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July 1, 1993

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' 6th Motion to Compel.

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

Sincerely,

*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

Enclosure

ACR  
ATA  
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DOCUMENT NUMBER-DATE

07075 JUL-18

1130-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the )  
Revenue Requirements and Rate )  
Stabilization Plan of Southern )  
Bell Telephone & Telegraph Company )  
\_\_\_\_\_ )

Docket No. 920260-TL  
Filed: July 1, 1993

CITIZENS' SIXTH MOTION TO COMPEL

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Commission to order BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone & Telegraph Company ("Southern Bell") to answer the Citizens' interrogatory number 586.

1. The Citizens served our twenty-sixth set of interrogatories to Southern Bell on April 23, 1993. Southern Bell filed their response and objections on May 28, 1993.

2. Interrogatory number 587, included in the twenty-sixth set of interrogatories, requested the following:

" 587. Please state the number of service representatives or other employees with similar titles and responsibilities who have been terminated and the number disciplined, stated separately, by the company in Florida for falsification of sales for each year starting in 1985 to date."

Southern Bell's response showed the following:

| YEAR | # TERMINATIONS | # OTHER DISCIPLINE |
|------|----------------|--------------------|
| 1985 |                | 3                  |
| 1986 |                | 1                  |
| 1987 | 1              |                    |
| 1988 |                | 2                  |
| 1989 |                | 11 *               |
| 1990 | 1              | 6 *                |
| 1991 | 2 *            | 7                  |
| 1992 | 4              | 14 *               |
| 1993 | 5              | 5                  |

\* Due to progressive discipline, 3 employees appear above 2 times each.

3. Interrogatory number 586, also included in the twenty-sixth set of interrogatories, requested the same information as interrogatory 587, except for the company as a whole -- not just Florida. The Citizens interrogatory was as follows:

" 586. Please state the number of service representatives or other employees with similar titles and responsibilities who have been terminated and the number disciplined, stated separately, by the company (BellSouth Telecommunications, Inc.) in its entirety for falsification of sales for each year starting in 1985 to date."

Southern Bell's response was:

"Southern Bell objects to interrogatory number 586 on the basis that it is overly broad and burdensome and calls for information which is neither relevant to nor reasonably calculated to lead to relevant information related to the issues contained in this docket."

4. The thrust of Southern Bell's objection appears to be that Southern Bell does not want the Citizens to compare falsification of its sales in Florida to falsification of its sales company-wide. The comparison, however, is relevant in evaluating Southern Bell's experience in Florida with falsification of sales

5. The level of falsification of sales in the business office operations of the Company may be significantly different in Florida than in other similar operations of the Company. In its answer to Interrogatory No. 587 the company provided data which

reveals a sharp increase in the number of terminations and discipline for sales abuse during the 1989-1993 time frame in Florida.

6. Related experience of the company in other states during the same time period is unquestionably relevant and germane to the issues in this docket. This docket includes issues relating to quality of service (which includes sales) and the conduct of the company during the incentive regulation trial period. The comparison of the Company's overall experience in the area of sales fraud and abuse is germane and relevant to the Company's performance in Florida alone.

7. For example, by the Company's answer to interrogatory 587 we know that discipline has risen sharply under incentive regulation for falsification of sales. It is important for the Commission to also know the experience of other states where BellSouth operates under regulatory plans which have not included Incentive Regulation.

8. Further, the significant rise in disciplinary action due to sales falsifications in Florida should be a legitimate area of inquiry by the upper management of BellSouth. Terminations have risen in Florida over 600 per cent in the 1988-1993 time period compared to 1985-1987 because of falsification of sales. Other discipline for sales falsifications has risen by 750% during the

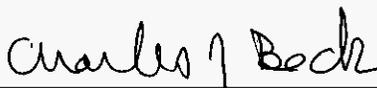
same time period in Florida. Faced with these factors in Florida, it is inconceivable that BellSouth has not already questioned whether the experiences in Florida are consistent throughout the Company.

9. Interrogatory 586 is therefore not only a legitimate request for comparative data intended to further our knowledge of the sales environment in Florida, but it is also the kind of information the Company would logically need to manage its business.

WHEREFORE, the Citizens request the Commission to order BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone & Telegraph Company ("Southern Bell") to answer the Citizens' interrogatory number 586.

Respectfully submitted,

JACK SHREVE  
Public Counsel



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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 1st day of July, 1993.

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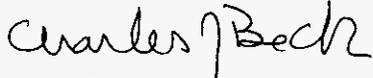
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