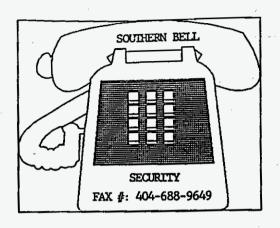
EMPLOYEE REPORTING LINE

INCIDENT REPORT

	DATE 1-4-91 TIME 8:03 A.M. RECEIVED BY Clark Stone		٠	
5.	FULL NAME OF PERSON MAKING REPORT			
	JOB TITLE Services Technician			
	DEPARTMENT Network			
8	LOCATION_			
. 9	CONTACT NUMBER			
	NATURE OF CALL Believes someone changed or falsified			
	four time sheets he submitted in 12/21/90. He			
	submitted 4 HO days; they were changed to			
13	N days. also believes the measurement			
	plan should be investigated because of false			
	reporting to influence the Company position with			
	the PSC.			
	Redacted			
	SUBJECT INFORMATIC FULL NAME (S) DEPARTMENT			
	FULL NAME (S)			
	DEPARTMENT -			
	LOCATION	AIL	25	3 <u>x</u>
	PHONE NUMBER	בא-נ	3 ∧	FPOR
24	SUPERVISOR	MUMBEK-UA	11976 NOV-5#	DS/R
25	HOW DID COMPLAINAN - ACQUIRE INTORMATION:		97	ปกา
~		DOCUMENT		SC~R
	· · · · · · · · · · · · · · · · · · ·	00		<u>ال</u>
	REFERRED TO North Florida Secunt AREA North Florida			
	REFERRED TO North Florida Securit AREA North Florida DATE 1-4-91 TIME 8:30 Am F03B36Z 0	เดอกกร	54	
	Theme attacked now ilidas	J J J J J	-	



FACSIMILE HEADQUARTERS/SU38 SBC

DATE:	Jan. 4, 1991
	Jin Teffries
	00
FROM:	Clark Stone
,	<i>(</i>
	PAGES INCLUDING COVER SHEET:

CALL 529-5527 IF ALL PAGES ARE NOT RECEIVED OR IF MESSAGE IS ILLEGIBLE

January 4, 1991 ASN 01-008

L. L. Schoolar Vice President & Comptroller 4503 Southern Bell Center Atlanta, GA

7 Re: Complainant Employee Reporting Line Incident Report 91-001

File: 420.080001

Dear Mr. Schoolar:

12 On January 4, 1991 a Services Technician in contacted the Headquarters Security office via the Employee Reporting Line and supplied the following information.

On December 21, 1990 be submitted four time sheets, which reflected four HO days believes someone changed or falsified the time sheets by changing the 4 HO days to N days. also believes the measurement plan should be investigated because of false reporting to influence the Company's position with the Public Service Commission.

The complaint was discussed with Jim Jeffries, Security Manager in Jacksonville, and a copy of the Incident Report was faxed to that office. The results of the investigation conducted in Florida will be supplied to you as soon as possible.

Yours very truly,

ZFS/fgn

F03B36Z 0000066

We mailed due to timing...

JLS

TRANSMISSION REPORT

TTI NO. DATE AND TIME

DURATION

MODE

PAGE

CODE

10043506411

91. 64. 91 09:34 AM

01:48

 a_{α}

Sec. 1.

January 14. 1991

RE:

SERVICES TECHNICIAN EMPLOYEE DEFALCATION CASE #: FN003-05012

Operations Manager

Dear Ms. Kahle:

8

on January 4, 1991, Services Technician, complained to Staff Manager-Security Clark Stone, Atlanta, Georgia, via the Employee Reporting Line (1-800-543-3529), that someone had changed or falsified four time sheets he submitted on December 21, 1991 submitted time sheets for 12-24, 12-26, 12-27 and 12-28, 1990, showing HO for all four days. The time sheets were subsequently changed to N (no show) and Chapman was not paid for the days in question.

During an interview of Manager-I&M on 20 December 9, 1991, it was learned that was scheduled to work his pre-selected HO days and he failed to come to work and did not 22 call in; therefore, on the advise of Labor Relations Manager Nell Campbell, changed time to N and he was not paid.

Since there is a grievance procedure in place for employees, and in fact, a grievance has already been filed with the Union in this matter, Security is terminating its investigation into this matter.

- also alleged in his complaint that the measurement plan was being falsely reported to influence the Company's position with the Public Service Commission (PSC).
- During an interview of January 8, 1991, explained that his complaint is in regard to the out of service over 24 hours objective. He stated that when a trouble is closed out and the objective is missed by a few minutes, the technician is encouraged to back the clearing time up to a time prior to the commitment.

- Services Technician was also interviewed on January 8, 1991, and he made the same allegation as Both employees stated that if they show a different clearing time than the closing time, management harasses them about what they were doing between the time they cleared the trouble and the time they closed the trouble.
- Neither nor would say that they have ever been asked or instructed by a Manager to cheat or falsify a report.
- provided copies of the DLETH (Customer Trouble History Report) which shows the clearing time the same as the closing time. He stated that the technicians use a hand held computer terminal to receive and close out their trouble. When they close out their trouble, they can only input one date and time of day. They are supposed to input the actual time service was restored to the customer because the computer automatically input their completion time when they close out.
- stated that no one is being asked to cheat. They are being asked to do the job correctly. He stated that if all the technicians would close their trouble out the correct way, the PSC objective would take care of itself. I stated that it is impossible to clear a trouble and close it out at the same time and when he sees the time the same and the out of service objective has been missed by a few minutes, he sends the report to the technician's supervisor and requests the employee be covered again on the proper way to close a trouble.
- Information gained during interviews with Assistant 27 Manager: and 1 on January 9, 1991, 28 reinforced statement.
- Since no information has been revealed which would 30 support allegation, this file is being closed on January 14, 1991.

If you have any questions, please contact me or Staff Manager-Security Nelson Thornton at 407-237-3349.

Yours very truly,

General Security Manager North Florida Area

NCT:pw

CC: Mr. J. L. Schmidt
Assistant Vice-President-Security

EMPLOYEE REPORTING LINE

INCIDENT REPORT

JOB TITLE Account Frecutive DEPARTMENT Marketing (North District Off	(ce)
• · · · · · · · · · · · · · · · · · · ·	: ce)
DEPARTMENT Marketing (North District OCC	(ce)
- CTI G DT I	
& LOCATION E	
9 CONTACT NUMBER	
10 NATURE OF CALL an Account Executive in the	le caller's
group, is calling business customers and making bogus sale	
to approximately 40-50 enstoners per month, while the other per	ole in the
13 group average 2-3 sales per month. The sales pitc	
government has authorized me to reduce your monthly South	
distance bill by X-amount of dollars, by using WATSaver . Al	I I need is
your approval," Naturally, when the customer hears a deal the	at sounds
this good, no questions are asked. WATService is a service	
offers its business customers. (See next	
SUBJECT INFORMATION:	
20 full name(s)	
DEPARTMENT Marketing	
22 location	
PHONE NUMBER	
24supervisor_	
HOW DID COMPLAINANT ACQUIRE INFORMATION? Personal obs	ervation
* —————————————————————————————————————	
REFERRED TO Del Castellanous AREA South Flor	ida
DATE 3/28/91 TIME 3:30 P.M.	F03B36Z 0000070

Incident Report 91-16 continued.

On numerous occasions the above situation 3 has been brought to the attention of Supervisor of that group, by the other 5 concerned employees in the group. I has told them to mind their own business, and has literally turned a deaf ear to the entire 8 problem. also told the Anonymous caller that he could be said for slander by if he was thinking of reporting, this incident.

☐ South Central Bell Southern Bell Investigative Report □ BellSouth Services ☐ Other: _cate of Origin: Florida investigation At: Date: Reporting Office: South Florida Miami, Florida 06/12/91 Classification: Title: PERSONNEL INVESTIGATION Reporting Manager: Steno: jł. Period Covered By Investigation: 03/28/91 thru 06/12/91 Symposis: This investigation was predicated upon an anonymous are nortator the Reporting Line alleging was using an unethical sales presentation to customers in the sale of WATS Saver service. The caller stated this had been brought to the attention of supervisor, by concerned employees in the group. The caller states Whas told the anonymous caller that he could be sued for slander by e was thinking of reporting this incident. fif e was thinking of reporting this incident. Eight members of were interviewed by Staff Manager-Security D. H. Fleming providing signed using terms such as "The Federal Government, 7statements they had heard the Public Service Commission or the Government has authorized Southern Bell to lower their rates", usually by \$40.00 per month and the customers were not informed they were purchasing the WATS Saver billing plan. The original 3/ anonymous caller stated after finding out a Security investigation was being conducted, accused him of making the call to the Employee Reporting Line. After admitting to he made the call, he felt so threatened he #called the Employee Reporting Line again to request protection.

