

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SOUTHERN BELL TELEPHONE COMPANY

DOCKET NO. 920260-TL

TESTIMONY OF
NANCY PRUITT
NOVEMBER, 1993

DOCUMENT NUMBER-DATE

12573 NOV 22 83

FPSC-RECORDS/REPORTING

1 | Q. State your name and address.

2 | A. Nancy Pruitt, 101 E. Gaines Street, Tallahassee, Florida 32399.

3 | Q. Where are you employed?

4 | A. I am employed by the Florida Public Service Commission as a Senior
5 | Consumer Affairs Analyst for the Division of Consumer Affairs.

6 | Q. Give a brief description of your background and experience.

7 | A. In 1972 I received a Bachelor of Arts Degree in government from
8 | Florida State University. I began employment with the Florida Public
9 | Service Commission in January 1990.

10 | Q. Briefly describe your position and duties.

11 | A. As a Senior Consumer Affairs Analyst, I receive and investigate
12 | complaints against regulated utilities. I work with utility
13 | companies and their customers to achieve resolution of complaints. I
14 | provide explanation and counseling on various matters related to
15 | utility company rates and service and compliance with PSC rules and
16 | utility company tariffs. I review complaint data to track problem
17 | areas and trends.

18 | Q. Describe the nature of your testimony.

19 | A. My testimony will set forth the complaint activity in the Consumer
20 | Affairs Division involving Southern Bell Telephone and Telegraph
21 | Company (Southern Bell). Exhibits will show the number and types of
22 | complaints received, the justification for the customer having
23 | contacted the commission, and the complaint activity of Southern Bell
24 | compared with other local exchange telephone companies (LECs).

25 | Q. What time period will your testimony encompass?

- 1 A. My testimony will focus on the complaint activity of calendar years
2 1988 - 1992 and the first ten months of 1993.
- 3 Q. Describe any preliminary screening that may take place before a
4 complaint is logged to be investigated.
- 5 A. A complaint is not logged unless the analyst receiving the contact
6 determines that the matter appears to be within the jurisdiction of
7 the commission and that there is reason to believe that the complaint
8 may be justified. If it appears there is nothing the commission can
9 do to help, or the complaint is clearly not justified, the customer
10 is so advised.
- 11 Q. What procedure is followed when a complaint is logged?
- 12 A. Information is entered on a consumer request form and the company is
13 requested to review the complaint and respond. When the response is
14 received, both the complaint and the response are reviewed by
15 Consumer Affairs personnel to determine compliance with commission
16 rules and company tariffs and to determine what other action, if any,
17 needs to be taken. Before a complaint is closed, the analyst
18 handling the case customarily contacts the customer to verify
19 satisfaction or discuss the action taken and the applicable rules and
20 tariffs.
- 21 Q. How many complaints were logged against Southern Bell during 1992?
- 22 A. Records show that 1,624 complaints were logged against Southern Bell
23 during 1992.
- 24 Q. How do these figures compare with complaint activity for 1991?
- 25 A. Complaints were down 25% from 1991. There were 1,624 complaints

1 | logged against the company during 1992 compared to 2,160 during 1991.

2 | Q. How many complaints were logged against Southern Bell during the

3 | first ten months of 1993?

4 | A. One thousand four hundred ten (1,410) complaints were logged against

5 | Southern Bell from January 1 through October 31, 1993.

6 | Q. How do these figures compare with complaint activity for the first

7 | ten months of 1992?

8 | A. Complaints were up 7 %. There were 1,410 complaints logged against

9 | the company in the first ten months of 1993 compared to 1,322 during

10 | the same period in 1992.

11 | Q. How does complaint activity compare with complaint activity figures

12 | for preceding calendar years?

13 | A. This comparison is shown in NP-1. NP-1 is a graph of Southern Bell's

14 | complaint activity for the past 10 years and shows a significant

15 | decline in complaints against Southern Bell from 1983 to 1987, then a

16 | smaller, gradual increase in complaints from 1987 to 1991, and a drop

17 | in complaints in 1992.

18 | Q. What types of complaints were received against Southern Bell during

19 | 1992?

20 | A. During 1992, Consumer Affairs received 418 complaints about billing

21 | and 1,206 about service-related matters.

