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June 26, 2009

REDACTED

Ms. Ann Cole  
Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Undocketed Matter: Service Evaluation- 2009**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's response to Staff's April 17, 2009 draft Service Evaluation report. Pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, AT&T Florida hereby makes a claim of confidentiality for the responses. The responses contain proprietary confidential customer specific business information.

Sincerely,

MaryRose Sirianni

- COM \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCP \_\_\_\_\_
- SSC   1
- SGA \_\_\_\_\_
- ADM \_\_\_\_\_
- CLK \_\_\_\_\_

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK



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Greg Follensbee  
Executive Director  
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June 26, 2009

Mr. Rick Moses, Chief  
Bureau of Service Quality  
Division of Service, Safety & Consumer Assistance  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Dear Mr. Moses:

This is in response to your letter dated April 17, 2009 where you requested that AT&T Florida respond to the "draft" report for the service evaluation conducted by your staff during the period June 16 to July 23, 2008.

Overall AT&T Florida performed extremely well in all areas reviewed by the staff. There are six areas I will address in this response. They are: 1. adequacy of Directory Services; 2. Subscriber Loops; 3. Repair Services; 4. Timing and Billing Accuracy; 5. 911 Emergency Service (TDD calls), and 6. Service Guarantee Program (SGP) rebates.

The staff states on page 2 that they found two instances for the 12 month period from April 2007 through March 2008 where the periodic reports reviewed did not match the results obtained in the service evaluation. In both cases, the difference between the periodic reports filed for the quarterly quality of service reports and the 2008 evaluation results are due to the differences in the criteria used to pull the data for the 2008 evaluation as opposed to the criteria used to generate the periodic reports. For example, the Out Of Service ("OOS") data in your report includes all disposition codes, whereas the quarterly Schedule 11 reports (OOS troubles and Service Affecting troubles) only include network disposition codes. Additionally, Schedule 11 excludes type code 5-Memory Call, which was included in the 2008 evaluation criteria. Due to the variations in the criteria used to generate the two reports, differences exist when comparing the periodic report and the 2008 evaluation results.

### **Adequacy of Directory Services**

#### Directory Review

Staff noted concerns with the prices for Directory Assistance in the phone books versus the prices listed in AT&T Florida's tariffs. The directory assistance (DA) charge was increased to \$1.25 effective August 4, 2006. The DA rate was later increased to \$1.35 effective August 4, 2007, and increased again to \$1.50 on July 15, 2008 (see attached tariff pages). The amount listed in the directory is dependent on the issuance date of the directories. If the directory was a 2007/2008 directory issued prior to the August 2007 increase, the correct DA rate was \$1.25 with up to two listing requests allowed per call.



If the directory was issued after the August 2007 rate took effect, then the rate shown in the directory should have been \$1.35 with up to two listing requests allowed per call. AT&T Florida has taken steps to insure future directories reflect the tariffed rates in effect when the directories are published.

#### New Numbers in Directory Assistance

The staff stated that 7 numbers were not correctly provided when requested during the service evaluation. The following is an explanation of each number and the reason as to why the number was not obtained when requested.

- |    | <u>Telephone number</u> | <u>Service Order completed</u> |
|----|-------------------------|--------------------------------|
| 1. | ██████████              | June 16, 2008                  |

Operator said it was non-published, but service order doesn't show as non-published.

**Response:** The "T" order completed on June 16, 2008 establishing a published listing for "██████████". Immediately following, a "C" order was issued making this listing non-published. The service was disconnected and the listing removed on July 8, 2008.

- |    |            |               |
|----|------------|---------------|
| 2. | ██████████ | June 11, 2008 |
|----|------------|---------------|

Operator gave 747-9025 as a listing.

**Response:** The Listing customer "██████████" had two listings, ██████████. The Operator correctly provided the first listing on screen, which is ██████████.

- |    |            |               |
|----|------------|---------------|
| 3. | ██████████ | June 20, 2008 |
|----|------------|---------------|

The operator gave a different number when the TDD DA was called of ██████████. No listing found to the voice operator.