Sinformed that two members of the group had come to her questioning the
integrity of his WATS Saver sales. (confronted each member of her
ygroup, with the exception of questioning them or informing them a 7group, with the exception of questi security investigation was being conducted. Security investigation was being conducted. During the investigation, two employees received Cease and Desist letters, threatening them with (cont'd) investigating Manager: Staff Manager-Security Security Manage F03B36Z 0000072 Copies To: NOT TO BECOME PART OF EMPLOYEE'S PERSONNEL FILE or July 19, 1991, DH Flemmen WAS INFORMED By President-Florida Director-Security A.V.P.-Security A.V.P.-Personnel Services General Attorney General Manager-Business Marketing Jeneral Manager-Personnel Regional Sales Manager-Business Marketing That i Weeks from July 19, 1991 Through August, 1991 on Itely 30 1991 D#Flemmy was Informed By Marketing 5Operations Manager-Personnel 774 WAS SUSPUNDED FOR 10-5012 OKE Week "Restricted BellSouth Security File No:

gile W/ ERL Report Book

April 3, 1991 ASN 04-003

MEMO TO:

Don Fleming

FROM: Judy Harris

⟨ RE

Subject Employee Reporting Line 91-16

On 4-3-91, the original caller of the Emergency Reporting Line case recontacted the Headquarters Security office. The caller stated it his name was the gave no last name.

12 The caller stated his supervisor, contacted him by beeper at a customer's premise on 4-2-91 and requested to seem him in her office immediately. When he returned to her office, she began to question him about calling Security on the "800" number. At that time she told him he should be real careful because he could be sued for slander. He admitted to her that he had, in fact, made the call to the Emergency Reporting Line. told him then that "this was going to be a blood bath and if she went down she was going to take everyone with her."

The caller was concerned about what she might do to him and what protection he could get from Security. He wanted us to know that she had threatened him.

I explained to him that Security only gathers the facts and does not control disciplinary actions of the departments. I told him I would refer this information to the person in charge of the investigation.

If you have any questions, I may be reached at 404-529-8453.

cc: Clark Stone

Southern Bell

Southern Bell Center Room SU38 675 West Peachtree Street, N.E. Atlanta, GA 30375 404 529-5527

April 3, 1991 ASN 04-003

MEMO TO:

Don Fleming

FROM: Judy Harris

φ RE:

Subject

Employee Reporting Line

91-16

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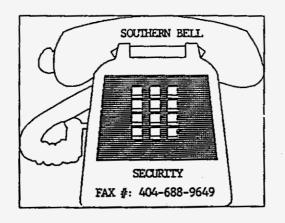
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cc: Clark Stone



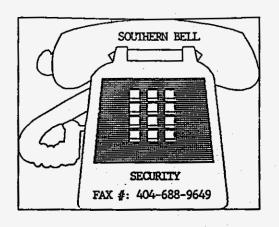
FACSIMILE HEADQUARTERS/SU38 SBC

DATE:	4/3/91
TO:	Don Fleming
	1 -1 -Haic
FROM:	Judy Harris
	# PAGES INCLUDING COVER SHEET: 2

CALL 529-5527 IF ALL PAGES ARE NOT RECEIVED OR IF MESSAGE IS ILLEGIBLE

EMPLOYEE REPORTING LINE

INCIDENT REPORT DATE April 15,199/TIME 2:03 P.M. RECEIVED BY Clark Stone FULL NAME OF PERSON MAKING REPORT ANONYMOUS MALE JOB TITLE _ DEPARTMENT ~ LOCATION___ CONTACT NUMBER _ NATURE OF CALL reported that The car 12 SUBJECT INFORMATION: FULL NAME (S) DEPARTMENT LOCATION PHONE NUMBER ___ SUPERVISOR HOW DID COMPLAINANT ACQUIRE INFORMATION? Undnown REFERRED TO Jim Jeffries AREA North Florida F03B36Z 0000076



FACSIMILE HEADQUARTERS/SU38 SBC

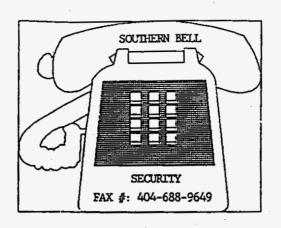
DATE:	4-15-91
TO:	Jim Jeffries
FROM:	Clark Stone
#	PAGES INCLUDING COVER SHEET:

CALL 529-5527 IF ALL PAGES ARE NOT RECEIVED OR IF MESSAGE IS ILLEGIBLE

EMPLOYEE REPORTING LINE

INCIDENT REPORT

	DATE May 15, 1991 TIME 10:40 A.M. RECEIVED BY GARK Stone
	FULL NAME OF PERSON MAKING REPORT Anonymous male.
	JOB TITLE
	DEPARTMENT
-	LOCATION
	CONTACT NUMBER
	NATURE OF CALL <u>Caller inquired about status 17</u>
-	investigation he referred on April 15, 1991. Caller
	Stated he did not want to supply specific names
	and did not want to get anyone fixed. He is
	concerned that the cable repair group and station
	repair group have abused overtime And home
	dispatch for a long long time, and it needs
	to be Stopped- Caller was referring to
18	situation in
	SUBJECT INFORMATION:
	FULL NAME (S)
	DEPARTMENT
	LOCATION
	PHONE NUMBER
	SUPERVISOR
	HOW DID COMPLAINANT ACQUIRE INFORMATION? Unknown
4.	
	REFERRED TO AREA North Florida_
	DATE
	F03B36Z 00000



FACSIMILE HEADQUARTERS/SU38 SBC

DATE:	May 15, 1991 North Florida Office
FROM:	Clark Stone
#	PAGES INCLUDING COVER SHEET:

CALL 529-5527 IF ALL PAGES ARE NOT RECEIVED OR IF MESSAGE IS ILLEGIBLE

Julia B. North
Vice President
Customer Services

July 16, 1993

4515 Southern Bell Center 675 West Peachtree Street, N.E. Atlanta, Georgia 30375 404 529-6183

Mr. Robert W. O'Neill Suite 2005 Campanile Bldg. 1155 Peachtree St. N.E. Atlanta, GA 30367-6000

SUBJECT: Restoration of Service Following Temporary Suspension

Dear Mr. O'Neill:

This is in response to your letter dated June 21, 1993 regarding restoration of service following temporary suspension.

After investigating the conditions on which an order to restore service following a temporary suspension is coded CF or PF, we believe the customer is entitled to an adjustment to his/her bill since he/she is being billed a discounted charge while the service is in the suspend status. The adjustment should be at the discounted rate for the period we were not able to provide telephone service.

Because the service order does not get closed out to a trouble report in repair, an adjustment is not given automatically. A process needs to be established by which the Business Office is notified when the service order is completed. Once we are notified we can make the appropriate adjustment.

We will proceed with this request by obtaining Pricing/Regulatory and Legal's concurrence with our recommendation. A conference call is scheduled for Friday, July 16, 1993 to begin this process. Plans will also be developed to coordinate with Network the best method for notifying the Business Office of situations where the service could not be restored on the date requested by the customer.

If you need additional information, please let me know.

Sincerely,

Judi North

Vice President - Customer Service



7/9/93 Call to Lioyd Namit - gues ne this providure no Fla tarffe / action of

Tempo Susp

(1) Phi d to translatering to protone account | USUALLY ALL THAT'S REQ D SINGS
(6) only to till - while of free of translate | FA : 5 # ARE RESERVED

(3) If line trouble detected, remove from automatic rompline or Ald to find la 2 Code "CF" until facilitées repaired

Restoral se a Lere. Order NOT refree processed as transition of

Rebates must be handled <u>manually</u> by such and gf NOT COV'D BY FSC RULES



C. J. Sanders
Vice President-Network Operations/South

PRIVATE & CONFIDENTIAL

June 25, 1993 File Code: 420.0800 20th Floor Southern Bell Tower 301 W. Bay Street Jacksonville, Florida 32202 (904) 350-2424

Mr. Robert W. O'Neill Suite 2005 Campanile Bldg. 1155 Peachtree St. N. E. Atlanta, Ga 30367-6000

Dear Mr. O'Neill,

SUBJECT: Ombudsman Complaint - Restoration of Service Following

Temporary Suspension

This is in response to your letter dated June 21, 1993 regarding captioned subject.