22 | Q. Are complaints classified more specifically?

23 | A. Yes. After an analyst takes a complaint and determines whether the

24 | complaint is related to a service or billing problem, the analyst

25 | chooses a more specific classification category to further identify

1 the complaint.

2 Q. What were the major types of complaints received against Southern
3 Bell in 1992?

4 A. The top six complaint types for Southern Bell during 1992 were
5 service outages (222), followed by complaints about delayed new
6 connections (188), continuous service problems (181), improper
7 disconnections (131), business office problems (87) and repair delays
8 (65). NP-2 is a chart illustrating the major types of complaints
9 received against Southern Bell in 1992.

10 Q. What types of complaints were received against Southern Bell during
11 the first ten months of 1993?

12 A. Consumer Affairs received 314 complaints about billing and 1,096
13 about service-related matters.

14 Q. What were the major types of complaints received against Southern
15 Bell in the first ten months of 1993?

16 A. The top six complaint types for Southern Bell during the first ten
17 months of 1993 were service outages (277), delayed new connections
18 (145), continuing service problems (138), improper disconnections
19 (86), business office problems (84) and delayed repairs (67).

20 Q. Do Consumer Affairs' records show what part of Southern Bell's
21 service area had the most complaints?

22 A. During 1992, customers in Dade County logged 612 complaints (38%)
23 followed by Broward with 274 complaints (17%), Palm Beach with 145
24 complaints (9%), Duval with 97 complaints (6%), Brevard with 79
25 complaints (5%), Volusia with 76 complaints (5%), and Orange with 74

1 | complaints (5%).

2 | During the first ten months of 1993 customers in Dade County
3 | logged 573 complaints (41%), followed by Broward with 232 complaints
4 | (16%), Palm Beach with 176 complaints (12%), Orange with 68
5 | complaints (5%), and Duval and Volusia with 50 each (4%).

6 | Q. Have you compared the complaint activity of Southern Bell with that
7 | logged against other companies?

8 | A. Yes. NP-3 and NP-4 compare the five major local exchange companies
9 | for the calendar years of 1988-1992. NP-3 includes the number and
10 | types of complaints logged and the percentage of increase or decrease
11 | from the previous year. NP-4 includes a breakdown of the
12 | justification, the number of complaints and justified complaints per
13 | total access lines for the five major LECs, the percentage of total
14 | complaints filed against each, and industry totals.

15 | NP-5 compares the five major local exchange companies for the
16 | first ten months of 1993. The exhibit includes the number of
17 | complaints logged, the percentage of increase or decrease from the
18 | previous year, the number of complaints per 1000 customers, and the
19 | percentage of total LEC complaints.

20 | Q. How does Southern Bell compare with the other LECs for the number and
21 | types of complaints received?

22 | A. For the time period of 1988-1991 the most common types of complaints
23 | received against Southern Bell and LECs as a group concerned delayed
24 | new service connections, followed by continuous service problems,
25 | service outages and improper disconnections.

1 As shown in NP-3, complaints against Southern Bell have
2 increased each year since 1988 except in 1990 when complaint activity
3 for the company decreased 1% from the previous year, and in 1992 when
4 complaint activity decreased 25%.

5 On a year by year basis Southern Bell has had a larger increase
6 in the percentage of complaints for each year than the industry
7 average, except for 1991 when the total number of complaints against
8 LECs increased by 16% from the previous year and Southern Bell's
9 complaints increased by 13%, and in 1992 when the total number of
10 complaints against LECs decreased by 18% from the previous year and
11 Southern Bell's complaints decreased by 25%. However, during the
12 first ten months of 1993 Southern Bell complaints have increased 7%
13 while the total number of complaints against LECs as a whole has
14 increased less than 1%.

15 Since 1988 Southern Bell's complaints have decreased 8% while
16 the average complaint activity against the LECs as a whole has
17 decreased 9%. The number of Southern Bell complaints per 1000 access
18 lines has decreased since 1988 from .462 per 1000 to .356 per 1000 in
19 1992 while the industry average has decreased from .432 to .330.

