

1 SOUTHERN BELL TELEGRAPH AND TELEPHONE COMPANY
2 TESTIMONY OF A. WAYNE TUBAUGH
3 BEFORE THE
4 FLORIDA PUBLIC SERVICE COMMISSION
5 IN
6 DOCKET NOS. 900960-TL, 910163-TL,
7 910727-TL AND 920260-TL
8 FEBRUARY 15, 1993

9
10

11 Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS
12 ADDRESS.

13

14 A. MY NAME IS WAYNE TUBAUGH. I AM EMPLOYED BY
15 BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A SOUTHERN
16 BELL TELEPHONE AND TELEGRAPH COMPANY ("SBT" OR "THE
17 COMPANY"). MY BUSINESS ADDRESS IS SUITE 400, 150
18 SOUTH MONROE STREET, TALLAHASSEE, FLORIDA 32301.

19

20 Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND
21 AND EXPERIENCE.

22

23 A. I WAS GRADUATED FROM FLORIDA STATE UNIVERSITY WITH
24 A BACHELOR OF SCIENCE DEGREE IN FINANCE AND
25 MANAGEMENT IN 1973.

1
2 I BEGAN MY CAREER WITH SOUTHERN BELL IN JULY OF
3 1973 IN FLORIDA, WHERE I HELD ASSIGNMENTS IN THE
4 NETWORK AND PERSONNEL DEPARTMENTS. IN 1983 I
5 ASSUMED RESPONSIBILITY IN SOUTHERN BELL'S
6 HEADQUARTERS RATES AND TARIFFS DEPARTMENT FOR
7 ACCESS TARIFF AND REGULATORY MATTERS. IN THAT
8 CAPACITY, I TESTIFIED BEFORE THE SOUTH CAROLINA
9 PUBLIC SERVICE COMMISSION ON SEVERAL OCCASIONS
10 CONCERNING ACCESS SERVICE AND COMPENSATION RELATED
11 CASES.

12
13 IN 1987 I RETURNED TO THE FLORIDA NETWORK
14 DEPARTMENT WITH RESPONSIBILITIES FOR INSTALLATION
15 AND MAINTENANCE ACTIVITIES IN THE GAINESVILLE,
16 FLORIDA DISTRICT. IN APRIL OF 1989, I ASSUMED MY
17 CURRENT POSITION.

18

19 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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21 THE PURPOSE OF MY TESTIMONY IS TO PROVIDE THE
22 COMPANY'S POSITION REGARDING ISSUES 4, 11 AND 13 IN
23 CONSOLIDATED DOCKETS NOS. 910163-TL AND 910727-TL.

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25 Q. SHOULD THE COMPANY BE PROSPECTIVELY REQUIRED TO

1 REBATE TROUBLES THAT ARE OUT-OF-SERVICE OVER 24
2 HOURS BY ROUNDING UP EACH PRO RATA PORTION OF A 24
3 HOUR PERIOD TO EQUAL ONE FULL DAY?

4
5 A. NO. SOUTHERN BELL HAS ALWAYS DETERMINED WHETHER A
6 CUSTOMER IS DUE A REBATE FOR A SERVICE OUTAGE BASED
7 ON THE NUMBER OF CALENDAR DAYS THAT THE SERVICE WAS
8 INTERRUPTED. SOUTHERN BELL BELIEVES THAT ITS
9 METHODOLOGY IS PROPER. IF, HOWEVER, THE COMMISSION
10 BELIEVES THAT IT SHOULD REVIEW THE MANNER IN WHICH
11 SOUTHERN BELL SHOULD BE REQUIRED PROSPECTIVELY TO
12 COMPLY WITH THIS RULE, I BELIEVE THAT THE PROPER
13 FORUM WOULD BE A WORKSHOP. THIS WOULD ALLOW ALL
14 LOCAL EXCHANGE COMPANIES POTENTIALLY AFFECTED BY
15 THIS ISSUE TO PARTICIPATE.

16
17 Q. SHOULD THE COMMISSION MODIFY THE COMPANY'S
18 REPORTING REQUIREMENTS, DOCUMENT RETENTION POLICY
19 OR MAKE ANY OTHER CHARGES?

20
21 A. NO. THE CURRENT COMMISSION RULES AND REGULATIONS
22 CONCERNING RECORD RETENTION AND REPORTING HAS
23 WORKED WELL, FOR BOTH THE PUBLIC SERVICE COMMISSION
24 AND ALL LOCAL EXCHANGE COMPANIES IN FLORIDA AND
25 SHOULD NOT BE CHANGED FOR SBT OR ANY OTHER LOCAL