When an order is issued to restore a service that is on temporary suspension, it follows the normal service order flow through network. Temporary suspensions are routed to translations to restore the service and then subjected to test to determine that the customer's service is working and free of trouble. This is usually all that is required to restore a temporary suspension since the facilities and telephone number is reserved for that customer. If line trouble is detected, the order is removed from automatic completion and routed to field forces for clearance.

In the instance described in this complaint, when the facility can not be repaired on the service order due date, it must be coded to a company facility problem CF. It remains in this status until facilities are repaired or replaced and the order is completed.

The reference in this complaint to repair order is not accurate. A restoral is a service order and not a repair order or customer report. Until the service is restored it can not be processed as a trouble report, since it is a non-working service, until the order is completed.

Any rebates that might be appropriate would be handled manually by the customer services group. This issue is not specifically covered by any PSC rule.

The coding and service order processing in this described issue was appropriate. If you need additional information, please let me know.

Sincerely,

Jerry Sanders

. Vice President - Network Operations, South

wp51/ombud

cc: Ted Kellermann



June 21, 1993

TO:

Jerry Sanders

Judi North

FROM:

Bob O'Neill

SUBJECT:

Ombudsman Complaint - Restoration of Service Following

Temporary Suspension

I received an anonymous call from an employee in Florida. The caller's complaint involved the handling of the Service Order for restoring service following a temporary suspension (i.e., for summer) but, when attempting to restore, the cable is not working. I believe that during suspension the customer pays 50% of the local rate for a period and then the full amount.

The problem posed by the caller relates to how the order is coded when the fact that the cable is not working is discovered.

- We do not use issue a repair order, which could trigger a credit if the service is out for over 24 hours.
- We code the order CF or PF (cable facilities not available) and hold it until the facilities are available. During this hold period, the customer continues to pay 50% (or 100%) of the local rate and there is no triggering of credit, even if the hold period exceeds 24 hours.

The caller stated this issue was raised with the local staff and the HQ staff, both of whom opined the procedure used was allowed by the PSC. The caller stated that even if such a practice was "allowed", it was not right.

I would appreciate your having someone investigate this question and providing the results to me. Please coordinate with Legal on the interpretation of PSC rules.

anonymous call for the

Taile - Conserved about how we fandic 5.0. re restoral of service formula tempe surprises (ie lumine, during surpressed rate 50% of mormal rate for period, Hen 100%

Prob - When restore a case ricid & cashe facility w not whig.

Herefore serves not available.

o We do not usur reformación - which would trugger in it is

E orde is hid until cable fac avail Aureng the period,
mo service, ruit pays 50% (ar 100%) of nate & mo service
traggered for out of service

O Caller Daims Local staff & HQ staff said this providere is at fer

· Caller believe - even if allowed, it is not right because customer faying for pero when we are unable to provide service

TO

BELLSOUTH

Robert W. O'Neill

Vice President Corporate Responsibility and Compliance Suite 2005 1155 Peachtree Street, N.E. Atlanta, Georgia 30367-6000 404 249 3850

Ardrea Lewis
Close
Policy Changed

То	ime.) 4:22	
WHILE YO	שכ	WERE	OUT
M	20	Matthe	ms
of			
Phone (205)	48	5-1808	8
Area Code		Number	Extension
TELEPHONED	4	PLEASE CAL	
CALLED TO SEE YOU		WILL CALL	AGAIN
WANTS TO SEE YOU		URGENT	
RETURN	ED YO	UR CALL	
Message			, ,
3/29 12148	L	WIC	
		·	
		 	
		00/	
		Operator	

. EFFICIENCY®

F03B36Z 0000086

#23-000

COMPENSATION BULLETIN No. 93-07

Date:

March 19, 1993

Policy:

WatsSaver Service Downgrade Policy

Effective Date: March 1, 1993

Per Make Mathemat made programmed who was the way a dewry to de way a de wa The WatsSaver Service Downgrade Policy is being revised as follows:

- When a Watssaver Service option is downgraded from a netted option (Levels 7, 8 & 9) to a smaller netted option or to a non-netted option (Levels 1 through 6), full value for the option sold is awarded and full value for the option discontinued is debited. This results in the incremental difference being debited.

- When a WatsSaver Service option is downgraded from a non-netted option to a smaller non-netted option, no compensation revenue will be debited and no compensation credit will be awarded.

Please contact your compensation coordinator, if you have any questions concerning this bulletin.

Called Me Lewis

F03B36Z 0000087

Printed by: INTEROFFICE MEMORANDUM

Date:

19-Mar-1993 05:10pm GMT

From:

John R. Gunter

GUNTER J

Dept:

BSC Corp Resp & Compliance

Tel No:

249-3850

TO: Robert W. O'Neill

(ONEILL R)

9 CC:

/ Subject:

Bob-

called back today (Friday, March 19). She said that the marketing people had recently received a notification that the compensation plan was being changed on downsizing WATS-saver plans. She said she did not know if I had anything to do with that or not, but she wanted me to know it had been changed.

I told her that since it had gotten better, I would take credit for it whether I deserved it or not. I told her I had passed her concern on to Vernon Jobson, without revealing her name, and that Vernon had said he would look into it.

She seemed to be pleased with the change.

John

Printed by: ONEILL R - Robert W. O'Neill INTEROFFICE MEMORANDUM

Date:

15-Mar-1993 05:29pm GMT

From:

John R. Gunter

GUNTER J.

Dept:

BSC Corp Resp & Compliance

Tel No:

249-3850

TO: Remote Addressee

(JOBSON_VC @ Al @ GAMD)

CC:

Robert W. O'Neill

(ONEILL R

'CC:

Subject: Wats Saver Downgrades

Vernon-

In case you did not make a note of my question out at the officer's conference, I wanted to remind you of the question I received from an A.E. in Florida about the compensation penalty they suffer if they downsize a WATS Saver customer from a plan with a more hours to a plan with less hours.

The caller's concern is that if the customers usage indicates that a downgrade is in the customer's best interest, the compensation penalty could deter our employees from doing the right thing.

Since I have passed the baton to Bob O'Neill, please get back to him with your decision on what to do so Bob can get back to the caller.

If you need more details, call Bob or me.

Thanks,

John

NATS Sav - & levels - A options 1+9
Never did net level 1+6 - Revised policy 1-6 - wash - no hit / no comp / no pensety)
- AE (if drangs for 7-9 to 1-6) -

Printed by: INTEROFFICE MEMORANDUM

Date:

10-Mar-1993 11:32am GMT

From:

John R. Gunter

GUNTER J

Dept:

BSC Corp Resp & Complianc

Tel No:

249-3850

TO: Robert W. O'Neill

CC:
CC:
CC:
Comb Call

Bob

As I mentioned to you this morning (3-10-93). I got a

9

38

As I mentioned to you this morning (3-10-93), I got a call from who is an Account Executive in Her telephone number is

Her complaint concerns sales incentive compensation in general and in particular the compensation on WATS Saver service.

According to we offer the service in several hourly bands. She indicated that a customer can buy a two hour plan, a five hour plan, a ten hour plan, etc. The idea is that depending on a customer's calling habits, we would offer the most appropriate plan. Compensation is paid for selling these plans.

Her concern is that when a customer's usage pattern declines so that downgrading to a lower band in appropriate, the difference in the sales commission is netted against the person who initiates the downgrade order.

As I understand it from § a customer could have been sold a five hour plan by the business office because his calling pattern indicated this was good for the customer. Then some time passes and the customer is not calling very much, perhaps because they have had a business reversal. had picked up in her this was an account that module in January, and noticed that the customer's usage no longer required a five hour plan, she has a dilemma. If she does the right thing and changes the customer to a two hour plan, then gets her compensation netted for the difference between a five hour plan and a two hour plan. her view the company is financially punishing her, and thus discouraging her from doing the right thing for the customer. She questions with all of the emphasis we have in Florida on treating customers right, if that is what we want to do.

believes that with all of the things that an account executive has to do, that they will likely push making such a change to the bottom of their stack of things

to do.

If she had been the one to make the initial sale of the five hour plan (and had gotten the incentive pay for doing so) would she think it was fair that she should later have the downgrade netted. She said she thought that would be fairer, although she still said a lot of factors beyond an AE's control can affect small businesses. She said these small businesses are subject to swings that can significantly changes their needs.

She also said that if she were to completely disconnect the WATS Saver service for the hypothetical customer described above, there is no netting. Thus, she says, you could disconnect the five hour plan in March, sell a new two hour plan to the same customer in April and get no netting, plus you would get a new compensation for the April two hour sale. She does not think that should be allowed either, but she says the present situation is open to such manipulation.

