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November 24, 1997

VIA HAND DELIVERY

Honorable Blanca S. Bayo
Director - Records and Reporting
Florida Public Service Commission
Room 110
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket Number 970882-TI

Dear Ms. Bayo:

Enclosed are the original and 15 copies of the Direct Testimony of Sandee Buysse-Baker on Behalf of Sprint Communications Company Limited Partnership being filed with regard to the referenced docket. Also enclosed is a copy to be file-stamped and returned to me.

Sincerely,


C. Everett Boyd, Jr.

- ACK _____
- AFA _____
- APP 1 _____
- CAF 2 _____
- CEB _____
- CFE _____
- EA _____
- EB _____
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- EC CEBJr/bc _____
- ED Esquires _____
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EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12080 NOV 24 5

FPSC-BUREAU OF RECORDS

COMMUNICATOR SERVICE

I HEREBY CERTIFY that a true copy of the Direct Testimony of Sandra Bysses-Baker on behalf of Sprint Communications Company Limited Partnership has been furnished by U.S. Mail on this 24th day of November 1997, to the following:

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C. Everett Boyd, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

DOCKET NUMBER 970882-TI

**DIRECT TESTIMONY OF SANDEE BUYSSE-BAKER
ON BEHALF OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2

3 **A. My name is Sandee Buysse-Baker and my business address is 10951 Lakeview Drive,**
4 **Lenexa, Kansas 66219.**

5

6 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR CURRENT POSITION?**

7 **A. I am employed by Sprint Communications Company Limited Partnership ("Sprint"). My**
8 **current position is Verification Project Manager.**

9

10 **Q. WHAT ARE YOUR PRIMARY RESPONSIBILITIES AS A VERIFICATION PROJECT**
11 **MANAGER?**

12

13 **A. My responsibilities include managing the Third Party Verification Program, the "Welcome**
14 **Package" program, and the Letter of Agency ("LOA") process for Sprint's sales channels. I**
15 **work with three independent companies contracted by Sprint to function as Inbound Verification**
16 **Call Center, and one company that distributes "welcome package" verification letters. I am**
17 **responsible for the verification systems, budgets, scripting, and daily operations. I am also**
18 **responsible for ensuring that all federal and state rules are being followed as they pertain to**
19 **changes in consumer telecommunications providers.**

20

21

22

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

1 Q. PLEASE SUMMARIZE YOUR TELECOMMUNICATIONS EXPERIENCE AND
2 EDUCATIONAL BACKGROUND.

3
4 A. I began my career with Sprint in 1993. I have held positions of increasing responsibility in
5 sales, sales management, and most recently, vendor operations. I have a Bachelor of Science in
6 Psychology and a Master of Arts in Business Administration from the University of Iowa, in
7 Iowa City, Iowa.

8
9 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

10
11 A. No.

12
13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS DOCKET?

14
15 A. The purpose of my testimony is to explain Sprint's concerns regarding the Florida Public
16 Service Commission's ("Commission") proposed rule changes in Docket Number 970882-TI
17 governing the manner in which local and long distance companies will be required to verify
18 changes in a subscriber's selection of a telecommunications service provider.

19
20 Q. WHAT WOULD SPRINT RECOMMEND CONCERNING THE PROPOSED NEW RULE
21 CHANGES?

22
23 A. Sprint agrees that unauthorized changes in a subscribers' carrier selections, a practice
24 commonly known as 'slamming,' is a significant consumer problem. Slamming clearly impacts
25 all participants in the competitive interexchange market. What is not yet certain, however, is
26 how best to address the problem.

27
28 In Sprint's view the Commission's proposed rule changes are unnecessary as the current rules are
29 adequate and, when adhered to, have the capability to control the slamming problem. However,

1 Sprint recommends that the Commission avoid the indiscriminate application of its rules to all
2 carriers. There appears to be a group of violators that make it a practice not to comply with any
3 verification regulation. The general public would be better served if the Commission would
4 focus on those carriers that intentionally and habitually change a customer's service without any
5 authority or justification. These unscrupulous carriers do not have much investment in the
6 market nor are they interested in doing business in the long term. They are not only violate the
7 Commission's rules, but they disparage reputable companies such as Sprint. Sprint recommends
8 that the Commission detect and eradicate these parasites of the industry.