20 Q. How is justification for a complaint determined?

21 A. When the complaint analyst reviews the company's report and closes
22 the complaint, the analyst determines whether the complaint was
23 justified, not justified, or had some justification. The
24 determination is noted on the complaint file. In each case,
25 determination is based on commission rules, company tariffs, and/or

1 common sense guidelines. Every effort is made to be as objective as
2 possible.

3 Q. What was the closing determination for the Southern Bell complaints
4 closed during the time period analyzed?

5 A. Exhibit NP-4 shows the closing determination for complaints filed
6 against the five major LECs and the totals for all LECs. Since 1989
7 Southern Bell has had a slightly higher percentage of justified
8 complaints each year than LECs as a group except in 1992 Southern
9 Bell's percentage of justified complaints was 36% compared to 37% for
10 the industry average.

11 The number of justified Southern Bell complaints per 1000
12 access lines has been higher than LECs as a group from 1988 through
13 1992. In 1992 Southern Bell's justified complaints per 1000 access
14 lines were .128 compared to .121 for the industry.

15 Q. How does Southern Bell compare to other LECs in the number of
16 complaints filed per access lines and the percentage of access lines
17 each company provides in Florida?

18 A. NP-4 shows that when comparing the percentage of complaints received
19 by each company to that company's percentage of Florida's total
20 access lines, Southern Bell received a larger percentage of the
21 state's total complaints than its percentage of access lines in the
22 state for each year since 1988. For example, in 1991 Southern Bell
23 had approximately 58% of the total access lines in Florida but 69% of
24 the total number of complaints, and in 1992 Southern Bell had 58% of
25 the total access lines but 63% of the total number of complaints.

1 Q. Are there any major areas which Southern Bell should review for
2 compliance with the rules of the commission?

3 A. Yes. Southern Bell should review its activities for compliance with
4 rule 25-4.113 F.A.C. relating to refusal or discontinuance of
5 service. Special attention should be given to section (4) which
6 outlines insufficient cause for refusing service to a customer or
7 applicant.

8 In 1991, 35 complaints were logged against Southern Bell for
9 refusal of service. This represented 55% of the refusal of service
10 complaints for the industry. Southern Bell had refused service for
11 non-payment of previous occupants' bills, for outstanding charges in
12 another state and for outstanding charges of an ex-spouse. In 1992,
13 34 complaints were logged against Southern Bell for refusal of
14 service. This represented 57% of the refusal of service complaints
15 for the industry. As in the previous year, Southern Bell had refused
16 service for non-payment of previous occupants' bills and for
17 outstanding charges in another state. During the first ten months of
18 1993 22 complaints were logged against Southern Bell for refusal of
19 service. This represented 54% of the refusal of service complaints
20 for the industry. As in the previous two years Southern Bell had
21 refused service for non-payment of previous occupants' bills.

22 In 1991 one hundred seventy-five (175) complaints were received
23 in which customers complained that service was improperly
24 disconnected for non-payment of a bill of a previous tenant, non-
25 payment of yellow page advertising, or not properly posting payments

1 | to customer accounts.

2 | Clerical errors in service orders also caused improper
3 | disconnections. Service was also improperly disconnected without
4 | notice for non-payment of the initial deposit. Customers also
5 | complained that they were not notified of a delay in processing
6 | payments made at a pay agency, which caused their service to be
7 | disconnected for nonpayment. The 175 complaints represented 66% of
8 | the complaints concerning the improper disconnection of service for
9 | the industry as a whole. Forty-six (46) percent of Southern Bell's
10 | refusal of service complaints and 40% of the improper disconnection
11 | of service complaints were found to be justified in 1991.

12 | In 1992, 131 complaints were received concerning the improper
13 | disconnection of service by Southern Bell. This represented 58% of
14 | the complaints in this category for the industry. As in the previous
15 | year yellow-page advertising, previous tenant bills, improper posting
16 | of payments, lack of notice for initial deposits, pay agency
17 | processing delays, and clerical errors in service orders were
18 | involved. Twenty-nine (29) percent of Southern Bell's refusal of
19 | service and improper disconnection of service complaints were found
20 | to be justified in 1992.

