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Southern Bell

Mary Jo Peed
Attorney

Legal Department
4300 Southern Bell Center
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404 529-7208

May 31, 1991

**ORIGINAL
FILE COPY**

Steve Tribble
Director, Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

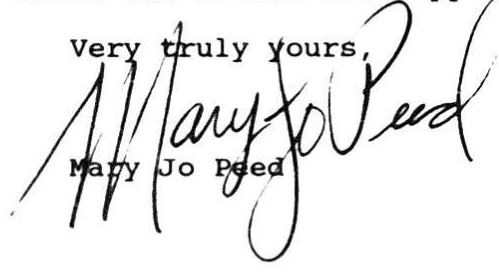
Re: FPSC Docket No. 910060-TP

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Comments and Suggestions to the Proposed Amendment of Rule No. 25-4.110, F.A.C., as Published in the May 10, 1991 Edition of the Florida Administrative Weekly in the above-referenced docket. Service is being provided to all parties of record in accordance with the attached Certificate of Service.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me.

Very truly yours,



Mary Jo Peed

- ACK
- AFA _____
- APP 1
- CMF _____
- CMH _____
- CTR _____
- EIR _____
- LES _____
- LIH 6
- OPC _____
- RCH 1
- SEC 1
- WAS _____
- OTH _____

Enclosure

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

RECEIVED & FILED
10F
FFJORDON WU BY FAX 5/31/91

DOCUMENT NUMBER 910060-TP
05503 MAY 31 1991
DIVISION OF RECORDS & REPORTING

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

**ORIGINAL
FILE COPY**

Re: Amendment of Rule 25-4.110, F.A.C.,)
pertaining to customer billing.)

Docket No. 910060-TP

Filed: May 31, 1991

**SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S COMMENTS AND SUGGESTIONS TO THE
PROPOSED AMENDMENT OF RULE 25-4.110, F.A.C.,
AS PUBLISHED IN THE MAY 10, 1991 EDITION
OF THE FLORIDA ADMINISTRATIVE WEEKLY**

COMES NOW, Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to the Notice of Rulemaking published in the May 10, 1991 edition of the Florida Administrative Weekly, and offers the following comments and suggestions to said proposed rule:

1. Proposed Section 25-4.110(1)(a) states that "[c]harges for 900 or 976 calls shall be segregated from charges for regular long distance or local charges by appearing separately under a heading that reads as follows: '900 or 976 non-regulated charges.'" Southern Bell currently provides billing for 976 service providers via Section A13.18.1 of Southern Bell's General Subscriber's Services Tariff (GSST). 976 Service is offered by Southern Bell to information providers through a direct tariff relationship with the information provider. Southern Bell already segregates 976 charges from charges for regular long distance or local charges under a heading "976 Service Calls Billed For Sponsor(s)." (See Attachment "A") Therefore, with respect to 976 Service, Southern Bell's current practice complies with the spirit of the segregation requirement contained in the

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RECORDS/REPORTING

proposed rule. 976 Service is a direct Southern Bell offering to information providers and 976 charges are billed on Southern Bell's portion of an end users' telephone bill. Accordingly, Southern Bell suggests that the heading required under the proposed rule for 976 Service be on the Southern Bell services portion of the bill and read as follows: "976 nonregulated charges."

2. With respect to the segregation of 900 charges, Southern Bell suggests segregating 900 charges on each individual carrier's bill page contained within an end user's bill under a heading of "900 nonregulated charges rather than creating a separate page for each individual carrier's 900 charges. Segregation of these 900 charges in a manner similar to what is already done for 976 charges will accomplish the disclosure intent of the proposed rule while not unnecessarily adding additional length to the end user's bill.

3. Proposed Section 25-4.110(a)(1) and (2) require that clear and conspicuous messages concerning 900 and 976 services appear on each page containing 900 or 976 charges. These messages would state that the nonpayment of 900 and 976 service charges will not result in the discontinuance of service and that customers can obtain blocking of 900 or 976 services from the local exchange company. Southern Bell is not opposed to informational messages concerning 900 and 976 services being included on the bill. However, Southern Bell does not favor the proposed informational statements appearing on every page. The


requirement of this information on every page would add length and thus additional cost to the bill. Southern Bell estimates that the additional billing cost would be a total nonrecurring cost of \$31,624.98 and a total yearly recurring of \$238,030.09. Furthermore, emphasis on the statement "nonpayment of 900 or 976 service charges will not result in disconnection of local service" could unintentionally encourage customers to use services for which they do not intend to pay.

