

State of Florida



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: March 15, 2012
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Judy G. Harlow, Senior Analyst, Division of Regulatory Analysis
RE: Docket No. 110303-OT

A handwritten signature in blue ink, appearing to read "J. Harlow", written over the "FROM:" line of the memo.

Please enter the following responses to staff survey regarding Rule 25-22.032, F.A.C., in the docket file for Docket No 110303-OT. The responses were mailed directly to me.

1. Kemple Water Company (3 pages)
2. FSH Communications, LLC (5 pages)

RECEIVED 1103
12 MAR 16 AM 10:31
COMMISSION
CLERK

DOCUMENT NUMBER - DATE

01590 MAR 16 2012

FPSC-COMMISSION CLERK

12 MAR 13 AM 8:30
DIVISION OF
REGULATORY COMPLIANCE

12 MAR 13 11:03 27

March 7, 2012

To:
Judy Harlow
c/o Ann Cole
Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Industry survey for legislative review of agency rules in effect on or before November 16, 2010
Docket No. 110303-OT

My name is Jan Eddy, and I am the Retail Product Manager for FSH Communications, LLC, a payphone company headquartered in Chicago, Illinois. I am responding as FSH's representative to this survey. **My answers to each question follow each of the survey questions listed below, and is bolded.** As some background, FSH currently operates a grand total of seven (7) payphones in the entire state of Florida and we have never had a complaint since we acquired phones in Florida in mid-2008. My email address is jan.eddy@fshcommunications in case you have any questions.

1. What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

FSH Answer: FSH has not incurred any transactional costs resulting from Rule 25-22.032.

- a. For the five year period beginning July 1, 2011, which requirements of Rule 25-22.032, F.A.C., if any, would be performed by the Company assuming the rule were not in effect? Please explain.

FSH Answer: FSH answers all complaints from customers from customers in a timely manner, normally within one business day, and attempts to satisfy a customer's concern or issue to their satisfaction, and we note our records accordingly depending on the issue. FSH prides itself on its customer service. As a payphone provider we deal with issues having to do with the physical payphone itself, such as repairs, or call quality, or coin issues. We select vendors who share the same values in regards to customer service, who provide the operator services on our payphones. We handle any complaints dealing with the physical payphone itself for both site providers and end user customers. If a customer complains about an operator handled, alternatively billed call, we refer the customer to the appropriate vendor, and follow up with the vendor to make sure

DOCUMENT NUMBER-DATE

01590 MAR 16 2012

FPSC-COMMISSION CLERK

the customer was satisfied. We do this regardless of what state the complaint comes from.

- b. For each of the requirements identified in 1a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011?

FSH Answer: There were no transactional costs associated with the requirements as a result of the rule, as we handle customer service as a priority and the rule actually is probably not as stringent as our own internal customer service policies.

- c. What are your actual transactional costs resulting from your Company's compliance with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011?

FSH Answer: With no complaints there are no actual transactional costs during the above named time period.

2. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

FSH Answer: Since FSH already has a stringent customer complaint resolution process there are no additional costs and/or benefits on our own small business. We currently have payphones in the majority of the United States and we conduct our business with the same eye to customer satisfaction regardless of the state we operate within.

3. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

FSH Answer: FSH has no input of the likely impact on small counties and small cities for implementing 25-22.032.

4. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

FSH Answer: FSH has no input of the likely impact on other entities for implementing 25-22.032.

5. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the company's service territory?

FSH Answer: FSH has no input of the expected impact on economic growth, private sector job creation or employment, and private sector investment due to the implementation of this Rule.

6. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

FSH Answer: FSH has no input on the expected impact of business competitiveness, or the expected ability of persons doing business in the Company's service territory, competing with persons doing business in states other than Florida or other domestic markets.

7. What does the Company believe are the benefits of Rule 25-22.032, F.A.C.?

FSH Answer: I believe the benefits of the Rule are for the consumer or individual who feels that they have been unable to achieve satisfaction to a complaint of a regulated entity. I believe if a business has a good customer service policy in place already, a company should rarely, if ever, need to worry about what the Florida rules entail for reporting.

8. Assuming Rule 25-22.032, F.A.C., is unchanged over the next five years, do you expect your Company's costs to comply with the rule going forward, to increase, decrease, or remain the same. Please explain your response.

FSH Answer: It is not our intent to change our current customer service policy, and we do expect our costs to remain the same. If FSH were to get a formal complaint there would be costs associated with not only taking care of the customer, but also responding to the commission staff. The postage, long distance phone calls, and wages would be an added cost, but at our current complaint rate, it is not anticipated to change much over the next five years.

9. Does your Company currently have procedures/personnel in place to address complaints received directly from your consumers?

FSH Answer: FSH has both procedures and personnel in place to address complaints received directly from our customers.

10. If Rule 25-22.032, F.A.C., were repealed would your Company continue to accept and address consumer complaints? Please explain your response.

FSH Answer: If FSH wants to remain in business and retain their important customers, we will need to continue to accept and address consumer complaints in the same manner. We feel it provides us a competitive advantage, and is one of the tenets our business was founded on.