**Response:** The number is listed to "██████████" with service order date in DA as of June 20, 2008. There was some confusion as to the spelling of this name initially. The number given of ██████████ was listed to "██████████." While the number was not found by the staff, the AT&T representative working with the PSC staff called DA and was given the correct number (██████████). No subsequent service order activity has processed on this listing since.

- |    |              |               |
|----|--------------|---------------|
| 4. | 850-588-8529 | June 12, 2008 |
|----|--------------|---------------|

Number not found.

**Response:** Listing is for ██████████, and the service order was listed to DA June 20, 2008. There was confusion on the pronunciation of the last name, it is "██████████". The AT&T representative working with the PSC staff made a test call to DA that day, careful to get the pronunciation correct, and



was provided the correct listing. A subsequent order has processed, disconnecting the service and removing the listing as of November 11, 2008.

5. [REDACTED] June 26, 2008

No listing found.

**Response:** This service order did not list because it had a class of service assigned (SAFAL) to an account that is a DSL line only. AT&T Florida does not list numbers for DSL service since no dial tone is provided to these numbers.

6. [REDACTED] June 24, 2008

Number not found.

**Response:** The "T" order established service and listing for "[REDACTED]" on June 25, 2008. The Customer has subsequently moved and has kept the same number, but no longer lists a physical address.

7. [REDACTED] June 23, 2008

Should be non-published, but operator said no listing.

**Response:** An order placed a non-published listing for [REDACTED] moving from Lynn Haven to Panama City on June 23, 2008.

## Subscriber Loops

### Transmission

Of the 499 loops tested by staff for transmission requirements, forty-five (45) were deemed unsatisfactory. AT&T sent Facility Technicians out to retest the lines cited by staff and below is a summary of what was found. The majority of the findings appear to be related to the sandy soil and the inability to get a good ground in sandy terrain. AT&T has made a formal request to our South East Regional Analyst Organization (SERAO) to run a detailed analysis on all of the affected lines to determine if there is a pattern that will warrant additional action.

Listed below is the action taken by AT&T to address each central office.

**Vernon** - 4 troubles; 1 no longer in service, 3 no troubles found and the high noise levels were sent to the SERAO for further analysis and no pattern was found that warrants additional action.

**Sunny Hills** - 6 troubles; 2 no longer in service, the other 4 have been repaired by rebuilding a wet splice.

**Panama City Beach** - 12 troubles; 9 of these have been isolated to a cross box that was damaged by a fallen tree, and the cross box is under review to be replaced.



**Panama City** - 11 troubles; no pattern found for any of these, and the affected counts were sent to the SERAO for further analysis and no pattern was found that warrants additional action.

**Lynn Haven** - 12 troubles; no pattern found for any of these, and the affected counts were sent to the SERAO for further analysis and no pattern was found that warrants additional action.

### Repair Service

#### Out of Service Reports restored within 24 hours

Staff reviewed the fourth quarter of 2007 and the first quarter of 2008 for the five exchanges. AT&T Florida's dispatch strategy is designed to meet customers' expectations, to increase efficiencies and to increase customer satisfaction. AT&T Florida operates under a Service Guarantee Program (SGP) and provides rebates directly to its customers when it fails to meet the objectives of the SGP.

#### Rebates Required by Rule

AT&T Florida statuses a customer's service as OOS based on the customer's report, line test results, and what a technician determines to be the cause of the trouble in the field. The staff found that of the 770 rebates due customers pursuant to rule, AT&T provided credits to 731 customers. Fifteen (15) were initially marked as OOS "no"; however, after further investigation it was determined that they were coded incorrectly and should have been OOS "yes". The appropriate credits have been provided to these accounts.

The remaining twenty four (24) lines where no credits were provided represent situations where AT&T Florida and the Commission differ on whether or not the customer was OOS based on the Commission rule. AT&T does not believe that the customer was OOS. It is AT&T's policy to base a determination of an OOS condition on whether or not the customer's line is actually capable of handling incoming or outgoing calls. When a customer calls in their trouble report a series of automated tests are performed on the customers' line (with the customer on the line, if possible) to determine if the customers' line is OOS (if incoming and outgoing calls are handled successfully). If the result of these tests indicates that the trouble is not on the line, the trouble report is not marked OOS and handled appropriately. In spite of AT&T Florida's disagreement with the staff's interpretation of the rule, AT&T Florida will provide the SGP credit for each of these.