9
10 Sprint recommends that the Commission adopt rules that are consistent with Federal rules to
11 ensure that carriers are successful in implementing their verification process. There appears to be
12 no basis for differing rules and, in order to maximize overall effectiveness, state and federal rules
13 should be similar. Any interstate carrier that is required to utilize differing verification
14 practices based on an individual state's rules may find itself in violation of either the state or
15 federal requirements. State specific rules should mirror the federal requirements.

16
17 **Q. WHAT ARE SPRINT'S SPECIFIC CONCERNS REGARDING THE PROPOSED RULE**
18 **CHANGES?**

19
20 **A. The Commission's proposed rule 25-4.11(a)(2)(b)(1) & (2) and (c)(1) &(2), would require a**
21 **customer, on a customer-initiated call, to specifically consent to an audio recording of the**
22 **customer's request to allow Sprint to change their Preferred Interchange Carrier ("PIC"). This**
23 **proposed rule change would also require audio recording of the third party verification. Sprint**
24 **believes that an audio recording is of no greater value in verifying the validity of a customer's**
25 **carrier choice than other methods. Obtaining a recording of the conversation between the**
26 **customer and an independent third party verification vendor is an unnecessary additional step**
27 **that increase the cost of verification, and adds no additional security for the customer. The**
28 **'recording' offers no guarantee that the person authorizing the order is the true customer with**
29 **decision making authority for the telephone service. Also, a customer could easily deny that the**

1 recording is their voice. Further, a requirement of customer consent to the recording prior to the
2 sale could deter customers from switching carriers. Some people simply do not want to have
3 their conversations recorded.

4
5 The Commission's proposed rule 25-4.118(4), would prohibit inducements of any kind from
6 being combined with the LOA. Sprint suggests that the proposed rule be clarified to make it
7 clear that negotiable instruments, such as checks, are not to be combined with an LOA. Offering
8 \$100 checks provides an immediate incentive for a non-decision maker to sign a check
9 authorizing a switch in carriers.

10
11 The Commission's proposed rule 25-4.118(2)(d)(5), would require that a postcard be signed by
12 the customer and received by the carrier before submitting a change request to the local provider.
13 If implemented, this rule would not only confuse customers but would impede fulfilling the
14 intentions of the customer to change their PIC. This proposed rule would create customer
15 complaints when service is not connected. Sprint currently sends postcards to customers when
16 Sprint is unable to contact them for verbal verification. Customers are advised that if the
17 postcard is not returned to Sprint canceling the requested PIC change within 14 days, their
18 desired request will be processed. As a general rule, customers usually do not return these
19 postcards; they assume that their long distance service will be switched. Absent some data to
20 indicate that significant slamming complaints are being generated from the postcard option, the
21 present verification method should remain unchanged.

22
23 Proposed rule 25-4.118(2)(d)(6), requires Florida specific information in the informational
24 package. For customers that cannot be verified using third party verification, Sprint sends each
25 new customer a Welcome Package confirming their PIC change order. Each package includes
26 instructions directing the customer to return the enclosed post card if they no longer want to
27 change their PIC. However, if this package were required to contain state specific information,
28 interexchange carriers would incur substantial additional printing and administrative costs. Any
29 increase in administrative costs could impede competition since not all small carriers would have

1 the needed resources. At a time when the industry is encouraging competition, legislation that
2 increases operating costs would have a negative impact to the interexchange market.
3 Additionally, increases such as these could potentially raise the service rates offered to the
4 customer.

5
6 Proposed rule 25-4.118(8), requires that all charges billed on behalf of the unauthorized provider
7 should be credited to the customer by the company responsible for the error. Sprint opposes any
8 rule that would relieve any customer's responsibility for paying for services they received. Rule
9 changes of this type would encourage fraud and bad debt for all interexchange carriers. When
10 customers use and receive benefit from a service they are legally obligated to pay for that service.
11 Any rule that absolves a customer of their financial responsibility only provides incentives for
12 bogus slamming complaints and PIC disputes for the purpose of obtaining free long distance
13 service. Additionally, such a rule would create significant regulatory costs and increase, not
14 decrease, the number of slamming complaints and PIC disputes. This increase in administrative
15 costs will impede the development of competition.

16
17 Proposed rule 25-4.118(10), requires that the verification process be amended to eliminate any
18 reference to any company except the company claiming the customer and the company name of
19 the independent verifier. Sprint believes that identification of the independent verifier will only
20 create customer confusion. Sprint's independent verifier now uses the name of "Verification."
21 Sprint has not received any customer complaints as the result of this procedure.