21 | In the first ten months of 1993, 86 complaints were received
22 | concerning the improper disconnection of service by Southern Bell.
23 | This represents 65% of the total complaints in this category for the
24 | industry as a whole. Complaints continued to be received concerning
25 | delays in posting payments at pay agencies, previous tenant bills and

1 | clerical errors. Thirty-six (36) percent of the refusal of service
2 | complaints and 21% of the improper disconnect complaints were found
3 | to be justified.

4 | The major complaint category for Southern Bell in 1991
5 | concerned delays in new service connections. Four hundred twenty-
6 | seven (427) complaints were logged with 52% found justified. Service
7 | was not timely provided due to lack of facilities, defective
8 | facilities, heavy workload, severe weather, and orders processed
9 | without scheduling necessary field visits. Customers were often not
10 | kept informed of the delays. This had been the major complaint
11 | category for Southern Bell since 1988.

12 | In 1992, complaints concerning new service connections declined
13 | to 188 and service outages became the major complaint category with
14 | 222 complaints. One hundred thirty-three (133) delays in new
15 | service connection complaints were logged against Southern Bell prior
16 | to Hurricane Andrew with 61 from Dade County customers. After the
17 | hurricane 55 complaints were logged against Southern Bell with 27
18 | from Dade County. The 188 delays in new service connection
19 | complaints represented 79% of the complaints in this category for the
20 | industry.

21 | Of the 222 service outage complaints in 1992, one hundred ten
22 | (110) were logged prior to Hurricane Andrew with 58 (53%) from Dade
23 | County. After the hurricane 67 complaints (60%) were logged from
24 | Dade County. The 222 service outage complaints represents 78% of the
25 | complaints in this category logged against the industry.

1 In the first ten months of 1993, the major complaint category
2 was again service outages with 277 complaints which exceeds the
3 number of service outage complaints for all of 1992. This represents
4 85% of the service outage complaints for the industry. Seventy-one
5 (71) percent were found to be justified. One hundred thirty-four
6 (134) complaints (59%) were from Dade County. Most of the Dade County
7 complaints concerned delay in repair time by Southern Bell as
8 customers were given initial service restoration times in excess of
9 24 hours, with some estimates of up to 17 days.

10 The second major category for the first ten months of 1993 was
11 delayed new service connection. One hundred forty-five (145)
12 complaints were logged and 57% were found justified.

13 Q. Can you identify through complaint activity any other areas in which
14 it appears Southern Bell should improve?

15 A. Yes. The second largest category of complaints logged against
16 Southern Bell in 1991 concerned continuing service problems. Two
17 hundred twenty-three (223) complaints were received concerning
18 continuing service problems and 44% of these complaints were found to
19 be justified. In many cases Southern Bell failed to isolate the
20 trouble correctly when the customer first reported a problem with
21 service. In one case, a customer made nine reports of cross-talk to
22 the company over an eight month period. Field technicians were
23 dispatched to isolate and correct the trouble condition. Various
24 problems were corrected and the report closed each time. Finally a
25 problem was identified in the central office equipment and the

1 trouble was cleared.

2 Customers also complained of delayed repairs and service not
3 being timely restored after an outage. Company reports indicate in
4 some cases the company failed to isolate the trouble correctly,
5 trouble reports were closed in error when the service was not
6 restored, and technicians were not timely dispatched due to heavy
7 workload.

8 One hundred eighty-one (181) complaints were received
9 concerning continuing service problems in 1992. This was the third
10 major category of complaints and represented 72% of the total number
11 of complaints in this category against the industry in 1992. Forty
12 (40) percent of the complaints logged to Southern Bell were found to
13 be justified.

14 In the first ten months 1993 continuing service problems was
15 also the third major category of complaints logged against Southern
16 Bell with 138 complaints which represented 68% of the total number of
17 complaints in this category logged against the industry. Forty-six
18 (46) percent were found to be justified.