Adjustment provided-coded incorrectly: --

1. Panama City (10 accounts)

[REDACTED]

2. Vernon (1 account)

[REDACTED]

3. Lynn Haven (4 accounts)



[REDACTED]

## **Timing and Billing Accuracy**

### Directory Assistance Billing

The staff made local DA calls and states that AT&T did not bill per tariff or the amount listed in its directories. As described on pages 1 and 2, the rate in the directory is dependent on the issuance date of the directory. Additionally, AT&T billed the correct tariff price in effect when the test calls were made which was \$1.50.

## **9-1-1 Emergency Services**

### TDD Calls

Of the 50 calls to 9-1-1 services using TDD, three went to a fast busy and failed. The TDD calls were made through the Florida Relay service provided by Sprint, not AT&T Florida. AT&T Florida is not responsible for another carrier's network issues and no finding was made that the blockage occurred in AT&T Florida's network.

## **Service Guarantee Program (SGP) Rebates**

### Installation SGP Rebates

AT&T Florida provides automatic Service Guarantee credits for missed commitments for the installation of primary and additional residential line service. The staff found a total of twelve (12) instances where installation credits were due to customers, and in these cases AT&T Florida had provided eight (8) customers installation credits. In four (4) instances where no credit was provided, the service orders were coded as "Company Facilities." AT&T explained no company facilities were available because the assigned cable pairs were defective and no spare cable pairs were available. Staff disagreed that coding the service orders to "Company Facilities" did not entitle the customer to an installation SGP rebate. Further review of the four numbers found the four customers were entitled to receive the SGP credit and AT&T Florida will provide the appropriate installation credit to these customers.

### Out of Service SGP Rebates

AT&T Florida provides an automatic SGP credit to customers for OOS repair within 24 hours from the time the report is received. In the service evaluation, staff found that 770 SGP credits were due to customers, and that AT&T Florida had provided rebates to 682 customers.

**Sunny Hills** – Of the six (6) lines where no credits were provided, five (5) were additional lines (no SGP required), and one (1) did receive an SGP credit.

1. SGP credit was given in November 2007 for [REDACTED] (see attached)
2. Additional lines and SGP credit not required ( 5 accounts)  
[REDACTED]



[REDACTED] (Line has been disconnected).

**Panama City** – Of the fifty one (51) lines where no credits were provided, sixteen (16) were additional lines, two (2) have been disconnected and we are unable to determine if an SGP credit was required, eleven (11) were initially marked as OOS “no”, however, after further investigation it was determined that they were coded incorrectly and should have been out of service “yes”. The appropriate SGP credits have been provided to these accounts. As described above, the remaining twenty two (22) lines where no credits were provided represent situations where AT&T Florida and the Commission differ on whether or not the customer was OOS. However, in each case, AT&T Florida will provide the SGP credit.

1. Additional Lines and SGP not required (16 accounts)

[REDACTED]  
[REDACTED] (Dec 07 and Jan 08)

2. Line Disconnected (2 accounts)

[REDACTED]

3. Adjustment provided-coded incorrectly ( 11 accounts)

[REDACTED]

**Panama City Beach** – All of the seven (7) lines where no credits were provided were additional lines (no SGP credit required).

**Vernon** - Of the thirteen (13) lines where no credits were provided, nine (9) were additional lines, two were initially marked as OSS “no”, however, after further investigation it was determined that they were coded incorrectly and should have been OSS “yes”. The appropriate credits have been provided to these accounts. The remaining three (2) lines where no credits were provided represent situations where AT&T Florida and the Commission differ on whether or not the customer was out of service. However, in each case, AT&T Florida will provide the service guarantee credit.

1. Adjustment provided-coded incorrectly (2 accounts)

[REDACTED]

2. Additional Lines and SGP credit not required - (9 accounts)

[REDACTED]

**Lynn Haven** – Of the eleven (11) lines where no credits were provided, six (6) were additional lines, four (4) were initially marked as OOS “no”; however, after further investigation it was determined that they were coded incorrectly and should have been OOS “yes”. The appropriate credits have been provided to these accounts, and one (1) has been disconnected and we are unable to determine if an SGP credit was required.