22
23 **Q. WHAT ADDITIONAL ISSUES THAT CONTRIBUTE TO THE SLAMMING PROBLEM**
24 **SHOULD THE COMMISSION CONSIDER.**

25
26 Sprint believes that there are several factors contributing to the slamming problem. One specific
27 factor can occur at the point of order execution. Although innocent and inadvertent, mistakes by
28 personnel can cause a customer to receive an inaccurate PIC. Individual interexchange carriers
29 and incumbent local exchange carriers process tens of thousands of PIC changes in any given

1 month. In most situations the order entry process is entirely manual. It is therefore reasonable to expect that the probability of human error will always exist.

Another common cause of PIC disputes is buyer's remorse or an allegedly improper decision-maker. In some situations, the customer simply changed their mind about switching to Sprint or the person who made the decision to switch was not authorized to do so. Sprint has also documented cases in which husbands and wives simply disagree. Although the wife may have made the decision to switch to Sprint, the husband wants to retain their original long distance company. An argument follows and slamming complaint is filed.

Also, there are a number of unscrupulous subscribers that allege they have been slammed in order to obtain a refund of the carrier change fee already paid to the ILEC and avoid any new change fees incurred in switching to another carrier.

Sprint examined the reasons that customers change their decision to switch to Sprint during the third party verification process. During the month of July, 1997, of all of the customers processed through third party verification, 93.7 percent confirmed their decision to switch to Sprint. Although the data was not generated from actual PIC Dispute data, it aids in our understanding of PIC Disputes. Sprint found that 24.7 percent of those that did not confirm the sale had changed their minds about switching to Sprint. Sprint also found that less than 1 percent of all orders processed in third party verification were canceled due to either Sprint personnel entering an incorrect number, or the customer providing an incorrect number. Sprint has found that even in those cases in which Sprint obtains the customer's signed LOA, the telephone number provided by the customer may be incorrect.

Additionally, slamming is not always the result of an error on the part of the long distance carrier. ILECs maintain control of the carrier change process. When a customer calls their local telephone company business office to complain of an unauthorized PIC change, it is far easier for the ILEC to attribute the error to unaffiliated interchange carriers and ALECs. The ILEC has the opportunity to "bury" any mistakes by blaming other carriers. This is a reasonable

1 presumption. The ILEC need only make the change requested by the customer and is free to
2 attribute the unauthorized PIC change to slamming by the interexchange carrier. In today's
3 increasing competitive environment, this is yet another opportunity for the ILEC to damage the
4 reputations of their competition and further a strategy of attacking competition generally.

5
6 Sprint would also like to make the point that most alleged slamming seems to result when
7 customers sign-up for service from a reseller. The local telephone company records will show
8 the customer connected to the underlying facilities-based company, not the reseller, so, even
9 though the customer has not been slammed, it might appear otherwise. A large number of
10 resellers resell Sprint service, using Sprint's Carrier Identification Code ("CIC"), so the
11 opportunity for confusion is significant. Sprint has been aggressively working with its resellers
12 to inform their customers of the fact, in order to try to minimize this confusion.

13
14 **Q. WHAT FACTORS MOTIVATE SPRINT TO MINIMIZE THE UNAUTHORIZED**
15 **CONVERSION OF CUSTOMERS?**

16
17 **A. The competitive market. No interchange carrier that values its name and reputation will**
18 **deliberately engage in slamming. It makes no sense, either from a business perspective or for**
19 **economic benefit, to do so. Slamming makes it harder for the interexchange carrier to compete**
20 **in the marketplace because it will quickly destroy valued customer goodwill the carrier has**
21 **worked hard to generate. Slamming also increases the carrier's customer service costs associated**
22 **with handling slamming calls and inquires forwarded to the carrier by both federal and state**
23 **officials. In addition, slamming has no lasting revenue effect because slammed customers are**
24 **eventually returned to their carrier of choice. The competitive market provides the necessary**
25 **motivation for any interexchange carrier that has substantial fixed investment and is in the**
26 **market for the long term to minimize any factor that results in the unauthorized conversion of a**
27 **customer to a service they did not chose.**

1 Q. WHAT ADDITIONAL SAFEGUARDS DOES SPRINT RECOMMEND THAT THE
2 COMMISSION ADOPT?

3
4 A. Sprint recommends that the commission consider adopting rules that are clearly in the public
5 interest. This type of rule changes should be based on a complete understanding of why
6 slamming occurs. I have mentioned earlier that there are certain situations that appear as
7 slamming but in reality are not; such as buyers remorse, personnel errors in the order entry
8 process, and blatant misrepresentation by the ILECs.

