



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

ORIGINAL
FILE COPY

July 21, 1992

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Public Counsel's Motion to Compel, Filed July 20, 1992,
Docket No. 910163-TL - Repair Service Investigation

Dear Mr. Tribble:

Enclosed please find an addendum to the Motion to Compel filed July 20, 1992. These charts are the attachments referred to in Mr. Baer's affidavit and should accompany the motion. An original and fifteen copies are enclosed, which we ask that you file with the motion. Copies have been served on all parties. I apologize for any inconvenience this oversight has caused.

Sincerely yours,

Janis Sue Richardson
Janis Sue Richardson
Associate Public Counsel

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU Enc.
- CTR cc: All parties of record
- EAG _____
- LEG 1 w/m
- LIN 6
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
07991 JUL 21 1992
FPSC-RECORDS/REPORTING

CHART A

TOTAL TROUBLE REPORTS - FLORIDA

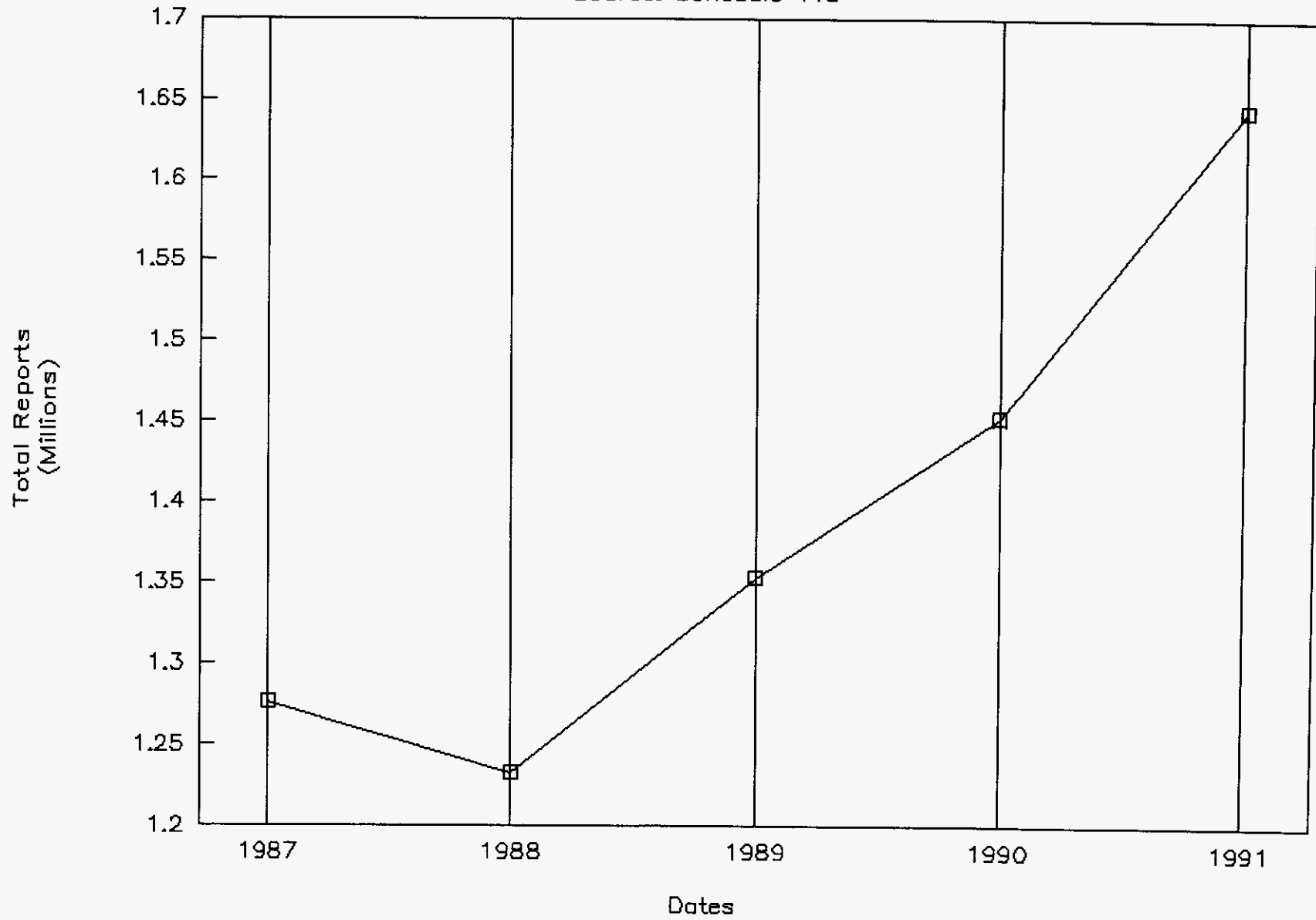
Source: Schedule 11a

	1987	1988	1989	1990	1991
Jan.	113,579	102,933	103,709	114,610	131,981
Feb.	96,604	97,937	88,552	104,880	111,720
Mar.	106,111	105,345	107,347	112,496	125,549
Apr.	97,858	94,100	104,754	112,079	132,356
May	100,168	92,591	109,894	113,841	132,523
Jun.	103,174	103,297	122,791	133,633	146,135
Jul.	119,247	109,465	122,336	136,731	157,929
Aug.	108,363	117,044	131,791	149,120	151,135
Sep.	109,612	111,206	120,142	120,533	135,174
Oct.	111,773	101,807	122,180	131,459	166,431
Nov.	106,536	102,540	107,206	115,554	127,835
Dec.	103,131	94,212	112,392	107,336	124,420
Sum	1,276,156	1,232,477	1,353,094	1,452,272	1,643,188
Ave	106,346	102,706	112,758	121,023	136,932
Total 1987 - 1991 =					4,448,554