/8 I told ' would talk to some of the people familiar with sales compensation to see what I could learn.

Thanks,

John

P.S. be sure that this gets logged and filed as an Ombudsman complaint.

202 311/93 CP April 22, 1993

TO:

Judi North

FROM:

Robert W. O'Neill AWO

SUBJECT: Ethical Question

I received a call concerning an awards program in the (See attached notice). The prize was for the highest "C" and "R" revenue for a day. The bottom of the notice has the following statement:

> Ethical Practices Requires (sic) Attendance by the Winner and a Guest - No Selling or Give Away

It appears to me we are creating an ethical problem where none exists unless there is more to all of this than the attached notice. Such assertion could damage our emphasis on real ethical problems.

Attachment

2

3

4

6

HIGHEST "C" + "R" REVENUE WINS

SUBMIT TOTAL C + R REVENUE
FIGURES TO ANY SALES
COMMITTEE HEMBER BY 230 PM
TODAY - WINNER TO BE ANNOUNCED
BY 3 PM TOPAY!

*ETHICAL PRACTICES REGUIRES FO3B36Z 0000093 ATTENDANCE BY THE WINNER AND A GUEST NO SELLING OR GIVE AWAY

3 4/16/93 350PM raid kno mat in back sie to tack to some that day and sailed nicky top called her -she had left for the day 4/19/93 RWO called FG Not in today

7 4/20/93

Ques re awards pan in residence resuce to in

10

Proje for highest "O" & "R" revenue -1/

> INTE AT BOTTOM OF FLYER "Ethical Practices Paquires attendance By the Winner and a Guest - no Setting or Yeve away " (underline in original)

question - What's unethical about neplew & husband, or 2 meighbars ? my answer - I don't all a problem, as long as we do to curry favor with vendor or supplier. 18 She is to send me cc of flyer

1 5/1/93

252 PM rec'd call Not In

ri Incentiue Coxtest

"Mint wie His - Car't gwe away"

I tell her I had talked to Jadi North

Well check & call her back

5/19/93 Tacked to Judi Nath - agree the restriction no was of techer was wrong Knee-feek reaction of super's who had E'el

(CLOSE FILE

- Type Of Transmission		Priority
Admin.	Normal _	
Facsimile	Urgent _	·
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ATTENDANCE BY THE WINNER AND
A GUEST-NO SELLING OR GIVE AWAY-

July 13, 1993

2. TO:

FROM:

Robert W. O'Neill Au

SUBJECT:

Your Complaint Regarding Network Terminating Wire

You called my office to voice a complaint relative to network terminating wire. Specifically, you expressed concern about needless expenses associated with customer outages caused by the use of substandard network terminating wire. According to your complaint, we accept contractor-installed network terminating wire which is either sub-standard wire or inadequately installed.

The rules under which we must operate place certain restrictions on what we can do or not do. Our policy is to own and maintain the facilities on the company's side of the demarcation point. (See attached memorandum, dated July 13, 1992.) Problems do develop, however, when the builder does not coordinate with BST, does not place conduit, and/or uses non-standard materials or methods. The attached memorandum, RL-91-12-039SV, addresses this situation and how BellSouth will respond. Unfortunately, we can not force a builder/contractor to install conduit nor can we prevent them from placing the network terminating wire. In addition, we can not require the building owner to allow us to prewire and place the network terminating wire.

The FCC, in Docket No. 88-57, determined that the multi-tenant building owner could determine the location of the demarcation point. BellSouth is not required, however, to connect to substandard wire or utilize improper support structures (see pp. 6-7 of memorandum RL-90-08-055SV). This, then, is the point at which the decision must be made whether to accept the contractor-installed network terminating wire or to reject it if it causes harm or it is reasonably believed that such harm is imminent.

I hope this answers the questions you raised which are very valid questions. I appreciate your taking the time to bring this matter to my attention.

FILE CODE: 240.0220

DATE: July 13, 1992 9 (10: GM2) Horres

TO:

Vice Presidents - Network & Technology Grow Vice Presidents - Marketing Group

FROM:

Group President - Network & Technol

Group President - Marketing

SUBJECT:

Cable/Wire and Demarcation Point Policipiesen:-Network/Florida Jacksonville, Florida

Prior to reorganization into BellSouth Telecommunications, Inc., (BST), South Central Bell (SCB) and Southern Bell (SBT) had established policies which served to guide field forces in delivering network services on private property. The purpose of this policy statement is to integrate and unify previous SCB and SBT policies in light of the current marketplace and regulatory environment.

Consistent application of demarcation point and cable/wire policies is of vital importance. These issues directly impact the manner in which our customers receive BST services and, consequently, their perception of how easy it is to do business with BellSouth. It is essential that Network and Marketing forces have a common understanding of the underlying philosophies of BST.

First, it is the policy of BellSouth Telecommunications to locate the demarcation point/Network Interface as close as possible to where the customer desires, subject to applicable federal and state regulations. This is the guiding principle for field forces to follow in those situations where judgement is required.

Secondly, it is BST policy to own and maintain its own transmission media for the delivery of regulated network services. Premises wiring owned by other parties is not to be utilized on the Company's side of the demarcation point. Historically, exceptions to this policy have been made on certain military bases for national security reasons. These or any other exceptions must be approved by the undersigned or a designated officer representative.

Attached are several references and exhibits which provide procedural details relating to demarcation point locations.

In conclusion, it is the goal of BellSouth Telecommunications, Inc. to maintain the highest possible quality of service and network reliability. To this end, it is vitally important that the Company be in total control of the facilities needed to deliver the network to our customers.

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Attraciments:

Group President -

Network & Technold

A. Drummond Houp President -

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F03B36Z 0000099

BELLSOUTH TELECOMMUNICATIONS @

file code: 240.0700

subject: Wiring Multi-Tenant Residential Buildings

type: Information Letter

date: December 16, 1991

distribution list: ND0, ND1, ND2, ND3, ND4, ND5, ND7, NC1, CE1, SO8

related letters: RL: 90-08-055SV

other: None

to: B. G. Almond, Operations Manager - Implementation/GA, MS, LA

D. L. Guillory, Operations Manager - Implementation Support/KY, TN, NC, SC

E. M. Hardwick, Operations Manager - Implementation Support/GA, MS, LA

T. C. Taylor. Operations Manager - ImplementationSupport/AL, FL

B. R. Williams, Operations Manager - OSPE/C - Implementation/AL, FL

entities: BellSouth Telecommunications

from: Operations Manager - I&M/IMC

Operations Manager - OSP Engineering Systems Development

Operations Manager - OSP Engineering Support

description: Provides guidelines for the provision of Network Terminating Wire in new multi-tenant.

residential buildings.

* *

It is not uncommon in today's environment for owners of new multi-tenant, residential buildings to contract the placement of Inside Wire (IW) and Network Terminating Wire (NTW) to electrical contractors. The placement of NTW by private parties has caused concern in the field given BellSouth's general policy to install the Network Interface inside each customer's premises, and to own, install and maintain all cable and wire up to that point.

Usually, NTW is prewired by the electrical contractor when the owner desires concealed wiring and:

- does not coordinate with BellSouth I/M forces for the prewire of NTW by Company forces.
 and/or
- does not wish to incur the cost of conduit for later placement of NTW by BellSouth.

This situation is most commonly encountered in small, multi-tenant buildings (i.e., 2 - 12 units). Owners of high rise residential buildings (over 3 stories) normally include riser and lateral conduits in their building plans.

RL: 90-08-055SV (10/7/90) provides general guidelines for handling customer-owned premises wire, however, field personnel have raised several specific questions. The Q&As included in Anachment 1 should assist the field in handling these situations.

F03B36Z 0000100

RL: 91-12-039SV Attachment 1 (Page 1 of 2)

OUESTIONS & ANSWERS REGARDING CUSTOMER-OWNED PREMISES WIRING *

 Q: Is a building owner required to provide conduit for Network Terminating Wire (NTW)?

A: No. Although conduit is preferred due to ease of installation and maintenance, there is no regulatory or code requirement for conduit.

2. Q: Should BellSouth I/M forces prewire NTW during the construction phase of a building?

A: BICS, I/M and OSPE personnel should strongly recommend the placement of conduit when concealed wiring is required. If the owner is unwilling or unable to provide conduit, I/M forces should attempt to prewire the NTW.

3. Q: What happens if concealed NTW that is not in conduit requires replacement or reinforcement?

A: The owner and/or customer should be advised that concealed wiring will be provided if a means of concealment is provided. If a means of concealment is not provided, the NTW will be run exposed if possible and agreeable to the owner and customers.

