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URGENT
JUN 26 1992

June 26, 1992

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 920260-TL
Docket No. 910163-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced dockets on behalf of the Citizens of the State of Florida are 15 copies of the Citizens' 1st Set of Requests for Admissions.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

- ACK
- AFA 6
- APP
- CAF
- CMU
- CTR
- EAG
- LEG 1
- LIN
- OPC
- RCH
- SEC 1
- WAS
- OTH Lead

Enclosure

Sincerely,

Charles J. Beck
Charles J. Beck
Deputy Public Counsel

RECEIVED & FILED

DOCUMENT NUMBER-DATE
FPSC-BUREAU OF RECORDS JUN 26 1992

06885-92

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)
Integrity of Southern Bell's) Docket No. 910163-TL
Repair Service Activities and)
Reports)
_____)

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: June 26, 1992
Bell Telephone & Telegraph Company)
_____)

CITIZENS' FIRST SET OF REQUESTS FOR ADMISSIONS

The Citizens ("Citizens") of the State of Florida, by and through Jack Shreve, Public Counsel, request BellSouth Telecommunications, Inc., d/b/a/ Southern Bell Telephone and Telegraph Company ("BellSouth" or "Company"), pursuant to section 350.0611(1), Florida Statutes (1991), Florida Rule of Civil Procedure 1.370, and Commission Rules 25-22.034 and 25-22.035, to admit the following enumerated matters in writing on or before July 24, 1992 for the purpose of this action only and subject to all pertinent objections to admissibility which may be interposed at hearing.

STATEMENTS OF FACT

1. On or before June 1991, BellSouth initiated an internal review of allegations of falsification of customer trouble reports by employees throughout its operations in Florida.

2. On or before June 1991, BellSouth initiated a personnel review of higher level managers in Florida and Georgia pertaining to the extent of falsification of customer trouble reports by company employees.

3. As a result of BellSouth's findings from the review conducted, the company disciplined a number of employees found to have falsified customer trouble reports.

4. As a result of BellSouth's findings from the review conducted, the company disciplined a number of employees found to have condoned the falsification of customer trouble reports.

5. As a result of BellSouth's findings from the review conducted, the company terminated a number of employees found to have condoned the falsification of customer trouble reports.

6. As a result of BellSouth's findings from the review conducted, the company terminated a number of employees found to have falsified customer trouble reports.

7. BellSouth took no action against employees found to have falsified customer repair documents, who had retired or were no longer employed by the company as of June 1991.

8. The number of employees listed for discipline in any particular district is not indicative of the extent of the falsification due to employees leaving the Company, transferring to another district or retiring.

9. The number of people listed for discipline in any particular district is not indicative of the extent of the falsification because BellSouth's review committee interviewed a number of employees who reported instances of falsification by others of which they were personally aware, but for which they were not disciplined.

10. BellSouth had approximately 304 management level employees overseeing the handling of customer trouble reports in the installation and maintenance centers (IMCs) in 1991.

11. As a result of BellSouth's internal investigation, over one third of its IMC management personnel were disciplined.

12. As a result of BellSouth's internal investigation, over one fourth of its IMC management personnel were disciplined.

13. As a result of BellSouth's internal investigation, over one fifth of its IMC management personnel were disciplined.

14. The disciplining of employees for falsification of customer records is a business decision.

15. BellSouth instituted a number of changes to its customer trouble reporting, repair and rebate systems based upon the information obtained by the review committee.

16. BellSouth's review uncovered instances of employee falsification of customer trouble reports in North Broward, Ft. Pierce, South Broward, Central Dade, South Dade, North Dade, Miami, West Palm Beach, Gainesville, Jacksonville, and Orlando.

17. BellSouth's review uncovered factual evidence that upper level management knew of employee falsification of customer trouble reports in its Florida operations.

18. BellSouth uncovered factual evidence of falsification of customer trouble reports being used to meet the Florida Public Service Commission [PSC] rule 25-4.110(2), which includes but was not limited to the following:

- a) backing up the clearing time to show a repair cleared within 24 hours;

- b) the improper use of no-access [NAS] intermediate status code to stop the 24 hour repair clock;
- c) the improper use of the carried over no [CON] intermediate status code to stop the 24 hour repair clock;
- d) the misuse of disposition codes for closing customer trouble reports to exclude a trouble report from the PSC repair index;
- e) the closing of trouble reports before the trouble was repaired and reopening them as new reports to avoid exceeding the 24 hour clock;
- f) the statusing of affecting service troubles as out of service to build the out of service base in order to meet the PSC 95% repair completion index;
- g) the misuse of non-regulated wire disposition codes to exclude out of service over 24 hour troubles; and
- h) the use of unassigned or fake employee codes to improperly code customer trouble reports.

19. As a result of employees falsifying customer repair records, customers did not receive rebates that were due and owing under the PSC rules 25-4.110(2) and 25-4.070(1)(b).

20. The extent of employee falsification of customer repair records was motivated by the incentive regulation plan and a bonus pay plan (Key Service Results Indicator results) that was based upon PSC rule performance.

21. BellSouth's 1991 third quarter internal audit of the PSC schedule 11's submitted by the company contains significant adverse findings.

22. BellSouth's 1991 third quarter internal audit of the Mechanized Out of Service Adjustment system [MOOSA] contains significant adverse findings.

23. BellSouth's 1991 third quarter internal audit of the Key Service Results Indicator [KSRI] contains significant adverse findings.

24. BellSouth's 1991 third quarter internal audit of its Loop Maintenance Operations System [LMOS] contains significant adverse findings.


25. BellSouth's third quarter internal audits factually demonstrate that customer repair records were improperly processed by employees.

26. BellSouth's third quarter internal audits factually demonstrate that customer repair records were improperly processed by employees in order to meet the PSC rule requirements.

27. BellSouth's third quarter internal audits factually demonstrate that customer repair records were falsified by employees in order to meet the PSC rule requirements.

28. BellSouth's third quarter internal audits factually demonstrate that if proper processing of customer repair records had been done the company would not have met the PSC rule requirements for completing 95% of out of service troubles within 24 hours.

29. BellSouth's third quarter internal audits factually demonstrate that if proper processing of customer repair records had been done the company would not have met the PSC rule requirements for rebating customers for service outages exceeding 24 hours.


Charles J. Beck
Deputy Public Counsel

**CERTIFICATE OF SERVICE
DOCKET NO. 910163-TL**


I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following persons on this 26th day of June, 1992.

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**CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 26th day of June, 1992.

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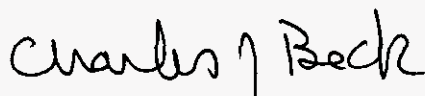
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