DOCUMENT NUMBER-DATE
 07991 JUL 21 1992
 PSC-RECORDS/REPORTING

Total Trouble Reports – Florida

Source: Schedule 11a



TOTAL TROUBLE REPORTS — FLORIDA

Source: Schedule 11a

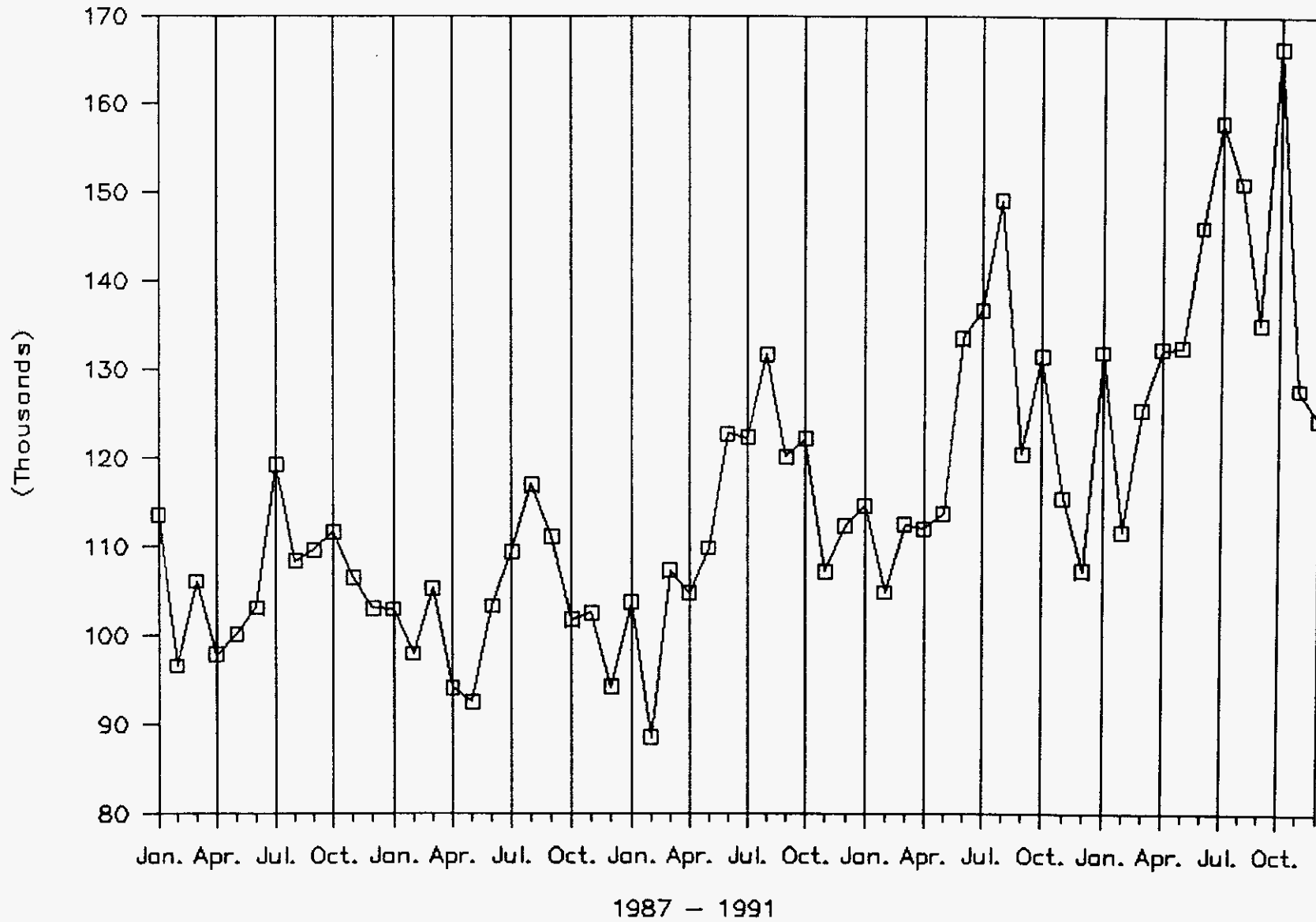


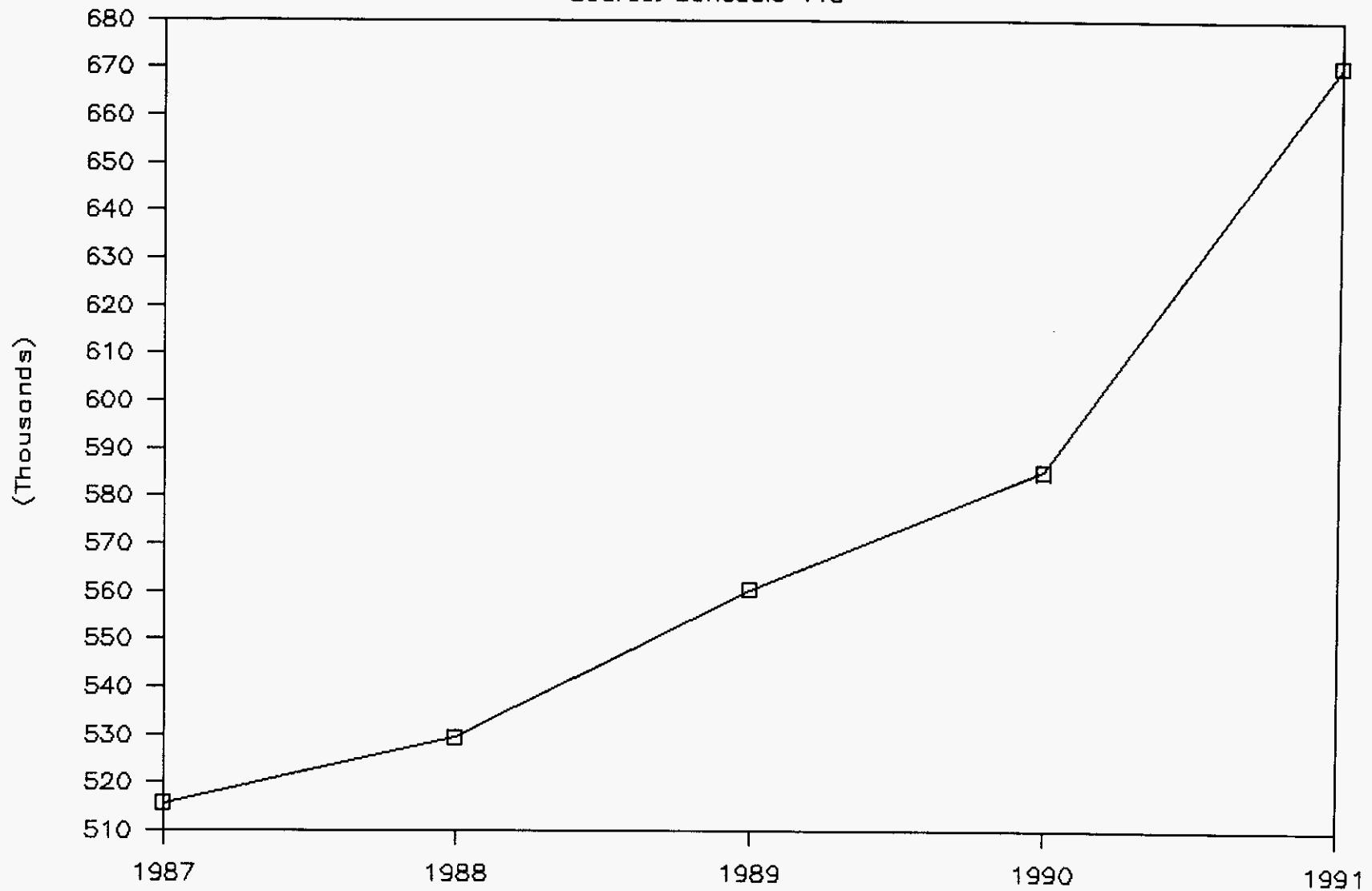
CHART B

TOTAL OOS TROUBLE REPORTS - FLORIDA

	1987	1988	1989	1990	1991
Jan.	41,124	44,918	41,225	45,321	51,227
Feb.	36,436	43,942	36,380	42,433	42,828
Mar.	39,789	46,581	44,723	46,900	48,204
Apr.	35,935	40,458	45,206	47,942	53,108
May	39,171	39,960	45,889	46,079	53,621
Jun.	41,285	45,033	53,087	55,939	62,239
Jul.	50,617	47,806	51,317	56,719	67,818
Aug.	45,255	51,322	54,376	62,556	60,637
Sep.	46,898	46,769	51,080	48,141	55,946
Oct.	47,910	42,267	48,500	50,052	71,557
Nov.	46,685	42,712	42,730	43,604	51,881
Dec.	44,612	37,680	45,821	39,559	51,471
Sum=	515,717	529,448	560,334	585,245	670,537
Ave=	42,976	44,121	46,695	48,770	55,878
			Total 1987 - 1991 =		2,861,281