19 Q. Does this conclude your testimony?

20 A. Yes.

21

22

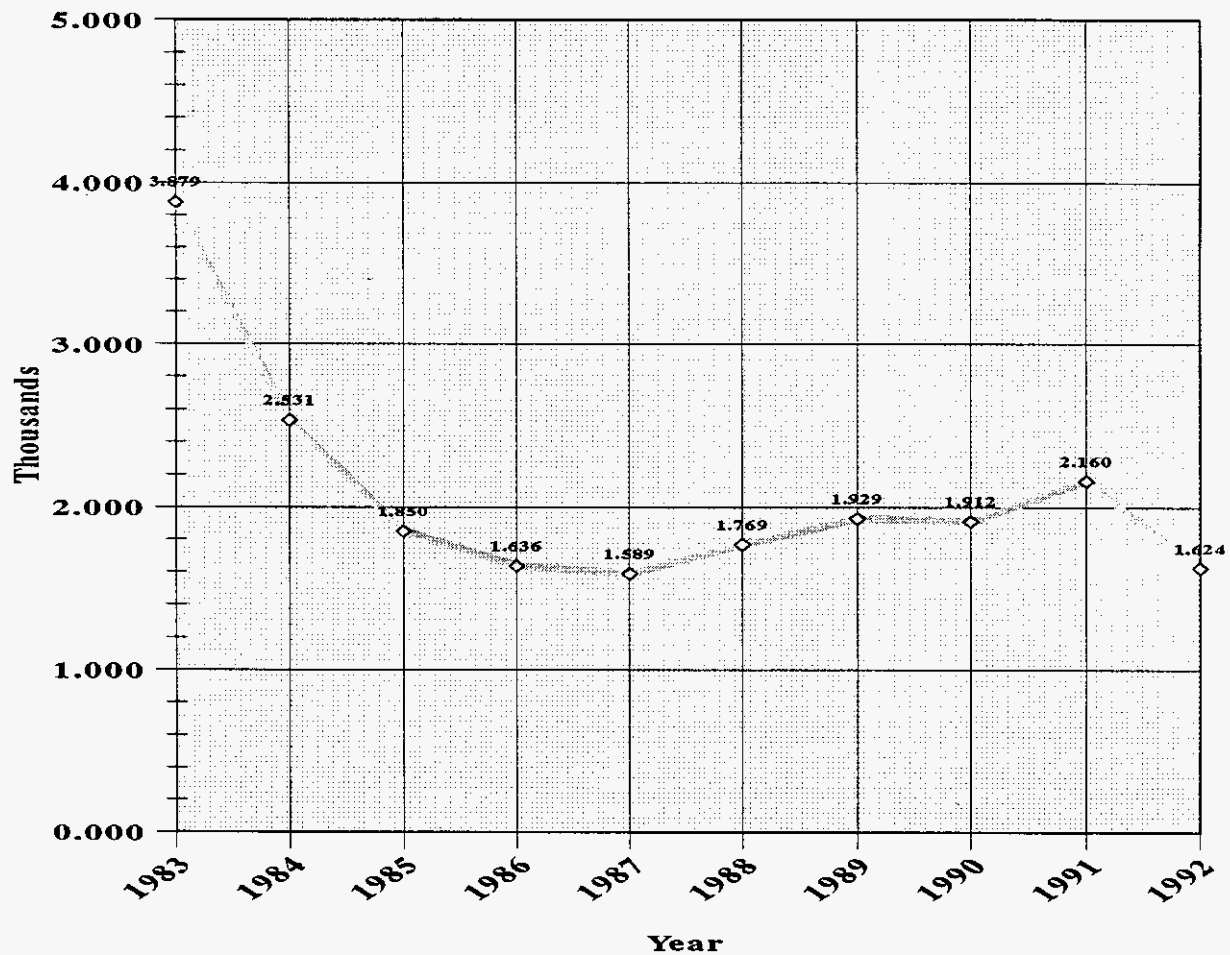
23

24

25

SOUTHERN BELL LOGGED COMPLAINTS

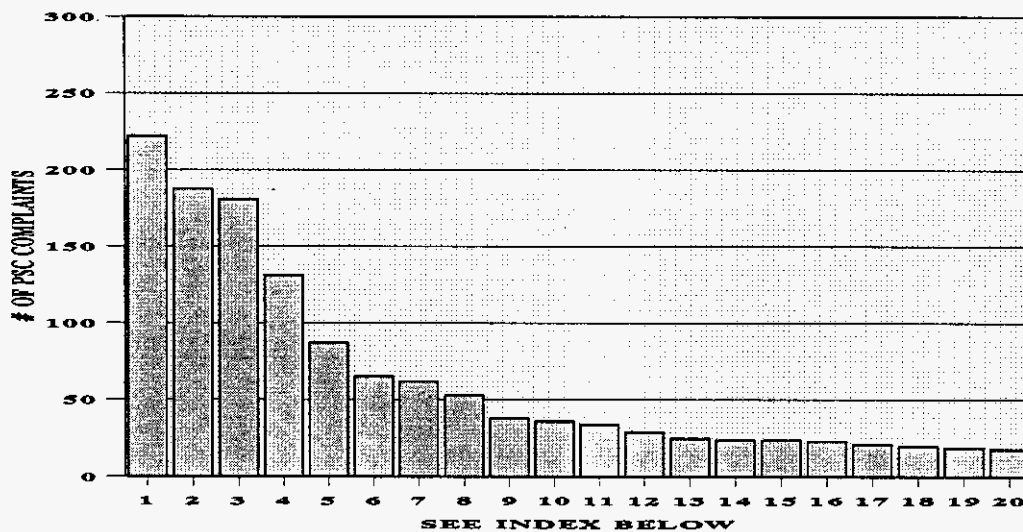
10 Year Comparison



DOCUMENT NUMBER-DATE
12573 NOV 22 88
PSC-RECORDS/REPORTING

SOUTHERN BELL TELEPHONE COMPANY

Complaints by Type - 1992



- | | |
|---|---|
| 1. Service Outage (222) | 12. Incomplete Outside Work (29) |
| 2. Delay Connect - New Location (188) | 13. Billing Wrong Customer (25) |
| 3. Continuous Service Problems (181) | 14. Payment Not Credit (24) |
| 4. Improper Disconnect (131) | 15. Local Service Billing (24) |
| 5. Business Office Problem (87) | 16. Customer Calling Features (23) |
| 6. Delay Repair - Not Outage (65) | 17. Trouble Location Charge (21) |
| 7. Custom Calling Features - Billing (62) | 18. Denied Calls (20) |
| 8. Miscellaneous Service (53) | 19. Harassing Calls (19) |
| 9. Delay in Refund or Credit (38) | 20. Delay Connect - Addition/Same Location (18) |
| 10. Miscellaneous Billing (36) | 21. Other Types (324) |
| 11. Service Refused (34) | |

CALENDAR YEAR 1992