11. Do you believe the costs, if any, incurred by your Company to comply with the records retention, reporting, and auditing requirements of Rule 25-22.032(10), F.A.C., for the five

year period beginning July 1, 2011, if any, have an adverse impact on your Company? If so, please provide any and all data which supports your response.

FSH Answer: FSH is not participating in the telephone transfer connect plan, nor the email transfer plan, so we feel that any costs incurred in answering complaints in Florida, if we were to receive any, and retaining good records and documentation, will not have an adverse impact on our Company.

12. Of the transactional costs estimated to be associated with compliance with 25-22.032, F.A.C., what percentage is spent on the following items:

- a. Staffing (75%)
- b. Document storage and retention
- c. Postage and shipping (20%)
- d. Communications (dedicated phone lines, emails or faxes) (5%)
- e. Other

FSH Answer: FSH does not estimate any increased transactional costs for complying with 25-22.032, with the exception of the potential costs for postage or faxes if required, and the added staffing expense of not only responding to the customer, but also the commission staff in Florida. I have estimated the percentages by each category above.

13. How many staff members at your Company are currently responsible for handling consumer complaints associated with 25-22.032, F.A.C.?

FSH Answer: FSH has two customer care representatives that work in our Customer Care Center, one supervising manager, and a Sale Director. They handle customer calls from all over our serving region in the United States.

- a. Are they full time employees?

FSH Answer: Yes.

- b. Do these employees have responsibilities apart from handling complaints?

FSH Answer: Yes, as handling complaints is not a full time job.

14. Section 3 of Rule 25-22.032, F.A.C., states that a customer's service shall not be discontinued during the complaint resolution process. Have there been instances within 2010 through 2011, when your Company was uncompensated for service provided as a result of a billing dispute?

FSH Answer: FSH has had no complaints and does not supply a product in Florida currently where we bill the customer for their payphone line or phone.

- a. In the majority of these cases, is the Company able to recoup these costs after the complaint is resolved?

FSH Answer: NA

15. Does your Company subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system?

FSH Answer: FSH does not subscribe to the "transfer-connect" or email transfer system.

- a. What are the annual costs associated with subscription to these systems, including costs due to additional requirements for staffing, operating hours and document retention?

FSH Answer: NA

16. Approximately what percentage of complaints are resolved prior to reaching the Informal Conference stage described in section 8 of Rule 25-22.032, F.A.C.?

FSH Answer: FSH has never had a complaint in Florida.

- a. How many times has your Company had a consumer complaint that has escalated all the way to the informal conference stage in the previous two years?

FSH Answer: NA

- b. How many times within 2010 through 2011, has your Company had a complaint process that was escalated beyond the informal conference stage?

FSH Answer: NA

17. Approximately what percentage of complaints from your customers filed with the Florida Public Service Commission are successfully resolved within 30 days?

FSH Answer: FSH has had no complaints filed with the Florida Commission.

18. How has Rule 25-22.032, F.A.C., affected the way your Company processes complaints?

FSH Answer: No.

- a. Has the rule had a positive, negative, or neutral impact on your Company?

FSH Answer: Neutral.

- b. How has the rule affected the Company's cost of handling complaints?

FSH Answer: No

Kempler Water Company 227-W
37502 Manchi FF Terrace
Zephyrhills, FL 33541

Docket No. 11303-OT

Dear Ms. Judy Harlow

1. We would have zero cost.
 - A. we would handle any complaints
 - B. we would have zero cost
 - C. we have had no cost.
2. we would likely have no impact.
3. we would have no impact.
4. we would have no impact.
5. we would have none.
6. we would have none.

7. To speed up any complaints

8. To ~~remain~~ the same

9. we have my husband and myself.

10. Yes, as we have in the past

11. we seldom have any complaints

12. A. 0

B. 0

C. 0

D. 0

E. 0

13. I myself and my husband.

A. yes

B. yes.

14. No
A. Yes

15. No
A. None

16. None
A. None
B. None

17. 100%

18. No
A. Neutral impact
B. None

Mrs. Christina Kemple
Kemple Water Co. 227-W

Kemple Water Company
Richard A. or Christina Kemple
37502 Marcliff Terrace
Zephyrhills, Fl. 33541

TAMPA FL 335
SAINT PETERSBURG FL
12 MAR 2012 PM 11 L

POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



12 MAR 14 11 42 AM '12
DIVISION OF
REGULATORY COMPLIANCE
Ms Judy Harlow
Ann Cole
Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Ave Boulevard
Tallahassee, Florida 32399-0850

12 MAR 14 11 42 AM '12

32399-0850-55



FSH COMMUNICATIONS LLC

Janice Eddy
160 MONTGOMERY LANE
Port Ludlow, WA 98365-9602



12 MAR 13 AM 6:48

TO: JUDY HARLOW
C/O ANN COLE
COMMISSION CLERK
OFFICE OF COMMISSION CLERK
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-085