4. Q: Under what conditions will the Company provide exposed wiring?

A: Exposed wiring should be installed in accordance with normal I/M procedures providing that:

- a) the exposed wiring does not cross one tenant's space to reach another's.
- b) the conditions are such that exposed wiring can be installed in a safe, efficient manner; i.e., adequately fastened to walls or other structures. Wiring should not be hung out of windows, laid on the ground, or draped unsupported along walls. Exceptions may be necessary as a temporary measure to provide service while permanent facilities are placed.

* Inside Wire (IW) is on the custom' Interface (NI) and is deregulated (NTW) is on the Company's side the network distribution termi. placed by non-Company forces is Owned Premises Wiring (COPW). ork e - I to stomerIf further questions arise, field personnel should contact their local Implementation Staff coordinate. Core staff contacts are as follows:

Steve Vanderburg. I/M, 205-977-3097 Tom Larsen, BICS/CSPW, 404-529-5426 Lowell Thomas, OSPE, 205-977-2605

J. A Bedell

Operations Manager -

OSP Engineering Systems Development

G. D. Harkness

Operations Manager -

I&M/IMC

L. J. Durel, Jr.

OSP Engineering Support

Attachment



file code: 840.0101

subject: FCC Part 68 Rules and Regulations

type: Information Letter

date: October 7, 1990

distribution list: ND0, ND1, ND2, ND3, ND4, ND5, ND7, NC1, CE1, S08, CP2

related letters:

file

other: FCC Docket No. 88-57

to: Vice Presidents - Network Operations and Provisioning

entities: Southern Bell, South Central Bell, BellSouth Services

from: Vice President - Network Strategic Planning

description: Provides an update to BellSouth's wiring/cable guidelines as a result of

FCC Docket No. 88-57.

* * *

This Region Letter provides an update to BellSouth's wiring/cable guidelines as a result of regulations set forth by the Federal Communications Commission (FCC) in the Report and Order recently released in FCC Docket No. 88-57.

GENERAL

Part 68 of the Federal Communications Commission's (FCC) rules governs the terms and conditions for connection of customer provided terminal equipment and wiring to the telephone network. Part 68 is designed to assure consumers, manufacturers and local exchange carriers that terminal equipment and wiring may be connected to the telephone network without causing harm.

In 1988, the FCC undertook a review of the rules setting forth the terms and conditions under which customers may install and connect inside wiring to the network. The Report and Order, better known as FCC Docket No. 88-57, provides for the following:

- (1) modifies Section 68.104 to allow customers to connect simple inside wiring to the telephone network by direct access to local exchange carrier installed wiring at points up to and including the demarcation point.
- (2) revises the definition of the demarcation point in Section 68.3 so that in most cases it will be at or near where wiring enters the customer's premises.
- (3) modifies Section 68.108 to authorize the local exchange carriers to discontinue service when harm occurs originating from customer-installed wiring, or when the local exchange carrier reasonably believes such harm is imminent.
- (4) deletes Sections 68.213 (e), (f) and (g) concerning notification, acceptance testing and extraordinary procedures.

- (5) determines that jacks and plugs used in inside wiring must conform to Subpart F.
- (6) states that it expects local exchange carriers to develop and submit to subscribers an informational brochure on the rights of subscribers to perform inside wiring operations.

In accordance with State and Federal regulations, and our own Corporate philosophy, it is BellSouth's policy to provide customers with reasonable and non-discriminatory access to the network. Historically, BellSouth has adhered to the general principle that physical interconnection to the network should be at a point easily accessible to the end user. BellSouth will continue to adhere to this principle to the extent permitted by the revised Part 68 rules.

BellSouth and several other regional operating companies/parties have filed for partial reconsideration and clarification of this Report and Order. However, a formal review of our petition is not expected in the short term and, when answered, the response may not be favorable. The Report and Order is in conflict with some provisions in State specific tariffs governing the connection of customer provided terminal equipment and wiring to the telephone network. Efforts are currently underway to file tariff revisions to bring these tariffs into line with the new Federal rules. To the extent that the Federal rules conflict with rules in the State tariffs, we believe the Federal rules control and should be followed.

To facilitate adherence to the terms and conditions ordered in FCC Docket No. 88-57, these guidelines have been prepared and must be followed until further notice. These guidelines are effective upon receipt. Our existing BellSouth cable/wire policy will be revised and reissued to reflect the terms and conditions of this Order pending the outcome of our petition for reconsideration and clarification. The following guidelines pertain to the administration of items (1), (2) and (5) as defined above. The remaining terms and conditions as ordered by the Commission (items 3. 4 and 6) are clarified later in this document.

D. W. Jones

Vice President -

Network Strategic Planning

Attachment

TERMS AND CONDITIONS FOR INSTALLATION AND CONNECTION OF INSIDE WIRING

FCC Docket No. 88-57

TERMINOLOGY

The Commission defines "Demarcation Point" as the point of demarcation and/or interconnection between telephone company communications facilities and the terminal equipment, protective apparatus or wiring at a subscriber's premises. The Commission in Docket No. 88-57 revises the definition of demarcation point so that in most cases it will be at or near where wiring enters the customer's premises.

Two new terms have been adopted by the FCC. "Single Unit Installations" and "Multiunit Installations". Pending further clarification of these terms, the following is BellSouth's understanding of these terms which will be used only to the extent necessary to implement the Rules set forth by the Commission. These terms do not require a change in how the telephone companies currently define "customer premises" for different types of buildings (i.e., multitenant, single tenant, campus, high-rise, etc.) under their operating practices.

Single Unit Installation - Generally, a building that contains only one customer premises (i.e., unit) as determined by the telephone company's reasonable and nondiscriminatory standard operating practices. Thus, under the telephone company's existing practices, a single family residential house or a stand-alone, small business location such as a convenience store or a service station would each represent a single unit installation.

Multiunit Installation - All other properties, buildings or structures that contain multiple customer premises (i.e., units) as determined by the telephone company's reasonable and nondiscriminatory standard operating practices. This includes, but is not limited to, multitenant residential [apartments and condominiums], shopping centers, high and low rise commercial, and campus arrangements.

<u>Premises</u> - Generally, a dwelling unit, building or other "unit" of property as determined by the telephone company's reasonable and nondiscriminatory standard operating practices. Therefore, where a commercial building with more than one (1) floor is considered a multiunit installation (for example, where each floor represents a separate customer premises) under the telephone company's existing practices, it will continue to be treated as such even if the building contains only one tenant.

Simple Wiring - Wiring used for one or two lines located on the customer's side of the demarcation point.

Complex Wiring - Wiring used for more than two lines usually in association with PBX or key system equipment, also referred to as intrasystem wiring.

GENERAL GUIDELINES FOR DEMARCATION POINT LOCATION

A. Single Unit Installations

The Commission defines the demarcation point for single unit installations, both simple and complex wiring, as "a point within twelve inches of the protector or, where there is no protector, within twelve inches of where the telephone wire enters the customer's premises."

1. Existing Installations – In cases where an Outside Network Interface (ONI) does not exist, the demarcation point is considered to be on the customer's side of the protector, at a point twelve (12) inches from where previously installed telephone company premises wiring connects to the protector. Customers may connect to all existing wiring at any point up to and including the demarcation point, regardless of whether the wiring was installed by the telephone company or the customer. In cases where an ONI has been installed, a standard jack/plug arrangement is provided and housed within the ONI for connection of deregt lated inside wire. However, in the unlikely event the customer chooses not to use this TELCO provided arrangement for termination of his inside wiring, the customer may connect to all existing utring at any point on the customer's side of the ONI.

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2. New Installations - Our current policy of providing a combination network interface/protector (ONI) at the customer's premises on new installations will continue at this time. In cases where an ONI is installed, a standard jack/plug arrangement is provided and housed within the ONI for connection of deregulated inside wire.

Previously, any new inside wiring, as well as additions and modifications to existing inside wiring were to be connected to the network through an already existing jack or telephone company installed demarcation jack. The terms and conditions of this Order allow customers to connect simple inside wiring to the telephone network by direct access to telephone company-installed wiring at points up to and including the demarcation point. On existing installations where there is no network interface or jack within 12 inches of the protector, the customer can access the wiring at any point on the customer's premises so long as it is no closer than 12 inches to the protector.

Connection of simple wiring and terminal equipment at this point may continue to be made through a jack as previously allowed or by direct attachment to previously installed TELCO wiring. This direct attachment includes, but is not limited to, splicing, bridging, twisting and soldering. There is no requirement for a jack or other device (i.e., entrance bridge) at this location. Maintenance of inside wiring, defined as all wiring on the customer's side of the demarcation point, will continue to be performed on a deregulated basis.

