

Harris R. Anthony  
General Counsel-Florida

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall Criser III  
Suite 400  
150 South Monroe St.  
Tallahassee, Florida 32301  
Phone (305) 530-5555

SEP 18 1992

September 18, 1992

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 Opposition to Public Counsel's Motion to Require Sworn Testimony by Southern Bell Sponsoring its Quality of Service Reports, which we ask that you file in the captioned docket.

ACK 4  
AFB 3

APR \_\_\_\_\_ A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.  
CAF \_\_\_\_\_ Copies have been served to the parties shown on the attached Certificate of Service.

CMU \_\_\_\_\_

CTR \_\_\_\_\_

EAG \_\_\_\_\_

LEG 1 w/m

LIN 6

Enclosures

CPC \_\_\_\_\_

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

SC 1

SPS \_\_\_\_\_

\_\_\_\_\_

Sincerely yours,

*Harris R. Anthony*  
Harris R. Anthony  
(2A)

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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 *18<sup>th</sup>* day of *Sept.*, 1992  
to:

Robin Norton  
Division of Communications  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0866

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Angela Green  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, Georgia 30346-2102

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
522 East Park Avenue,  
Suite 200  
Tallahassee, Florida 32301  
atty for FIXCA

Richard D. Melson  
Hopping Boyd Green & Sams  
Post Office Box 6526  
Tallahassee, Florida 32314  
atty for MCI

Joseph Gillan  
J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

Rick Wright  
Regulatory Analyst  
Division of Audit and Finance  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0865

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
306 North Monroe Street  
Post Office Box 10095  
Tallahassee, FL 32301  
atty for FCTA

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for US Sprint

Chanthina R. Bryant  
Sprint  
3065 Cumberland Circle  
Atlanta, GA 30339

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Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

Dan B. Hendrickson  
Post Office Box 1201  
Tallahassee, FL 32302  
atty for FCAN

Thomas F. Woods, Esq.  
Gatlin, Woods, Carlson and  
Cowdery  
1709-D Mahan Drive  
Tallahassee, Florida 32308  
atty for the Florida Hotel  
and Motel Association

B. H. Dickens, Jr., Esq.  
2120 L Street, N.W.  
Washington, DC 20037  
Atty for Fla. Ad Hoc

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd., #128  
Tampa, FL 33609

Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508  
Atty for AARP

Michael B. Twomey  
Assistant Attorney General  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Douglas B. Metalf  
Communications Consultants,  
Inc.  
1600 E. Amelia Street  
Orlando, FL 32803-5505

Mr. Cecil O. Simpson, Jr.  
General Attorney  
Mr. Peter Q. Nyce, Jr.  
General Attorney  
Regulatory Law Office  
Office of the Judge  
Advocate General  
Department of the Army  
901 North Stuart Street  
Arlington, VA 22203-1837

*Harris P. Anthony*  
(28)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of ) Docket No. 920260-TL  
the Revenue Requirements and Rate )  
Stabilization Plan of Southern ) Filed: Sept. 18, 1992  
Bell Telephone and Telegraph )  
Company )  
\_\_\_\_\_ )

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
OPPOSITION TO PUBLIC COUNSEL'S MOTION TO REQUIRE  
SWORN TESTIMONY BY SOUTHERN BELL SPONSORING  
ITS QUALITY OF SERVICE REPORTS**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or the "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, and herewith files this response in Opposition to the Office of Public Counsel's ("Public Counsel") Motion to Require Sworn Testimony by Southern Bell Sponsoring its Quality of Service Reports (the "Motion"). In support of its opposition to the Motion, Southern Bell shows the Florida Public Service Commission (the "Commission") the following:

1. On September 11, 1992, Public Counsel served the Motion on Southern Bell. Public Counsel therein asserts the need for testimony at the hearings in this docket regarding Schedule 11 of form PSC/CMU 28 because, he says, the quality of service provided by Southern Bell is of particular importance in light of the Company's incentive regulation plan that was approved by the Commission in Order No. 20162. Accordingly, Public Counsel is seeking to have this Commission require Southern Bell to sponsor a witness regarding the quarterly Schedule 11 reports filed by Southern Bell with the Commission. As described below, the filing of such testimony would be superfluous and is unnecessary.

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2. Southern Bell does not dispute that the quality of service that any regulated utility provides to its customers is of concern to this Commission. This proposition is equally true for Southern Bell, which committed in 1988 to continue to provide high quality service to its customers. Indeed, the Company's ongoing efforts in this regard have been reflected by the service that Southern Bell has been able to provide throughout South Florida in the aftermath of Hurricane Andrew. The vast majority of Southern Bell's customers have remained in service throughout this time because of the Company's high-quality network infrastructure. In addition, the Company's exemplary commitment to service has been shown by the extraordinary efforts of its employees to restore service to those customers who, for one reason or another, have had their service interrupted since the storm.

3. As described in the prefiled testimony filed by the Company in this docket, the emphasis that the Company places upon quality of service is as great today as it has ever been. Southern Bell recognizes that as the telecommunication industry becomes increasingly competitive, the level of service that the Company provides to its customers is of paramount importance.

4. Mr. Joseph P. Lacher is Southern Bell's President-Florida and, as such, is responsible for Southern Bell's operations within the state. At pages 15 through 18 of his prefiled testimony in this docket, he discusses the emphasis that the Company places upon the level of service provided to its

customers. Thus, he can be examined on quality of service issues on a general, global level. Similarly, Mr. A. M. Lombardo, Southern Bell's Assistant Vice President for Regulatory Relations in Florida, discusses quality of service issues at pages 23 through 25 of his prefiled testimony. He too can discuss these issues on a high level basis.

5. In addition, Public Counsel, on August 4, 1992, subpoenaed Jerry Sanders, Southern Bell's Vice President-Network for Florida, to appear on January 25, 1993, at the hearings scheduled for this matter. If Public Counsel wishes to inquire appropriately of Mr. Sanders about quality issues from the perspective of Southern Bell's Network Department, he may do so at that time.

6. To the extent that Public Counsel contends that the individuals enumerated above are unable to discuss in sufficient detail the information provided on the Schedule 11 reports filed by Southern Bell, he can obtain the specific information he seeks through the use of appropriate discovery. He can file interrogatories, requests for production of documents or take the depositions of people who are familiar with whatever specific aspects of these reports Public Counsel is interested in.


7. In light of the above, Public Counsel has more than sufficient means to make inquiry and present evidence regarding quality of service issues, including any related to the Schedule 11 reports filed by Southern Bell. There is absolutely no need to require Southern Bell to produce yet another witness over and


above the nine witnesses it has already submitted in this matter. To add another witness as suggested by Public Counsel will merely further unnecessarily complicate an already extremely complex matter.

8. Since Public Counsel can otherwise obtain all the evidence that it may need regarding the issues that a witness on quality of service would provide, Southern Bell respectfully requests that Public Counsel's Motion to Require Sworn Testimony by Southern Bell Sponsoring its Quality of Service Reports be denied.

Respectfully submitted this 18th day of September, 1992.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY (24)  
J. PHILLIP CARVER  
c/o Marshall M. Criser  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301  
(305) 530-5555

  
R. DOUGLAS LACKEY (28)  
NANCY B. WHITE  
4300 Southern Bell Center  
675 W. Peachtree St., N.E.  
Atlanta, GA 30375  
(404) 529-3862