1. Additional Lines and SGP credit not required - (6 accounts)

[REDACTED]

2. Adjustment provided-coded incorrectly – (4 accounts)

[REDACTED]

3. Line Disconnected

[REDACTED]

Of the eighty eight (88) lines where no credits were provided, forty three (43) were additional lines and no SGP credit was required, seventeen (17) were initially marked as OOS "no"; however, after further investigation it was determined that they were coded incorrectly and should have been OOS "yes". The appropriate credits have been provided to these accounts. Three (3) of the accounts have been disconnected and we are unable to determine if an SGP credit was required, and one (1) credit was provided in the original documentation to staff (see attached).

As described above, the remaining twenty four (24) lines where no credits were provided represent situations where AT&T Florida and the Commission differ on whether or not the customer was OOS. In spite of AT&T Florida's disagreement with the staff's interpretation of the rule, AT&T Florida will provide the SGP credit for each of these.

AT&T Florida is willing to meet with you and your staff to go over our response. Should you or your staff have additional questions concerning this matter, please contact MaryRose Sirianni, Manager-Regulatory Relations, at (850) 577-5553.

Sincerely,

A handwritten signature in cursive script that reads "Greg Follensbee".

Greg Follensbee  
Executive Director

cc: Penny Buys  
Paul Vickery

Attachment



## GENERAL SUBSCRIBER SERVICE TARIFF

TELECOMMUNICATIONS, INC.  
FLORIDA

ISSUED: June 30, 2008

BY: Marshall M. Criser III, President -FL  
Miami, Florida

Sixteenth Revised Page 98  
Cancels Fifteenth Revised Page 98

EFFECTIVE: July 15, 2008

**A3. BASIC LOCAL EXCHANGE SERVICE****A3.9 Directory Assistance Service****A3.9.1 General**

- A. The Company furnishes a Directory Assistance Service for the purpose of aiding subscribers in obtaining telephone numbers.

**A3.9.2 Rates and Charges**

- A. Directory Assistance - request of a telephone number - (maximum of two requests per call.)

1. Within the Company's local calling area for the originating line

(a) Per Call<sup>1</sup>

Rate

USOC

\$1.50

NA

(1)

2. Outside the Company's local and LATA/NPA serving areas for the originating line

(b) Per Call<sup>1</sup>

1.50

NA

(1)

- B. Directory Assistance for Public Service Providers

1. All calls to Directory Assistance

(a) Per Call

.35

NA

- C. Subscribers who have applied for and received Company certification as being unable to use a telephone directory due to a visual or physical disability which can be confirmed by a physician, appropriate group, or agency are exempt from charges for Directory Assistance calls when requesting telephone numbers of lines located within the Company's local calling area for the originating line. Written confirmation must be provided to the Company for this exemption to apply. Application procedures may be obtained by calling the local business office. This exemption is applicable exclusively to calls made by the individual from their line, or in the case of a business employing disabled person(s), from the line assigned to that individual(s). Usage will be monitored by the Company and is subject to review and investigation. Certification will be verified periodically. Confirmed, inappropriate use of the exemption could result in its removal.

Note 1: Rate to be implemented during normal billing cycles beginning *August 16, 2008*.

(1)

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Fifteenth Revised Page 98  
Cancels Fourteenth Revised Page 98

ISSUED: July 17, 2007  
BY: Marshall M. Criser III, President -FL  
Miami, Florida

EFFECTIVE: August 4, 2007

**A3. BASIC LOCAL EXCHANGE SERVICE**

**A3.9 Directory Assistance Service**

**A3.9.1 General**

A. The Company furnishes a Directory Assistance Service for the purpose of aiding subscribers in obtaining telephone numbers.