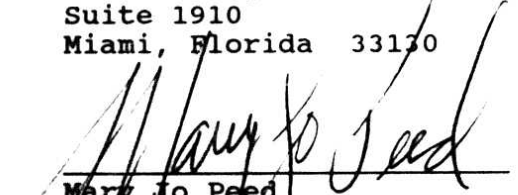
4. Southern Bell suggests that the proposed disclosure regarding 900 and 976 charges be included on the summary page of the bill. The summary page of the bill is the page which is most closely examined by end users as this is the page from which they pay their telephone bills and receive information regarding the local or toll free telephone numbers to call in case of inquiries regarding charges which appear on the telephone bill.

5. Southern Bell could also provide periodic information regarding unregulated services, charges, responsibilities, blocking, no disconnection policy, etc., in the Southern Bell Tel News, which is the customer information mailing included in the monthly telephone bill. Additionally, Southern Bell could include information about 900 and 976 service through the customer guide in the White Pages Directory.

Respectfully submitted this 31st of May, 1991.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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CERTIFICATE OF SERVICE
Docket No. 910060-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 31st day of May, 1991, to:

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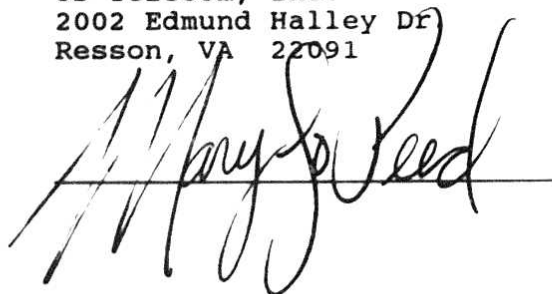
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Sherman Oaks, CA 91403

Craig Dingwall
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Resson, VA 22091

A handwritten signature in black ink, appearing to read 'Craig Dingwall', is written over a horizontal line. The signature is stylized and cursive.



Southern Bell
A BELL COMPANY

Monthly Service Charges (continued)

4. Directory Assistance (DA) Usage

Call(s) to Local DA at no charge
Call(s) to Local DA at 6.25 each
Call(s) to 888-1212 at 8.25 each

Subtotal

AMOUNT	TOTAL
5.25	36.83
0.00	
.14	
	.16
34.99	36.99
	2.64
1.63	
1.78	
1.07	

Other Charges and Credits

May 7 8 25 2011

9. 2011 (or 911) installation charges. This charge has been placed on your bill by Broward County

10. 2011 (or 911) monthly charges. This service charge is billed on behalf of BROWARD COUNTY

Subtotal

976 Service Calls Billed for Summary

Date	Place Called	Number Called	Rate	Time	Mins.
7. MAY 11	976 SERVICE	305 976-7678		1106PM	8

Subtotal

Operator Initiated Calls

Date	Place Called	Number Called	Rate	Time	Mins.
8. MAY 8	FR W PALM	FL 407 589-1876	ARS	337PM	6
9. MAY 9	FR W PALM	FL 407 471-9793	ARS	1230AM	1

Subtotal

Calling Card Calls

Date	Place Called	Number Called	Rate	Time	Mins.
10. APR 28	MIAMI	FL 305 873-2327	ARC	1230AM	1
	PR FT LBL	FL 305 870-3489			
11. MAY 9	HOLLYWOOD	FL 305 452-7879	AEO	827PM	8
	PR MIAMI	FL 305 384-8717			
12. MAY 10	HOLLYWOOD	FL 305 452-7879	AOO	1118AM	8
	PR MIAMI	FL 305 809-5688			

Rate Applied - See Back of Page

CP 008796

(CONTINUED)

ATTACHMENT "A"