

REQUEST TO ESTABLISH DOCKET

(PLEASE TYPE)

Date June 26, 2002

Docket No. 020595-72

- 1. Division Name/Staff Name GCL/Division of Competitive Markets and Enforcement/ P. Christensen
- 2. OPR X
- 3. OCR Division of Competitive Markets and Enforcement/Bureau of Service Quality

4. Suggested Docket Title Complaint of J. Christopher Robbins against BellSouth Telecommunications,] for violation of Rule 25-4.073(c), Florida Administrative Code

5. Suggested Docket Mailing List (attach separate sheet if necessary)

- A. Provide NAMES OR ACRONYMS ONLY if a regulated company.
- B. Provide COMPLETE NAME AND ADDRESS for all others. (Match representatives to companies.)
 - 1. Parties and their representatives (if any):

<u>J. Christopher Robbins</u>	<u>BellSouth Telecommunications, Inc.</u>
<u>P.O. Box 248392</u>	<u>Nancy White c/o Nancy Sims</u>
<u>Coral Gables, Florida 33124</u>	<u>Suite 400</u>
<u>(800) 934-5999 or (305) 740-0385</u>	<u>Tallahassee, Florida 32301-1556</u>
	<u>(850) 224- 7798</u>

2. Interested persons and their representatives (if any):

6. Check one:

- Documentation is attached.
- Documentation will be provided with recommendation.



J. Christopher Robbins, J.D.

P.O. Box 248392, Coral Gables, FL 33124
Tel: 305-740-0385 | Cell: 305-815-7074 | Fax: 603-484-1280
Email: jc@jcrobbs.com

June 3, 2002

Ms. Lila A. Jaber, Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED

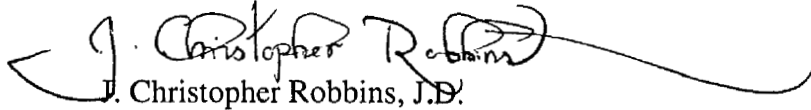
JUN 7 2002

Florida Public Service Commission
CHAIRMAN JABER

Dear Ms. Jaber:

Please find a complaint against Bellsouth Telecommunications, Inc.

Sincerely,


J. Christopher Robbins, J.D.

**PUBLIC SERVICE COMMISSION,
STATE OF FLORIDA**

Case No.

J. CHRISTOPHER ROBBINS,

Petitioner,

v.

**BELLSOUTH
TELECOMMUNICATIONS, INC.,
A Georgia Corporation,**

Respondent.

COMPLAINT

Petitioner, J. CHRISTOPHER ROBBINS (“Robbins or Petitioner”) files this complaint for administrative action and damages against BELLSOUTH TELECOMMUNICATIONS, INC. (“BellSouth”) and alleges as follows:

PARTIES

1. BellSouth is an incumbent local exchange telecommunications services provider in Florida. BellSouth is a Georgia Corporation, with its principal places of business at 1155 Peachtree St. N.E., Atlanta, GA.

2. J. Christopher Robbins is a Florida resident. He resides in Dade County. He is a BellSouth customer.

JURISDICTION

3. The Florida Public Service Commission has jurisdiction over this complaint pursuant to Fla. Stat. § 350.127 and Fla. Stat. § 120.536. Petitioner has standing to bring this complaint.

COUNT I:

4. The law of Florida and this commission requires that:

At least ninety (90%) percent of all calls directed to intercept, directory assistance and repair services and eighty (80%) percent of all calls to business offices shall be answered within thirty (30) seconds after the last digit is dialed. *See*, Fla. Public Serv. Commission R. 25-4.073(c).

5. BellSouth is violating Fla. Public Serv. Commission R. 25-4.073(c).

6. Fewer than ninety (90%) percent of all calls directed to intercept, directory assistance and repair services and less than eighty (80%) percent of all calls to business offices are answered within thirty (30) seconds after the last digit is dialed.

7. BellSouth's violation of the answering time requirements has not been excused.

8. BellSouth's violation is not the result of strikes, work stoppages, riots, insurrections or any other factors that may, upon application to this commission and approval, justify such a violation.