- NOTE 1: Direct attachment applies to simple wiring only.
- NOTE 2: Complex inside wiring and terminal equipment will continue to be connected to the network through standard telephone company-installed plugs/jacks (Network Interfaces) conforming to Subpart F of the Commission's Part 68 Rules, in such a manner as to allow for easy and immediate disconnection.
- NOTE 3: The customer or premises owner may not access telephone company-installed wiring and facilities on the telephone company's side of the demarcation point. CUSTOMERS MAY NOT ACCESS THE TELEPHONE COMPANY-INSTALLED PROTECTOR.

B. Multiunit Installations

UNDER THE COMMISSION'S REVISED DEFINITION OF THE DEMARCATION POINT FOR NEW MULTIUNIT INSTALLATIONS, THE MULTI-UNIT BUILDING/PROPERTY OWNER SHALL DETERMINE WHETHER THERE SHALL BE A SINGLE DEMARCATION POINT LOCATION FOR ALL CUSTOMER PREMISES OR SEPARATE SUCH LOCATIONS FOR EACH CUSTOMER PREMISES UNIT. This revised definition of the demarcation point will apply for connection of both simple and complex wiring.

The revised definition of the demarcation point for multiunit installations allows the building/property owner to establish a single point of demarcation anywhere on the property or in the building(s). This single point of demarcation as decided by the building/property owner may include, but is not limited to, where the TELCO wiring/cable crosses a property line or where the TELCO wiring/cable enters a multiunit building or buildings (i.e., basement).

The revised demarcation point also permits the building/property owner to establish multiple demarcation points (one for each customer premises unit) within the multiunit premises. However, where there are multiple demarcation points, any demarcation point may not be located at a point further than 12 inches, or at the closest practicable point considering space needed for backboards, connecting blocks, etc., from where the telephone company's cable/wire enters the customer's premises (unit) through a wall, ceiling, conduit or other support structure (e.g., duct, raceway). Where a customer premises unit contains an equipment room, the closest practicable point of entry shall be in the equipment room, unless the building/property owner indicates it is practicable to locate the demarcation point at a location closer to where the telephone company's cable/wire enters the customer's unit.

NOTICE

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The terms and conditions of the Order place the Building Industry Consulting Service (BICS) Engineer in the key position of meeting BellSouth provisioning objectives and at the same time complying with the requirements of the Commission. It remains BellSouth's policy to design, install and maintain network facilities at a point easily accessible to the end user to the extent permitted by the Order. Therefore, it is important that our BICS Engineers work with the building/ property owner to insure that we provide network facilities to each customer's unit. Personnel with BICS responsibilities must be proactive in negotiating with building/property owners to determine the location of the demarcation point(s).

1. Existing Installations – For existing multiunit installations, where there are multiple demarcation point locations within the multiunit premises, the demarcation point location at each customer's premises [unit] shall be a point within twelve inches, or at the closest practicable point (e.g., equipment room), of where the telephone wire/cable enters the customer's premises (i.e., unit, floor). The closest practicable demarcation point for existing complex wiring will continue to be at the existing telephone company-installed jack. The Order does not require any physical relocation of existing network interfaces to this demarcation location. However, deregulated simple or complex wiring/cable will be required and connected to the network at this point should service(s) be requested beyond this point.

For existing multiunit installations, the revised definition of the demarcation point does not preclude relocation of the demarcation point at the request of the building/property owner, but only with the consent of the customer(s). This may involve a request by the building/property owner to relocate demarcation points for some or all customers to a single location or conversely, to move demarcation points from a single location to each customer's premises. Should the building/property owner decide to relocate a network interface(s) to a new demarcation point(s) with consent of the customer(s), tariffed move charges will apply. Existing procedures applicable to the negotiation of charges to the building owner for removal, purchase and/or continued use of wiring and equipment between the former and the new demarcation point should be followed.

2. New Installations – For new multiunit installations (i.e., office buildings, apartments) where the building/property owner decides to designate separate demarcation points, network cable/wire should continue to be placed from the building terminal to each customer's premises (i.e., unit, floor). However, for new as with existing multiunit installations, the demarcation point at each customer's premises [unit] shall be a point within twelve inches, or at the closest practicable point (e.g., equipment room), to where the telephone cable/wire enters the customer's premises (i.e., unit, floor). Deregulated simple or complex wiring/cable will be required and connected to the network at this point should service(s) be requested beyond this point.

In new multi-unit installations, the revised demarcation point rules provide that the building/property owner may decide to establish a single demarcation point location for all customers. This single demarcation point location as decided by the building/property owner may include, but is not limited to, where the TELCO wiring/cable crosses a property line or where the TELCO wiring/cable enters a multi-unit building or buildings (i.e., basement). This single demarcation point may not be at a location where fire or explosion hazards may exist, and all equipment and wiring must be protected from adverse effects of weather and the environment in which it is used.

If the new multi-unit building/property owner elects to establish a single demarcation point location for all customers. South Central Bell and Southern Bell will install its regulated network facilities to that location and terminate on telephone company-installed Network Interface jacks. As per existing procedures, a separate Network Interface jack will be provided to each customer and installed in such a way as to allow each customer access to our network. Deregulated simple or complex wiring/cable will be required to provide service beyond this point.

Previously, any new premises wiring, as well as additions and modifications to existing premises wiring were to be connected to the network through an already existing jack or telephone company installed demarcation jack. The terms and conditions of this Order allow customers to connect simple inside wiring to the telephone network by direct access to telephone company-installed wiring at points up to and including the demarcation point. On existing installations where there is no network interface or jack within tractive inches, or at the closest practicable point (e.g., equipment room), of where the telephone wire: nable enters the customer's premises, the customer can access the wiring at any point up to and including the demarcation point. The customer or premises owner may not access telephone company-installed wiring and facilities on the telephone company's side of the demarcation point.

Connection of simple inside wiring and terminal equipment at this point may continue to be made through a standard jack/plug as previously allowed or by direct attachment to previously installed TELCO wiring on existing multi-unit installations. This direct attachment includes, but is not limited to, splicing, bridging, twisting and soldering. There is no requirement for a jack or other device (i.e., entrance bridge) at this location. Direct attachment applies to simple wiring only.

Complex inside wiring and terminal equipment will continue to be connected to the network through standard telephone company-installed plugs/jacks (Network Interfaces) conforming to Subpart F of the Commission's Part 68 Rules, in such a manner as to allow for easy and immediate disconnection.

Until further notice, our current policy of providing a Network Interface jack at the customer's premises on new installations will continue should the building/property owner decide to establish multiple demarcation points within the multiunit premises. Maintenance of inside wiring, defined as all wiring on the customer's side of the demarcation point, will continue to be performed on a deregulated basis.

C. Customer Owned Premises Wiring (COPW)

Customer Owned Premises Wiring (COPW) refers to any wiring that is installed and owned by parties other than South Central Bell and Southern Bell (i.e., vendors, end users, building owners). In some cases, building owners may install wire/cable on their property and although the owner may not also be a "customer", such wiring falls within the definition of COPW.

Assuming building owner concurrence, it is the intent of South Central Bell and Southern Bell to design, install and maintain all network facilities from the Central Office to the premises of the end user. Accordingly, every effort must be made by BICS. OSPE and I&M Field Forces to coordinate with owners for the installation of telephone-company owned cable and wire during the construction phase of the building(s).

It is expected that most building owners will not wish to establish a single demarcation point serving all customers and will permit South Central Bell and Southern Bell to provide network cable and wire to individual units (premises) of end user customers. Even though this may be the case, there may be some instances where the owner may fail to coordinate construction activities to accommodate telephone company-installed intrabuilding wiring. In these cases, the building owner may offer the wiring he/she has installed to the telephone company for our use in locating demarcation points in each tenant's unit.

If the building owner has installed COPW from the building entrance to individual living units with the intent that the Company utilize this wiring to locate demarcation points in individual units, the Coordinator – Sale/Purchase of Wire (CSPW) should attempt to negotiate the purchase of the COPW from the building owner or contractor, assuming the installed wiring meets BellSouth's technical specifications. If the CSPW is unable to purchase the wiring and the building owner cannot or will not provide a BellSouth acceptable means of access to each unit, the demarcation point will revert to the building entrance. The use of COPW must only be considered a temporary measure until the COPW can be purchased from the building owner or Company facilities installed.