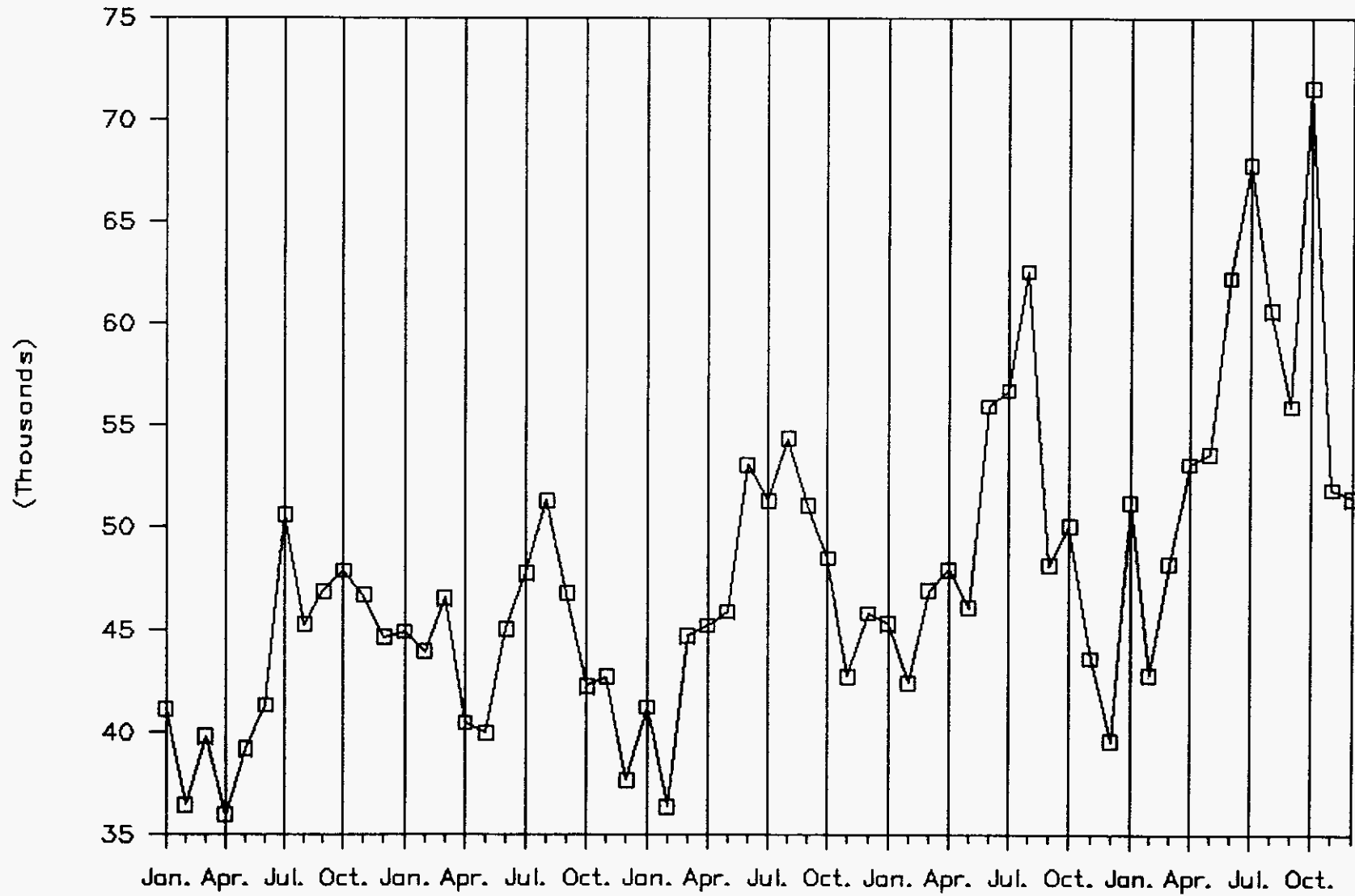
TOTAL OOS TROUBLE REPORTS – FLORIDA

Source: Schedule 11a



TOTAL OOS TROUBLE REPORTS – FLORIDA

Source: Schedule 11a



1987 – 1991

CHART C

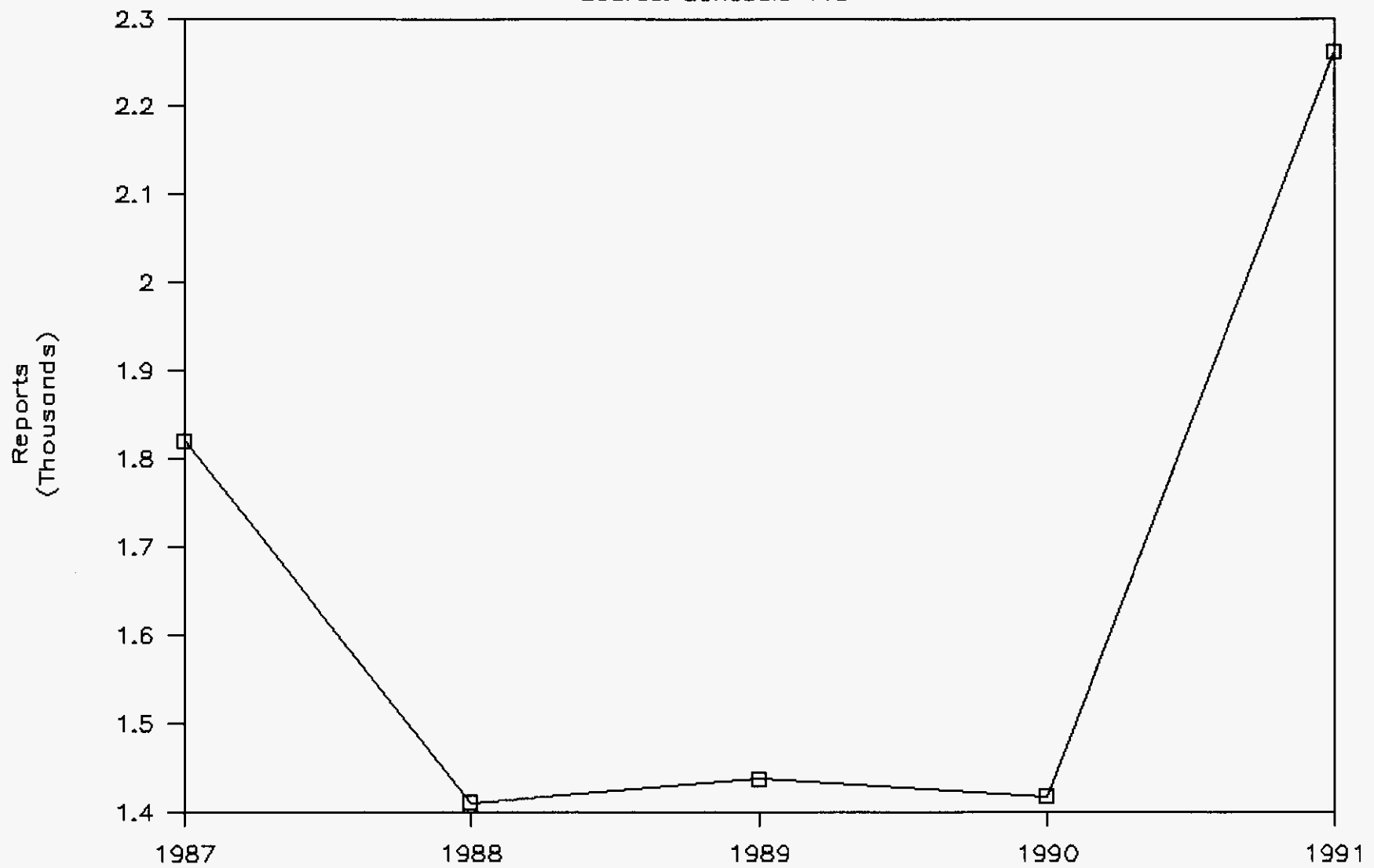
TOTAL OVER 24 HOURS TROUBLE REPORTS - FLORIDA

Source: Schedule 11a

	1987	1988	1989	1990	1991
Jan.	1,452	1,372	733	1,298	1,293
Feb.	878	1,131	513	796	811
Mar.	1,225	955	1,604	917	1,275
Apr.	1,030	884	863	1,036	1,351
May	1,360	898	892	962	1,496
Jun.	1,552	1,432	1,620	1,720	2,662
Jul.	2,461	2,295	1,605	2,601	3,604
Aug.	1,562	2,288	1,851	3,483	2,925
Sep.	1,910	2,962	1,464	1,092	1,904
Oct.	2,087	1,245	2,440	1,364	5,125
Nov.	4,323	842	1,756	893	2,191
Dec.	2,011	631	1,905	853	2,513
Tot=	21,851	16,935	17,246	17,015	27,150
Avg	1,821	1,411	1,437	1,418	2,263
Total 1987 - 1991 =					100,197

