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September 11, 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

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion to Require Sworn Testimony by Southern Bell Sponsoring Its Quality of Service Reports.

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

- ACK
- AFA 3
- APP _____
- CAE _____
- CMU _____
- CTR _____
- EAG _____
- LEG 10/2/92
- LIN 6
- OPO _____
- ROH _____
- SEC 1
- WAS _____
- OTH _____

Enclosure

Sincerely,

Charles J. Beck
Charles J. Beck
Deputy Public Counsel

RECEIVED & FILED

Law
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10479 SEP 11 1992

FPSC-RECORDS/REPORTS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: September 11, 1992
Bell Telephone & Telegraph Company)
_____)

**MOTION TO REQUIRE SWORN TESTIMONY BY SOUTHERN BELL
SPONSORING ITS QUALITY OF SERVICE REPORTS**

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Commission to order Southern Bell Telephone and Telegraph Company ("Southern Bell") to file sworn testimony in this docket sponsoring its quality of service reports submitted to the Commission since January 1, 1988.

1. Order no. 20162 issued October 13, 1988 implemented an incentive regulation plan for Southern Bell. The Commission adopted many of the incentives that had been proposed by Southern Bell in petitions it filed on January 13, 1988.

2. A number of parties expressed concern that providing Southern Bell additional incentives to maximize profits might affect quality of service. The Commission addressed this by stating:

"There is a concern that the company might improve earnings over the short run by letting quality of service slip. In order to discourage and detect such actions, our staff will continue its ongoing review of service quality as required by Commission rules and

will consider more expanded service audits if any significant slippage in quality is detected. The Commission will be notified if service quality significantly deteriorates during the course of this plan, or if Commission rules concerning service standards are violated. The Commission may then consider imposing a penalty on Southern Bell." Order 20162 at page 26.

3. Commission rule 25-4.0185 requires Southern Bell to file quarterly reports with this Commission showing whether it is complying with other Commission rules governing quality of service. These reports include schedule 11 of form PSC/CMU 28, showing the extent to which the company is complying with Commission quality of service standards.

4. On July 21, 1992, the Citizens filed a motion to impose a penalty on Southern Bell for filing and failing to correct false information submitted to the Commission in those reports. Southern Bell opposed the motion, and no action has yet been taken by the Commission.


5. Now, Southern Bell is before the Commission in a rate case proposing even further loosening of regulation. In rate cases companies routinely sponsor their quality of service reports with sworn testimony, but such testimony is conspicuously absent from the case filed by Southern Bell. Quality of service may be even more important in this case than in others because

this case holds the first opportunity for the Commission to review the effect of incentive regulation on quality of service.

WHEREFORE, the Citizens respectfully request the Commission to order Southern Bell to file sworn testimony in this docket sponsoring its quality of service reports submitted to the Commission since January 1, 1988.

Respectfully submitted,

Jack Shreve
Public Counsel


Charles J. Beck
Deputy Public Counsel

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Attorneys for the Citizens of
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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 11th day of September, 1992.

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