1 EXCHANGE COMPANY. NEITHER THE COMPANY'S REPORTING
2 REQUIREMENTS NOR DOCUMENT RETENTION POLICY GAVE
3 RISE TO ANY DIFFICULTIES IN THE TROUBLE REPORTING
4 PROCESS. ANY PROBLEMS WERE THE RESULT OF A FEW
5 EMPLOYEES WHO SEIZED UPON AN OPPORTUNITY TO VIOLATE
6 COMPANY POLICIES. THE COMPANY DISCOVERED THE
7 VIOLATIONS OF POLICY AND TOOK THE CORRECT
8 DISCIPLINARY ACTION. CHANGING REPORTING PROCEDURES
9 OR DOCUMENT RETENTION REQUIREMENTS WOULD NOT HAVE
10 PREVENTED THESE ACTIONS. IN ADDITION, TO MY
11 KNOWLEDGE, NEITHER THIS COMMISSION NOR ANY PARTY TO
12 THESE PROCEEDINGS HAS BEEN PREJUDICED BY A FAILURE
13 TO OBTAIN PERTINENT DOCUMENTS. THE CURRENT
14 COMMISSION REQUIREMENTS HAVE WORKED WELL IN THE
15 PAST AND ARE APPROPRIATE FOR THE FUTURE.

16

17 Q. ARE THE QUARTERLY QUALITY OF SERVICE REPORTS FILED
18 BY SOUTHERN BELL WITH THIS COMMISSION CORRECT?

19

20 A. YES, BASED ON THE INFORMATION AVAILABLE AT THE TIME
21 THE FILINGS ARE MADE. IN MY POSITION AS MANAGER,
22 NETWORK/PSC LIAISON, I AM RESPONSIBLE FOR THE
23 FILING WITH THIS COMMISSION OF ALL QUARTERLY
24 QUALITY OF SERVICE REPORTS. THESE REPORTS ARE
25 PREPARED BY EXTRACTING INFORMATION FROM VARIOUS

1 DATA BASES MAINTAINED BY THE COMPANY. THE
2 INFORMATION CONTAINED IN THESE DATA BASES IS INPUT
3 ON A LOCAL LEVEL AND THEN COMPILED AND SUMMARIZED
4 ON A STATE LEVEL BY OUR STAFF. THE SUMMARIZED DATA
5 ARE THEN ENTERED ON THE COMPANY'S QUARTERLY QUALITY
6 OF SERVICE REPORT SCHEDULES. THESE ARE THE
7 SCHEDULES THAT ARE FILED WITH THE COMMISSION.

8
9 I DO NOT PERSONALLY INPUT AND COMPILE THE DATA, SO
10 I CONTACTED EACH OF THE PERSONS RESPONSIBLE FOR
11 THESE DATA DEVELOPMENT PROCESSES IN EACH LOCATION
12 THROUGHOUT THE STATE. I ASKED EACH OF THEM
13 WHETHER THEY UNDERSTOOD THE PROCESS, WHETHER THE
14 INFORMATION INPUT AND COMPILED WAS ACCURATE AND
15 CORRECT TO THE BEST OF THEIR KNOWLEDGE, AND, IF
16 THEY WERE TO DISCOVER AN ERROR IN THE DATA THAT
17 AFFECTED THE REPORT, WHETHER THEY WOULD CONTACT THE
18 COMPANY'S FLORIDA STAFF FOR THE PURPOSE OF
19 CORRECTING THE REPORT. EACH OF THOSE PERSONS
20 ASSURED ME THAT THEY DID UNDERSTAND THE PROCESS,
21 THAT THE DATA PROVIDED WERE CORRECT AND THAT THEY
22 WOULD INFORM THE FLORIDA STAFF OF ANY ERRORS THAT
23 WOULD HAVE AFFECTED THE REPORTS.

24
25 BASED ON THESE REPRESENTATIONS, IT IS MY BELIEF

1 THAT, WITH THREE EXCEPTIONS, ALL QUARTERLY QUALITY
2 OF SERVICE REPORTS FILED BY SOUTHERN BELL WITH THIS
3 COMMISSION HAVE BEEN ACCURATE. THE THREE
4 EXCEPTIONS ARE THE SCHEDULE 11 REPORTS FOR NORTH
5 DADE IN AUGUST OF 1990; FOR GAINESVILLE IN OCTOBER
6 OF 1990; AND FOR MIAMI IN THE SECOND QUARTER OF
7 1992. THE FACT THAT ERRORS WERE CONTAINED IN EACH
8 OF THESE THREE REPORTS, AS WELL AS THE CORRECTED
9 DATA, HAVE BEEN DISCLOSED TO THIS COMMISSION.

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11 Q. SHOULD THE COMMISSION IMPOSE ANY SANCTIONS AGAINST
12 SOUTHERN BELL FOR INACCURATELY REPORTING SCHEDULE
13 11 PERFORMANCE FOR THESE THREE EXCHANGES?

14

15 A. NO. ONCE ERRORS WERE DISCOVERED IN SOME OF THE
16 SCHEDULES, SOUTHERN BELL PROMPTLY SOUGHT TO
17 DETERMINE THE CORRECT INFORMATION FOR THE AFFECTED
18 EXCHANGES. SOUTHERN BELL HAS NOT TRIED TO KEEP
19 THIS INFORMATION FROM THE COMMISSION.

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21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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23 A. YES.

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