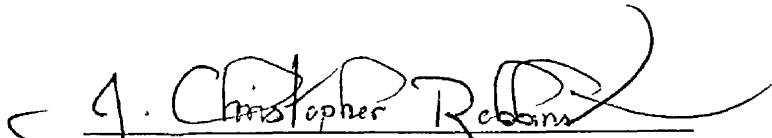
9. As a consequence of BellSouth's violation, Petitioner and all residents of the State of Florida have, and continue to, suffer damages, compensatory damages, lost profits, lost productivity, as well as non-pecuniary damages.

RELIEF REQUESTED:

WHEREFORE, Petitioner Robbins prays that the Public Service Commission:

- 1) Initiates show cause proceedings against BellSouth;
- 2) Permits Petitioner Robbins to conduct discovery;
- 3) Conducts an investigation;
- 4) Publishes complete findings of the investigation;
- 5) Awards compensatory damages to all BellSouth customers.

Submitted this 3rd Day of June, 2002 by:


J. Christopher Robbins, *Pro Se*

J. Christopher Robbins
P.O. Box 248392
Coral Gables, FL 33124
(800) 934-5999



BEGIN COMPLAINT COMPLAINT CUSTOMER SUBMISSION REVIEW
COMPLAINT INFORMATION DETAILS INFORMATION OPTIONS INFORMATION

Your online complaint now will be sent to the
Florida Public Service Commission.

Please review your information to ensure that it is correct. If there is a mistake, please choose the applicable "Make Corrections" button to make the necessary changes. **Once you click "Submit Complaint," you will not be able to make any more changes to your complaint.**

SUBMIT COMPLAINT

Complaint Type

Utility Type: Telecommunications

Telecommunications Type: Local Service Provider

MAKE CORRECTIONS

Complaint Information

Utility Name: BellSouth Telecommunications, Inc.

Have you previously contacted the utility?: Yes

If so, with whom did you speak? Many individuals

Date you contacted the utility: 06/03/2002

Have you previously contacted the PSC? Yes

If so, with whom did you speak? Will provide list and call logs

Date you contacted the PSC: 06/03/2002

Type of problem you are having: Other Complaints

MAKE CORRECTIONS

Problem Information

Describe your concern: I intend to press a claim against Bell South because they are violating sec. 25-4.073. I will show that less than ninety (90%) percent of all calls directed to intercept, directory assistance and repair services and less than eighty (80%) percent of all calls to business offices ARE NOT answered within thirty (30) seconds after the last digit is dialed, as required by law.

MAKE CORRECTIONS

Customer Information

Service Address

Account Number: **305 740 0385 477 0449**

Business Account Name: Jay Robbins

Business Account Name: Jay Robbins

Name: Jay
Christopher Robbins

Name: Jay
Christopher Robbins

Address: P.O. Box 248392

Address: P.O. Box 248392

City: Coral Gables

City: Coral Gables

State: FL	State: FL
Zip: 33124	Zip: 33124
County: Dade	County:
E-Mail: jc@jcrobbins.com	E-Mail: jc@jcrobbins.com
Daytime Telephone: (305) 815-7074	Daytime Telephone:
Evening Telephone:	Evening Telephone:

Preferred Method of Contact: **Postal**

MAKE CORRECTIONS

Your online complaint will now be sent to The Florida Public Service Commission

Please review your information to ensure that it is correct. If there is a mistake, please choose the applicable "Make Corrections" button to make the necessary changes. **Once you click "Submit Complaint," you will not be able to make any more changes to your complaint.**

SUBMIT COMPLAINT

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Florida Public Service Commission

2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
1-800-342-3552



External Complaint Tracking System
ADDING NEW RECORD

06/12/2002

Printed by: MHILTON

Chairman No. 00461

CAF No. <none>

COMPLAINT BY

Name **J. CHRISTOPHER ROBBINS**
Address P.O. BOX 248392
CORAL GABLES FL 33124
Work Phone 305-740-0385 FAX 603-484-1280
Home Phone <none> Email JC@JCROBBINS.COM
Organization <none>

DESCRIPTION OF COMPLAINT

Correspondence Date 06/03/2002
Communication Method LETTER
Nature TELEPHONE SERVICE
Company Name **BELLSOUTH**
Description <none>

PSC ACTION

Date Entered 06/11/2002 Action Date //
Due Date // Date Closed //
Division Assigned GCL
Staff Assigned BETH KEATING
Action Taken <none>
Notes RESPOND AND UPDATE JOANN CHASE