9
10 The rules that the Commission have proposed will not be particularly helpful in reducing
11 slamming. For example, the third-party verification process currently used by Sprint, has been
12 very successful in determining buyers remorse. This situation is clearly an element of doing
13 business in the today's competitive telecommunication industry. The rules the Commission
14 seeks to implement will not reduce buyers remorse.

15
16 As stated earlier, there is already enormous financial pressure to minimize employee mistakes
17 occurring during the order entry process. These mistakes are inefficient and costly. Sprint
18 corrects these errors through its "no-fault" policy. When Sprint receives a PIC dispute from the
19 customer's ILEC, we instruct such ILEC to return the complaining customer to his previous
20 carrier and reimburses the customer for all carrier change charges incurred. Sprint not only
21 incurs the PIC change fee but also incurs the administrative costs associated with handling these
22 disputes. Although Sprint rectifies each customer PIC dispute by reimbursing the change charge,
23 Sprint is not always the carrier that made the error. A very high percentage of our new customer
24 orders are processed by the ILEC. As I have noted earlier, ILECs have already demonstrated a
25 propensity to exploit the slamming issue for their own competitive purpose. If the Commission
26 is to minimize mistakes in the execution of PIC changes, it needs to relieve the ILEC of their
27 control of the PIC change process. The carrier change order process should be assigned to a
28 neutral third party. Neutral third party administration would ensure equal treatment of all
29 carriers and avoid any appearance of impropriety or anti-competitive behavior. Sprint

1 recognizes, however, that it may take some time to accomplish this goal. Therefore, Sprint
2 recommends the Commission adopt measures that would minimize ILEC indiscretion in
3 administering the PIC change process.

4
5 The Commissions proposed regulations are also unlikely to have any beneficial impact on
6 slamming caused by the fraudulent practices of unscrupulous carriers. These carriers currently
7 do not comply with the FCC's rules designed to curtail slamming and are unlikely to obey any
8 new anti-slaming regulations this Commission may adopt. What is needed to deter the fraud
9 practiced by such carriers and their agents is not more verification or reporting requirements or
10 additional rules of any kind, but rather criminal prosecution and fines for those who deliberately
11 set out to steal customers from carriers of their choice.

12
13 Sprint recommends that no rules be implemented to verify PIC changes resulting from inbound
14 telemarketing efforts. Until evidence is presented that a slamming problem exists as a result of
15 this operation, the benefits of verifying PIC changes outweigh the substantial costs of such
16 verification.

17
18 Q. COULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

19
20 A. Sprint is currently in compliance with the FCC rules relating to Common Carriers' regarding
21 verification of orders for long distance service generated by telemarketing. State specific rules
22 that vary from the federal rules place Sprint in the difficult, if not impossible, role of trying to
23 comply with the various individual state and federal rules. Sprint systems, methods and
24 procedures, and contractual agreements with third party vendors, often make it difficult to adapt
25 quickly, or at all, to state specific requirements. Rules absolving customers of liability in the
26 event of an unauthorized change in telecommunications providers only provides incentives for
27 fraudulent claims. There are enormous financial and public relations pressures to minimize
28 unauthorized switched in telecommunications providers for companies with a long term vested

1 interests in the industry. Sprint recommends that the Commission relieve the ILECs of their
2 control of the PIC change process and assign this responsibility to a neutral third party. As stated
3 earlier, it will take time to accomplish this goal. In the interim, if the Commission would adopt
4 rules to discourage ILEC mishandling of the PIC change process, it could ensure that slamming
5 claims are legitimate and could potentially gain access to the root cause of slamming.
6 Furthermore, Sprint believes that the Commission should delay implementing any rule changes
7 until the FCC finalizes its forthcoming rulemaking.

8

9 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

10

11 **A. Yes.**

12

13

14

15

16

17

18

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Direct Testimony of Sandee Buysse-Baker on Behalf of Sprint Communications Company Limited Partnership has been furnished by U.S. mail on this 24th day of November 1997, to the following:

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970882-71

LIST OF ADDRESSES

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