

ORIGINAL

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: March 31, 2005
TO: Blanca S. Bayó, Commission Clerk and Administrative Services Director
FROM: Dale R. Buys, Regulatory Analyst II, Division of Competitive Markets & Enforcement *DRB*
RE: Docket No. 050095-TL; Petition for extension and modification of existing Service Guarantee Program and for limited waiver of Rules 25-4.066(2), 25-4.070(1)(b), 25-4.070(3)(a), and 25-4.073(1)(d), F.A.C., by BellSouth Telecommunications, Inc.

Please file the attached letter from BellSouth, signed by Nancy H. Sims of BellSouth, and dated March 22, 2005, in the above referenced docket file.

DRB/
Attachment

CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
RCA _____
SCR _____
SEC 1 _____
OTH _____

DOCUMENT NUMBER DATE

03142 MAR 31 05

FPSC-COMMISSION CLERK

BellSouth Telecommunications, Inc.

Suite 400
150 South Monroe Street
Tallahassee, Florida 32301

Phone (850) 222-1201
Fax (850) 222-8640

Nancy H. Sims
Director-Regulatory Relations

March 22, 2005

Mrs. Beth Salak, Director
Division of Competitive Services & Enforcement
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Service Guarantee Plan (SGP)

Dear Mrs. Salak:

This is in response to the discussions that were held in our meeting with you on March 16th regarding BellSouth's proposed Service Guarantee Plan (SGP), and the follow-up proposed modification that was e-mailed to me by Rick Moses on March 17th.

As you are aware, we support our original petition that was filed on February 2, 2005, and believe that it is a customer oriented plan which offers direct benefit to the customer if BellSouth does not perform as promised. We also would like to emphasize that BellSouth provides excellent service and continues to do so despite unpredictable conditions and a rapidly changing environment.

With that said, you requested additional information regarding customer service complaints to BellSouth. We are providing that information as an attachment with this letter.

Also, as stated in our March 16th meeting, we will agree to modify our proposal by increasing the minimum payment on an out-of-service (OOS) customer trouble report where the twenty-four hour repair was not made to \$11 from \$10, and increasing the maximum payment of \$35 to \$40. This will give immediate compensation to the customer if service is not restored within twenty-four hours.

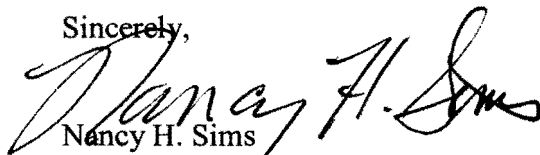
Sims/Salak
SGP, page 2

No other aspect of BellSouth's petition as filed on February 2nd is modified by this proposal. As discussed with you, it has been and is still our intent to have this proposal serve as the Service Guarantee Plan that would be in effect under the provision of the proposed new rule 25-4.085 FAC once that rule becomes effective. Therefore, we would anticipate that we would convert to this modified SGP (if approved) no sooner than the effective date of the rule. The programming to implement the new OOS minimum and maximum will be completed in August. Until such time, we will continue to operate under the existing SGP for OOS and installation as indicated in our letter filed in this docket on February 22, 2005. However, if the proposed SGP is approved, there will be no delay in moving forward with the implementation of the credits based on the answer time matrix and the National School Lunch Eligibility program for Lifeline.

If for some reason the proposed new rule does not go into effect, we would still want to implement the proposed SGP with the requested rule waivers (as petitioned) at an agreed upon date.

Should you have any questions concerning this matter, please contact me.

Sincerely,



Nancy H. Sims
Director Regulatory Relations

Attachment

Copy to: Charlie Beck
Rick Moses
Nancy White
Marshall Criser

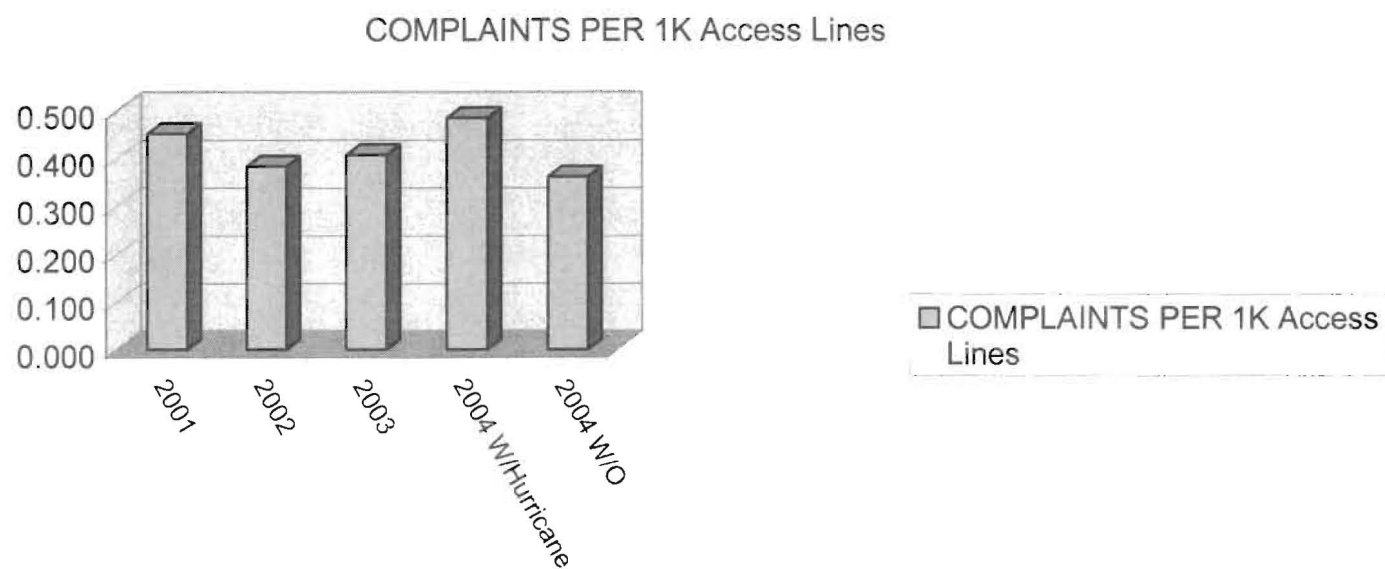
ATTACHMENT:

The attached two pages represent service complaints received by BellSouth from all sources, including FPSC complaints and warm transfers, internal executive appeals, etc.

The first page includes ADSL and Dot NET complaints.

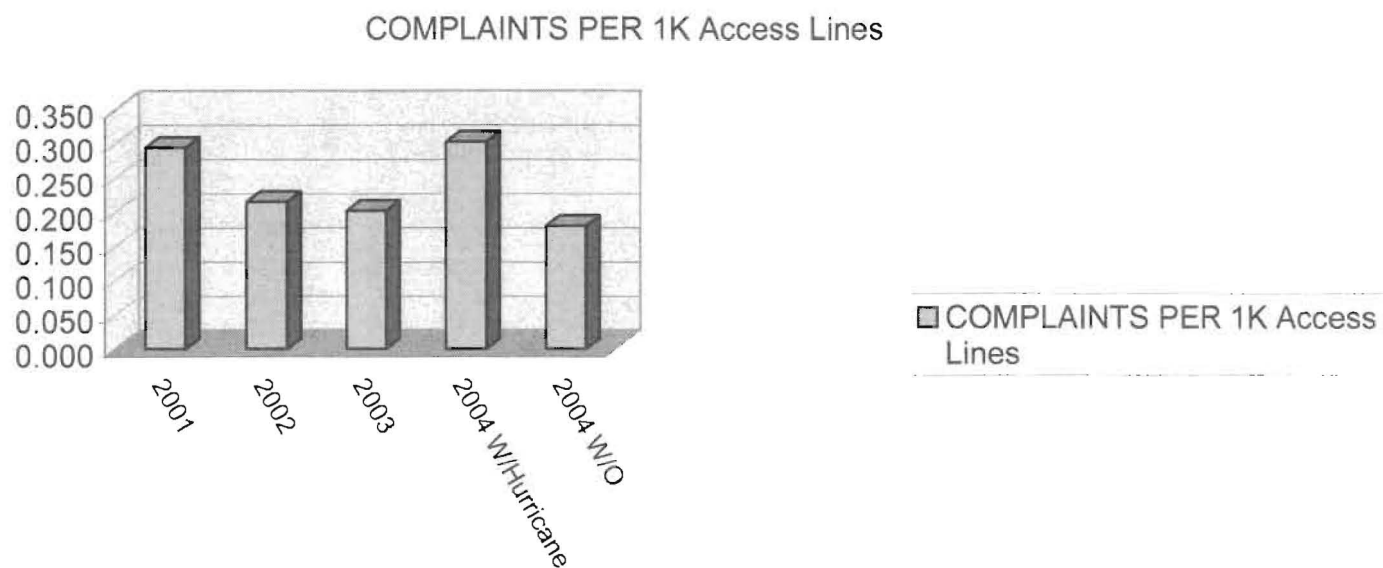
The second page excludes ADSL and Dot NET complaints.

YEAR	ACCESS LINES IN SVC	SERVICE COMPLAINTS	COMPLAINTS PER 1K Access Lines
2001	6,463,540	2922	0.452
2002	6,230,282	2389	0.383
2003	6,051,936	2469	0.408
2004 W/Hurricane	5,843,161	2833	0.485
2004 W/O	5,843,161	2116	0.362



** With ADSL and Dot NET

YEAR	ACCESS LINES IN SVC	SERVICE COMPLAINTS	COMPLAINTS PER 1K Access Lines
2001	6,463,540	1903	0.294
2002	6,230,282	1340	0.215
2003	6,051,936	1221	0.202
2004 W/Hurricane	5,843,161	1769	0.303
2004 W/O	5,843,161	1052	0.180



** w/out ADSL and DOT NET