**A3.9.2 Rates and Charges**

A. Directory Assistance - request of a telephone number - (maximum of two requests per call.)

1. Within the Company's local calling area for the originating line

(a) Per Call<sup>1</sup>

<b>Rate</b>	<b>USOC</b>	
\$ 1.35	NA	(DRT)

2. Outside the Company's local and LATA/NPA serving areas for the originating line

(b) Per Call<sup>1</sup>

1.35	NA	(DRT)
------	----	-------

B. Directory Assistance for Public Service Providers

1. All calls to Directory Assistance

(a) Per Call

.35	NA
-----	----

C. Subscribers who have applied for and received Company certification as being unable to use a telephone directory due to a visual or physical disability which can be confirmed by a physician, appropriate group, or agency are exempt from charges for Directory Assistance calls when requesting telephone numbers of lines located within the Company's local calling area for the originating line. Written confirmation must be provided to the Company for this exemption to apply. Application procedures may be obtained by calling the local business office. This exemption is applicable exclusively to calls made by the individual from their line, or in the case of a business employing disabled person(s), from the line assigned to that individual(s). Usage will be monitored by the Company and is subject to review and investigation. Certification will be verified periodically. Confirmed, inappropriate use of the exemption could result in its removal.

Note 1: Rate to be implemented during normal billing cycles beginning September 4, 2007.

(8)

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
FLORIDA

## GENERAL SUBSCRIBER SERVICE TARIFF

Fourteenth Revised Page 98  
Cancels Thirteenth Revised Page 98

ISSUED: July 20, 2006

EFFECTIVE: August 4, 2006

BY: Marshall M. Criser III, President -FL  
Miami, Florida

**A3. BASIC LOCAL EXCHANGE SERVICE****A3.9 Directory Assistance Service****A3.9.1 General**

- A. The Company furnishes a Directory Assistance Service for the purpose of aiding subscribers in obtaining telephone numbers.

**A3.9.2 Rates and Charges**

- A. Directory Assistance - request of a telephone number - (maximum of two requests per call.)

1. Within the Company's local calling area for the originating line

(a) Per Call

Rate	USOC
\$ 1.25	NA

(1)

2. Outside the Company's local and LATA/NPA serving areas for the originating line

(b) Per Call

1.25	NA
------	----

- B. Directory Assistance for Public Service Providers

1. All calls to Directory Assistance

(a) Per Call

.35	NA
-----	----

- C. Subscribers who have applied for and received Company certification as being unable to use a telephone directory due to a visual or physical disability which can be confirmed by a physician, appropriate group, or agency are exempt from charges for Directory Assistance calls when requesting telephone numbers of lines located within the Company's local calling area for the originating line. Written confirmation must be provided to the Company for this exemption to apply. Application procedures may be obtained by calling the local business office. This exemption is applicable exclusively to calls made by the individual from their line, or in the case of a business employing disabled person(s), from the line assigned to that individual(s). Usage will be monitored by the Company and is subject to review and investigation. Certification will be verified periodically. Continued, inappropriate use of the exemption could result in its removal.

NOV 1  
MRC UP

12 / 05 / 07

BILL DISPLAY  
PYRC

(17)

Other Charges and Credits

Changes made to your service on Nov 19, 2007

6. Credit for Service Outage Guarantee (11/19/07 - 11/19/07)

The above charges/credits are one-time charges/credits associated with  
your account or with changes made to your account during this billing cy

Total Other Charges and Credits

Government Mandated and Authorized Charges

Changes made to your service on Dec 5, 2007

Credit for taxes

- 7. Federal
- 8. FL - State
- 9. FL- County
- 10. Federal Excise Tax
- 11. FL - State Communications Tax

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MORE...

PF2=SEARCH PF3=DISPLAY PF4=PRINT PF5=PRINT W/CR PF6=FAX  
PF7=MAIN PF8=SCROLL PF9=LEFT PF10=RIGHT PF11=BACK PRINTER ID:

Attachment

	Amount
7 - 11/19/07)	-11.00
es/credits associated with	
count during this billing cycle.	-11.00
	Amount
	-.03
	-.03
	-.03
	.93
	.73

PAGE 3 OF 11

PF2=SEARCH PF3=DISPLAY PF4=PRINT PF5=PRINT W/CR PF6=FAX  
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MORE...