	Service	Billing	1992 Total Received	% Change From 1991	Major Type
ALLTEL Florida, Inc.	34	23	57	-10%	Delay Connect
Centel	90	34	124	-4%	Business Office Problem
GTE Florida	354	151	505	-1%	Service Outages
Southern Bell	1206	418	1624	-25%	Service Outages
United Telephone	155	88	243	-1%	Improper Disconnect
Total*	1851	727	2578	-18%	Service Outage

*Includes All LECs

CALENDAR YEAR 1991

	Service	Billing	1992 Total Received	% Change From 1990	Major Type
ALLTEL Florida, Inc.	38	25	63	43%	Service Problem
Centel	85	44	129	3%	Business Office Problem
GTE Florida	317	194	511	41%	Service Problem
Southern Bell	1616	544	2160	13%	Delay Connect
United Telephone	165	81	246	8%	Improper Disconnect
Total*	2237	899	3136	16%	Delay Connect

*Includes All LECs

CALENDAR YEAR 1990

	Service	Billing	1990 Total Received	% Change From 1989	Major Type
ALLTEL Florida, Inc.	35	9	44	-17%	Service Problem
Centel	77	48	125	-11%	Service Problem
GTE Florida	236	126	362	-16%	Service Problem
Southern Bell	1529	383	1912	-1%	Delay Connect
United Telephone	166	61	227	-10%	Improper Disconnect
Total*	2070	633	2703	-5%	Delay Connect

