

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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1996

Application for certificate)
to provide interexchange)
telecommunications service)
by NYNEX Long Distance Company))

Docket No. 960697-TL

Filed: July 17, 1996

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MOTION FOR AUTHORITY
TO PROVIDE EXPERIMENTAL SERVICE

NYNEX Long Distance Company (NYNEX), Applicant herein, hereby moves the Commission pursuant to Rule 25-22.037, Florida Administrative Code, for authority to begin experimental service testing. In support, NYNEX shows:

1. On June 3, 1996, NYNEX filed its application in this docket for authority to provide interexchange telecommunications service in Florida. According to Commission staff, this application should be heard by the Commission at its July 30, 1996 agenda conference. If granted, NYNEX's IXC certificate should become effective in early September, at which time the company plans to begin offering interexchange service within the state of Florida.

2. As shown in its application, NYNEX is a second generation wholly owned subsidiary of NYNEX Corporation, whose principal operating subsidiaries provide local exchange telecommunications in

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the New York and New England areas.¹ Florida will be one of NYNEX Corporation's first ventures into out-of-region interexchange service. In order to assure itself that its network and internal operations are operationally ready to provide the highest quality service prior to initiation of service to the public in early September, NYNEX wishes to conduct a network trial, of limited duration and on an experimental basis, as set forth below.

3. The Commission has authority to approve provision of such service under Section 364.057 (3), Florida Statutes (1995), which provides as follows:

After July 1, 1995, the commission may authorize experimental services, limited to two-way, intrastate, residential communications services, for the purposes of testing marketing strategies or technical feasibility, and the commission shall place reasonable restrictions on the time and geographic area in which such experimental services are provided, except that no such authorized experiment shall extend beyond December 31, 1995, unless the entity has applied for a certificate pursuant to the provisions of this chapter.

As noted above, NYNEX has applied for a certificate to offer interexchange service and thus the Commission may authorize the experiment at the present time.

4. Authorization to provide limited service on an experimental basis as described below will allow NYNEX the opportunity to identify and correct possible problems in its

¹ New York Telephone Company provides service within six LATAs in Connecticut and New York State, including the New York City Metropolitan area. New England Telephone Company provides service in six LATAs in Massachusetts, Maine, New Hampshire, Vermont and Rhode Island.

marketing, operational and provisioning functions and reduce or eliminate complaints that often accompany initiation of service. Functional areas in which NYNEX anticipates testing marketing strategies or technical feasibility include the following:

a. Customer presentation and order implementation, including service validation/needs assessment, processing letters of agency, communicating and tracking service delivery;

b. Provisioning service, including Carrier Identification Code testing, Primary Interexchange Carrier code verification, processing of inbound and outbound customer account record exchange, testing service order processing feeds and configuration management (access, routing and facilities management);

c. Call handling and traffic capabilities, including service activation based on first call, operator service and testing early warning fraud detection and toll abuse procedures;

d. Customer service, including trouble reporting and management, customer inquiries and network monitoring; and

e. Bill processing, including collecting switched data, rating, disconnecting, taxing, billing reconciliation, presentation and distribution.

5. Specifically, NYNEX proposes as follows: The company would conduct the experiment using NYNEX employees, retirees and their families living in Florida who agree to participate in the trial. The company anticipates that an adequate trial can be conducted with approximately 20 - 30 subjects throughout the state. Those subjects who agree to participate will be treated as new

customers, whose service orders will be processed according to NYNEX's service provisioning procedures. Participants will place their usual long distance calls over the NYNEX network, thus allowing NYNEX to test its network, rating and billing functions, beginning in early August. The company anticipates that the experiment will last approximately four to six weeks, such that each subject will participate for at least one billing cycle.

Upon conclusion of the experiment NYNEX will individually poll participants to determine whether they wish to have their service switched to their former long distance carrier (or any other carrier). If so, NYNEX promptly will switch the participant to the selected carrier, and will absorb all PIC change costs.

6. The purpose of the experiment is to test the technical feasibility of NYNEX systems, and thus the company does not propose to derive financial benefit from the experiment. Additionally, NYNEX recognizes that participation in the experiment will inconvenience its retirees and their families by requiring them to change interexchange carriers twice within a relatively short period of time as well as respond to polling and customer surveys. Therefore, the company proposes to compensate each participant with a credit of up to \$300 toward long distance charges, which may only be used on the NYNEX long distance platform during the course of the experiment.²

² Because participation is limited to NYNEX employees, retirees and their families, the Commission may, if necessary, authorize this one-time credit as an employee concession.

7. In order to ensure that participants do not inadvertently exceed this credit, the company will contact each participant whose usage level reaches \$200. At that time, the participant will be given the opportunity to switch to any certificated long distance carrier, at no charge, or to continue participation in the experiment until the \$300 credit level is reached. If the participant elects to continue, NYNEX will work with the participant to ensure an orderly transfer of the customer's long distance service when the \$300 credit level is reached.

8. NYNEX anticipates that authorization of its network trial will greatly reduce the possibility of service problems that could otherwise give rise to complaints. Granting this motion is not only consistent with the Commission's authority under section 364.057, Florida Statutes (1995), but is also consistent with the Commission's obligation under section 364.01(4)(b), Florida Statutes (1995), to encourage competition through flexible regulatory treatment.

THEREFORE, for the reasons stated above, NYNEX Long Distance Company requests that the Commission consider this motion on an expedited basis, and upon consideration, grant the motion and authorize NYNEX to initiate limited experimental service, as described herein.

Respectfully submitted this 17th day of July, 1996.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Motion for Authority to Provide Experimental Service has been served by hand delivery this 17th day of July 1996, on the following:

Scott Edmonds
Division of Legal Services
Florida Public Service Commission
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Marsha E. Rule