any signaling purpose except to denote that a subscriber's line, other valid terminal, centrex or PBX trunks, or equipment where the quantity is controlled by the customer is in use.

Comment: We believe this entire section should be eliminated. These are standards that have been incorporated by the industry and are inherent with today's technology.

25-4.072 Transmission Requirements. (1) Telecommunications companies shall furnish and maintain the necessary, plant, equipment, and facilities to provide modern, adequate sufficient, and efficient transmission of communications between customers in their service areas. Transmission shall be at adequate volume levels and free of excessive distortion. Levels of noise and crosstalk shall be such as not to impair communications. The maximum loss objective of inter-toll trunks shall be consistent with the requirements of the nationwide switching plan and overall transmission losses within each trunk group will not vary more than plus or minus two db.

- (2) Accurate dependable milliwatt supplies shall be made a part of each central office. Additionally, for those central offices having an installed line capacity of 1,000 lines or more, the buffered access on a minimum three line rotary group basis shall be a part of the milliwatt supply.
- (3) Each central office shall be equipped with a minimum of one termination which shall trip ringing and terminate the line on a balanced basis so that end to end noise measurements may be made.

Comment: We believe this entire section should be eliminated. These are standards that have been incorporated in the standard operating systems of the telecommunications companies and there have been no incidents of complaints with regard to infractions.

25-4.073 Answering Time. (d) Notwithstanding © above, when a company utilizes a menu driven, automated, interactive answering system (referred to as the system), at least (95%) percent of the calls offered shall

be answered within 15 seconds after the last digit is dialed. The initial recorded message presented by the system to the customer shall only identify the company and the general options available to the customer. The option of transferring to a live attendant shall be included in the initial message. For subscribers electing the option of transferring to a live assistant, except for business office calls, at least ninety-five (95%) percent of all calls shall be transferred by the system to a live attendant prepared to give immediate assistance within fifty-five (55) seconds after the last digit of the telephone number listed in the directory for the company's service (s) was dialed. Eighty-five (85%) percent of all such calls directed to any business office shall be transferred by the system to a live attendant within fifty-five (55) seconds after the last digit is dialed. At any time during the call, the customer shall be transferred to live assistance if the customer fails to interact with the system for a time period of (10) seconds following any prompt. For the purposes of this section, interaction means responding to a customer prompt offered by the system by keying (pressing) a number or character of a Dual-Tone Multiple-Frequency (DTMF) keypad associated with a telephone.

Comment: We believe the measurement should be changed from meeting a % of calls answered in 55 seconds, to an Average Speed of Answer for the month. We believe 60 seconds would be an appropriate ASA. The measurement would be more accurately measured if it could be done based on the time the selection is made to go to a live attendant.

25-4.80 Weighted Measurement of Quality of Service. In considering the adequacy of service provided by a local exchange company, the Commission may utilize a weighted index system developed by the Public Utility Research Center. Under this weighting system, a company exactly meeting all FPSC standards on all criteria would receive an overall satisfactory rating of 75 points. Using indices assigned to each criterion, adjustments to the base of 75 would be made on all results that either exceed or fall below the standards. The criteria and indices are contained in the Weighted Index (Form CMU-41, 4/1/93), which is incorporated by reference into this rule. Local exchange companies shall be responsible for complying with each service standard, whether or not an overall score of 75 or more is achieved when the weighted index is employed.

Comment: This rule should be eliminated. With any changes to the rules, the whole weighted index measurement would have to be recalculated. Additionally, this rule was developed in a rate of return environment and is no longer appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 30th day of November, 1999, to the following:

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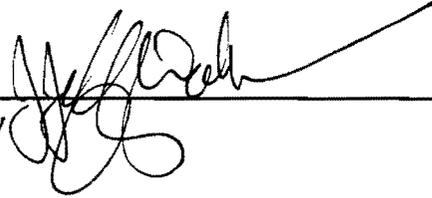
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Attorney

A handwritten signature in black ink, appearing to read "M. A. Gross", is written over a horizontal line. The signature is cursive and extends to the right of the line.