OTHER REQUIREMENTS OF FCC DOCKET NO. 88-57

A. Incidence of Harm

The Report and Order modifies Section 68.108 of the Commission's Rules to authorize the local exchange carriers to discontinue service when harm occurs originating from customer-installed wiring, or when the local exchange carrier reasonably believes such harm is imminent.

Should terminal equipment, inside wiring, plugs and jacks, or protective circuitry cause harm to the telephone network, or, should the carrier reasonably determine that such harm is imminent. South Central Bell or Southern Bell shall, where practicable, notify the customer that temporary discontinuance of service may be required. However, wherever prior notice is not practicable. South Central Bell or Southern Bell may temporarily discontinue service if such action is reasonable under the circumstances.

In case of such temporary discontinuance. South Central Bell or Southern Bell shall:

- (1) promptly notify the customer of such temporary discontinuance
- (2) afford the customer the opportunity to correct the situation which gave rise to the temporary discontinuance, and
- (3) inform the customer of his right to bring a complaint to the Commission.

B. Notification. Acceptance Testing and Extraordinary Procedures

The Report and Order deletes Section 68.213 (e), (f) and (g) of the Commission's Rules concerning notification, acceptance testing and extraordinary procedures.

- 1. Notification Section 68.213(e) requires customers, upon request of the telephone company, to provide the telephone company with a description of the location of jacks installed, a statement that building and electrical codes are being complied with and information on the wiring employed, among other information. With this Report and Order, notification procedures have been eliminated. BellSouth currently does not require notification from its customers and it believes that routinely requiring notification could inhibit customers from installing their own inside wiring.
- 2. Acceptance Testing Section 68.213(f) requires customers to test wiring installations and, if failure results, to disconnect their wiring from the network. Since the telephone company has been allowed to discontinue service when harm occurs or is imminent, the Commission concluded that the requirement for testing is unnecessary for network protection and, therefore, has been eliminated.
- 3. Extraordinary Procedures Section 68.213(g) authorizes the telephone company to take certain steps, referred to as extraordinary procedures, to protect the network from harm when there is a violation of Part 68, a failure during testing of newly installed wiring or when harm has actually occurred. These extraordinary procedures include monitoring or participating in testing, requiring the use of protective apparatus, and a right of inspection of wiring including removal of all wiring installed behind walls and within ducts. The Commission believes that the right of the telephone company to discontinue service when harm occurs or is imminent is fully adequate to protect against harms arising from inside wiring operations. For this reason, the Commission eliminated the provision for extraordinary procedures in the Report and Order.

C. Customer Information on Inside Wiring

In the Report and Order, the Commission provides for the continuation of on-going consumer education. The Commission states that it expects the telephone companies to develop and submit to subscribers, residential and business, information (i.e., brochures, telephone directory and billing inserts) describing the rights of subscribers to perform inside wiring, including those established in the Report and Order. Should customers request, South Central Bell and Southern Bell are further expected to provide complete information on the customers' rights to install inside wiring and to fully disclose our standard operating practices concerning the location of the demarcation point.

EXISTING ADMINISTRATIVE OFFICES TO OTHER SIMPLE WIRE **STATIONS** CPE New Demarcation Point per 88-57 PLACED AS NTW PRIOR TO 88-57 Terreinstion BellSbuth 1.1 Protected **Building Terminal** 8 8 то со Network Interface **FJ48** MODULAR JACK OLD DEMARCATION POINT LEGEND **BellSouth Tartif Provided Network** Cable and Terminal Facilities BellSouth Tartif Provided Network Terminating Wre-Cable Customer Provided Wire/Cable

IN THIS OFFICE THE OLD DEMARCATION POINT FOR THE DATA SERVICES WAS THE RJ48. THE NETWORK TERMINATING WIRE IS TERMINATED ON A 66 BLOCK IN THE EQUIPMENT ROOM. UNDER THE NEW RULES, THE DEMARCATION POINT FOR THIS SERVICE IS THE FIRST PRACTICABLE POINT WITHIN THE CUSTOMER'S UNIT, THAT IS THE 66 BLOCK. IN THIS CASE THE DEMARCATION POINT MOVES BACK TO THE 66 BLOCK. THE CUSTOMER IS ALLOWED TO ACCESS THE WIRE ANYWHERE PAST THE 66 BLOCK.