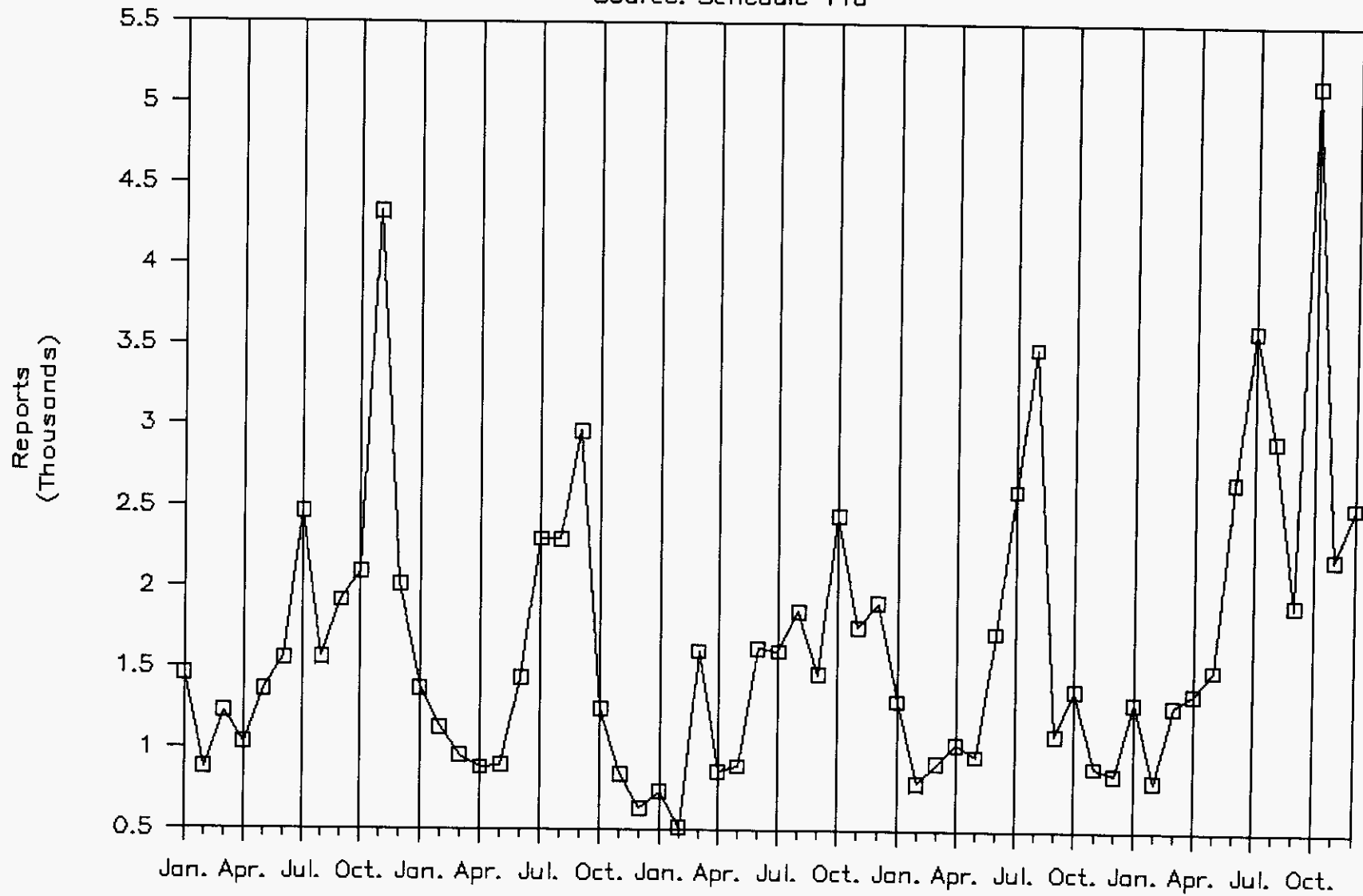
TOTAL OVER 24 HOURS OOS REPORTS

Source: Schedule 11a



TOTAL OVER 24 HOURS OOS REPORTS

Source: Schedule 11a



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

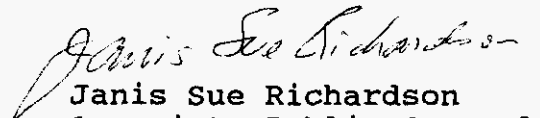
I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following persons on this 21st day of July, 1992.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& Telegraph Co.)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

John Hoag
Department of Legal Affairs
Presidential Circle
4000 Hollywood Blvd., Suite 505-S
Hollywood, FL 33021

Tracy Hatch
Jean Wilson
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

David Wells
Robert J. Winicki
William S. Graessle
Mahoney, Adams & Criser, P.A.
3300 Barnett Center
50 North Laura Street
P.O. Box 4099
Jacksonville, FL 32201


Janis Sue Richardson
Associate Public Counsel