*Includes All LECs

CALENDAR YEAR 1989

	Service	Billing	1989 Total Received	% Change From 1988	Major Type
ALLTEL Florida, Inc.	44	9	53	-9%	Service Problem
Centel	99	41	140	-19%	Service Problem
GTE Florida	302	131	433	-19%	Service Problem
Southern Bell	1475	454	1929	9%	Delay Connect
United Telephone	169	82	251	2%	Service Problem
Total*	2117	726	2843	1%	Delay Connect

*Includes All LECs

CALENDAR YEAR 1988

	Service	Billing	1988 Total Received	% Change From 1987	Major Type
ALLTEL Florida, Inc.	45	13	58	-23%	Service Problem
Centel	123	49	172	-29%	Delay Connect
GTE Florida	399	137	536	-26%	Service Problem
Southern Bell	1318	451	1769	11%	Delay Connect
United Telephone	158	88	246	-4%	Delay Connect
Total*	2069	750	2819	-4%	Delay Connect

*Includes All LECs

CALENDAR YEAR 1992

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Line	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	32	14	14	53%	1.044	.586	1%	2%
Centel	43	65	18	34%	.433	.150	4%	5%
GTE Florida	222	184	100	44%	.292	.128	22%	20%
Southern Bell	586	663	379	36%	.356	.128	59%	63%
United Telephone	53	143	50	22%	.219	.048	14%	9%
Total*	947	1080	564	37%	.330	.121		

*Includes all LECs

CALENDAR YEAR 1991

	Justification for Complaints Closed				Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Line	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	32	19	12	51%	1.196	.607	1%	2%
Centel	58	44	28	45%	.472	.212	4%	4%
GTE Florida	201	210	111	39%	.304	.120	22%	16%
Southern Bell	922	763	493	42%	.492	.210	58%	69%
United Telephone	72	140	49	28%	.230	.067	14%	8%
Total*	1296	1186	698	41%	.416	.172		

*Includes all LECs

CALENDAR YEAR 1990

	Justification for Complaints Closed				Complaints Per	Justified Per	% State Total Access Line	% LEC Total Complaints
	Yes	No	Some	% Justified	1000 Access Lines	1000 Access Lines		
ALLTEL	22	11	12	49%	.876	.438	1%	2%
Centel	64	47	27	46%	.476	.244	4%	5%
GTE Florida	121	177	75	32%	.222	.074	23%	13%
Southern Bell	719	679	513	38%	.450	.169	59%	71%
United Telephone	61	96	65	27%	.226	.055	14%	8%
Total*	993	1031	698	36%	.373	.136		

*Includes all LECs

CALENDAR YEAR 1989

	Justification for Complaints Closed				Complaints Per	Justified Per	% State Total Access Line	% LEC Total Complaints
	Yes	No	Some	% Justified	1000 Access Lines	1000 Access Lines		
ALLTEL	22	16	12	44%	1.114	.463	1%	2%
Centel	59	41	30	45%	.577	.243	4%	5%
GTE Florida	146	169	114	34%	.276	.093	23%	15%
Southern Bell	721	664	542	37%	.479	.179	59%	68%
United Telephone	67	118	89	24%	.269	.072	14%	9%
Total*	1028	1023	798	36%	.414	.150		

*Includes all LECs

CALENDAR YEAR 1988

	Justification for		Complaints Closed		Complaints Per 1000 Access Lines	Justified Per 1000 Access Lines	% State Total Access Line	% LEC Total Complaints
	Yes	No	Some	% Justified				
ALLTEL	26	16	17	44%	1.281	.618	1%	2%
Centel	82	44	44	48%	.773	.373	3%	6%
GTE Florida	211	196	133	39%	.353	.141	23%	19%
Southern Bell	688	577	477	39%	.462	.180	59%	63%
United Telephone	59	93	79	26%	.285	.069	13%	9%
Total*	1076	946	757	39%	.432	.166		

*Includes all LECs

1993 Complaints
 January through October

	Total Received	Percent Change From 1992	Complaints Per 1000 Customers	% State Total Access Lines	% Total LEC Complaints
ALLTEL	14	-75%	.241	1%	1%
Centel	82	-21%	.271	4%	4%
GTE Florida	442	5%	.247	22%	21%
Southern Bell	1410	7%	.303	58%	66%
United	170	-18%	.146	14%	8%
Total *	2140	0	.267		

*Includes all LECs