SERVICE ORDER ANALYSIS REPORT

ADDRESS DISCREP.	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	ост	NOV	DEC	YTD
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DUNWOODY	NA	NA	NA	51	4							•	55
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CHAMBLEE	NA	NA	AN			3								3
COURTLAND	NA	NA	NA								•			0
HOLLYWOOD	NA	NA	· NA			1								• 1
PEACHTREE PLACE	NA	AN	NA											0
WOODLAND HILLS	NA	NA	NA											0
TOCO HILLS	NA	NA	NA				•							
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	ATT ASHFORD DUNHOODY RD I	NE.
ı	addr 3/16 - 3746	
- 1	****************	
ŧ	144r 3/16 ASHFORD DUNNOON	DY RO NE 14FV tea F 3/13 ASHFORD DUNHOODY RD rt 4286 rz 13 ptr 3864AD1841 type: FLEX
	ckid NONE ip stat fo	F tea F 3713 ASHFORD DUNHOODY RU ra 13 rt 4286 diet te 3664AU diet pr 847
	ckid 452-/84# tp str	AT HKG tea S 3/16 ASHFORD DUNHOODY RD FZ 13 FT 4286 JIST CA 3/16AD dist pr 576
	ckid 466-9264 ip str	AL MKB ten S 3716 ASHFORD DUNHOODY ND rz 13 rt 4286 diet en 3716AD diet pr 877
_	ckid 452-8924 1p 11:	AT MKB tea S 3/16 ASHFORD DUNHOODY RD rz 13 rt 4286 dist ca 3/16AD dist pr 578
	ckid NONE is stat for	CF tea # 3692 ASHFORD DUNNOODY ND rz 13 rt 4286 dist ta 3664AD dist pr 879
	. this NONE in stat PO	F tex F 3692 ASHFORD DUNHOUDY RD rz 13 rt 4286 dist ca 3464AD diet pr 988
	Addr 3718 ASHFORD DUNNOOL	TY RD NE APT A serv ten 3716.1 ASHEGRD DUNNOONY HD rt 4286 rz 13 ptr 3716ADEDZ6 6CBW 1 types STD
	skid NUNE lo stat CI	tea 3/18.1 ASHFORD DUNHOODY RD rz 13 rt 4286 dist ca 3/16AD dist pr 548
	Adde 3718 ASHEORD BURNDON	Y RD ML APT B serv ter 3718.1 ASHFORD DUNNODHY RD rt 4286 rz 13 ptr 3716ADIDZ6 8csu 1 type1 51D
	ckid AKA-/A93 In at-	ALE MKG tea 3/18.1 ASHFORD DUNHOODY RD rz 13 rt 4286 dist ca 3/16AD dist pr 527
	AA- 3710 ACHEODO DINNOON	to the side of the contract of
	this Alberton's an ana	PY ND NL API C serv tes 3718.1 ASHFORD DUNNOUDY HD rt 4286 rs 13 ptr 3716ADib26 scaw 1 types STD
	THE GOVERNMENT OF SELECTION OF	t HKG tea 3/18.1 ASHFORD DUNHODDY RD rz 13 rt 4266 dist ca 3/16AD dist pr 647
4	TOOL SITE VEHICLE LOOK	FY RD NE AP) D serv Les 3718.1 ASHI ORD DUNNOONY RD rt 4286 rz 13 ptr 3716AD:626 fcsw 2 type: STD
	EXIG TOP TOP TO BE	t HKB ten 3/18.1 ASHFORD DUNHOODY RD rz 13 rt 4206 dist ca 3/16AD dist pr 544
3	TOUR SELECTION DONNOUD	FE ARG. COR 3718.1 ASHFORD DUNNUUDY RD. P2 13 FE 4286 - d(15 CR 3716AB - d(15 PF B44 BY RD NE APT E BORY too 3718.1 ASHFORD DUNNOUDY RD. PE 4286 - P2 13 - ptr 3716AD±626 - BCSW 1 - types STD. → B- WKG - too 3718.1 ASHFORD DUNNOUDY RD. P2 13 - PE 4286 - d(15 too 3716AB - d(15 too 549 - m)
	EXIG 408-3747 IP 852	E HKG tex 3/18.1 ASHFORD DUNHOODY RD rx 13 rt 4286 dist cx 3/16AD dist pr 549 *
3	rade 3/18 VZHI OKO DOMMOOD	Y RD NE API F serv tea 3718.1 ASHI GRU DUNNOODY RD rt 4286 rz 13 ptr 3716AD1626 scaw 1 typet STO
	ckid 154-9898 ip sta	TY ND NE API F serv ten 3718.1 ASHI GRU DUNNGODY RD rt 4286 rz 13 ptr 3716AD1626 scaw 1 typet STD to NKB ten 3/18.1 ASHFORD DHNNGODY RD rz 13 rt 4286 dist ca 3/16AD dist pr 558
4	Addr 3/18 ASHFORD DUNNOOD	IT RU NI: AIT B BETY LER 3718.1 ASHIFORD DUNNOODY RD IT 4286 IZ 13 ptr 3716AD±626 &caw 1 types STO H
	ckid 482-1336 lp sta	
Ł	kaar 3718 Ashford Dunmood	Y RD NL APT H serv tem 3718.1 ASHFORD DUNMOODY RD rt 4286 rz 13 ptr 3716AD:626 Ecsw 2 types STD
	ckid 454-7281 ip sta	E UKB tem 3/18.1 ASHFORD DUNMOODY RD rx 13 rt 4286 dist cm 3/16AD dist pr 526
à	addr 3718 ASHFORD DUNMOOD	Y RD NE APT 1 serv les 3718.1 ASHFORD DUNNOONY RD rt 4286 rz 13 ptr 3716AD1626 Schw 1 types STD 💆
	ckid 158-/3/% lp sta	t HKG tex 3/18.1 ASHFURD DUNHOODY RD rx 13 rt 4286 dist ca 3/16AD dist pr 846
2	244r 3718 ASHFORD DUNNGOU	IY AD NE API J serv lea 3718.2 ASHFORD DUNNOODY RD rt 4286 rz 13 ptr.3716AD1861 8csv 1 type: STD - M
	ckid 458-8464 ip sta	t HKB tea 3/18.1 ASHFORD DUNHOODY RO rz 13 rt 1286 diet ca 3/16AD diet er 546 👝 👝
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	ckid 452-8448 ip sta	B HKG tem 3/18.2 ASHFORD DHNHOODY RO rx·13 rt 4286 diet cm 3/16AD diet pr 676
4	4ddr 3718 ASHFORD DUNNOOD	IY RD NL. APT L. serv tea 3718.2 ASHEGRI BUNNOODY HD. rt 4286 rz 13. ptr'3716ADz601 #caw 1. typez STD. 📉
	ckid 482-1782 ip sta	t HKG tea 3/10.2 ASHFORD DUNHOUDY RO rx 13 rt 4/266 dist ca 3/16A0 dist pr 573
4		IY RD NE APT M serv tem 3718.2 ASHFORD DUNNOODY RD rt 4286 rz 13 ptr 3716AD1661 8cm 1 typem STD 💢
	ckid 458-#145 lp sta	E HKG tea 3/10.2 ASHFORD DUNNOODY RD rz 13 rt 4206 dist ca 3/16A9 dist pr 662
4	Addr 3719 ASHFORD DUNNOOU	IY RD NE. API N. serv leb 3718.2 ASHFORD DUNNOODY RD. rt 4286° rz 13. ptr 3716AD£GG1. 8csw 1. type: STD
	ckid 155-8/82 ip sta	t HKB tea 3/18.2 ASHFORD DUNHODDY RD rz 13 rt 4206 dist ca 3/16AD dlat pr 672
	ADDRINUL DROTHER BITE TORK	IY RD NL. UNIT O serv tes 3718.2 ASHFORD DUNNOODY RD. rt 4286 rz 13. ptr 3716ADz661. 8csw 1. typez 6TD
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		ENKG tea S 3728.1 ASHFORD DUNHOODY RO rz 13 rt 4286 dist ca 3718AD dist pr B22
3	adar 3720 ASHFORD Dunnoo l	IY RD NE APT B. serv tea 5-3720.1 ASHFORD DUNNCODY RD. rt 4206 rz 13. ptr 3716AD±601 dcs w 1. typex STD
	ckid 458-/833 ip sta	E HKG tea S 3/20.1 ASHFORD DHNHOODY RD rx 13 rt 4206 dist ca 3/16AD dist pr 525
		IY RD NE APT C serv les S 3726.1 ASHFORD DUNNOODY RD et 4286 ez 13 ple 3716ADs601 desw 1 lypes 8TD
		E HKG tea 8 3/20.1 ASRFORD DUNHOODY RO rz 19 rt 4206 diet ca 3/16AD diet pr 524
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1	edar 3728 ASHFORD DUNHOOD	Y RO NE APT F serv tea S 3/20.1 ASHFORD DUNHOODY RD rt 4206 rz 13 ptr 3/16A01501 Desw 1 types BTD
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1	TOOMNING AND AREA BYLE APPR	Y RO NE APT Q serv tea S 3/28.1 ASHFORD DUNHOODY RO rt 4286 rz 13 ptr 3/1640e1581 desu 1 types STD
	TOTAL 0000122	
1	F03B36Z 0000132	
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SERIAL	NUMBER:	

RE-CT PLAN UNITS WITH SECOND LINE CF OR CT

	•	-
COMPLEX/SUBDIVISION NAME:		
CONTRACT, CODDLING CONTRACT		

ADDRESS	SERVING TERMINAL	F1 CA.PR	F2 CA.PR	LP STAT
1100,100				
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C. J. Sanders
Vice President-Network Operations/South

20th Floor Southern Bell Tower 301 W. Bay Street Jacksonville, Florida 32202 (904) 350-2424

May 25, 1993

TO: R. W. O'Neill - Ombudsman

RE: Ombudsman Complaint - Network Terminating Wire (NTW)

Please thank the caller for his/her interest in improving service to our customers.

Company policy is to own and maintain the facilities on the Company's side of the demarcation point. This policy is detailed for you in the attached memorandum from Group Presidents W. M. Ferguson and J. A. Drummond. However, problems develop when the builder does not coordinate with BST, does not place conduit, and/or uses nonstandard materials or methods. These situations are addressed in the attached RL: 91-12-039SV.

It is important to remember that the Company cannot force a builder/contractor to install conduit, nor can we prevent them from placing NTW. Additionally, FCC Docket No. 88-57 allows the multi-tenant building owner to determine the location of the demarcation point. Conversely, the Company is not obligated to connect to substandard wire or utilize improper support structures (See attached RL: 90-08-055SV Pages 6-7). If local management accepts owner provided NTW, which meets our standards, the procedures specified in RL: 90-08-055SV Section C should be followed. Construction, I&M, BICS, and Engineering all have a role to play in providing NTW. Departmental responsibilities are outlined in NL: 89-08-201SB enclosed for your reference.

I encourage the caller to review the above documentation, perhaps this will assist him/her when specific situations are encountered in the field.

C. J. Sanders - Vice President Network - South Operations

Attachments

cc: W. R. Perry

R. R. Rupe



May 11, 1993

·TO:

Jerry Sanders

FROM:

Robert W. O'Neill And

SUBJECT:

Ombudsman Complaint - Network Terminating Wire

5 I received a call today from a Service Tech from the area. He is concerned about what he feels is a needless expense we are encountering and the associated customer outages caused by the use of sub-standard network terminating wire.

According to the caller, when an apartment or town house is built, we run the facilities to a terminal at one end of the building. In a great many circumstances, according to the caller, we allow the builder who had done the inside pre-wiring to run the wiring past the network interface to the terminal at the end of the building. He stated the builder uses regular inside wire in conduit for this network terminating wire.

The caller said that too quickly this conduit will get water in it and cause the wiring to short out. Because of the way the wire is placed in the conduit, when we have to replace it we cannot use the conduit. We must either go through the walls of the building (which the owners and occupants object to) or bury the cable across the back yards of other units (which these occupants object to).

The caller has asked why we do not assign Service Techs to place the correct network terminating wire when the apartment or town house is being built rather than relying on the builder to do this. He has been told we do not have the people to do this. He is especially concerned because we just accept what the builder installs and then assume responsibility for it. So, when it goes bad, we must replace it. I would appreciate your investigating this matter and reporting the results of your inquiry to me.

Crise : a cient Color Termenting Were - installed by our of ar unitacio (not sure) - using sub statuere - frequestion of

Let Diawe: p:

APT/TOWN HOUSE

JUINT UNIT

Z 3 4 5 Interface(s)

Terminal Terminating Wire

orca - apts & tourhoused - when builder framerical house, he also runs were to terminal (regain: which were - in randout; - not the correct were - conduit fells when it were short

Anound is - Sokia is night for nation terms were so with it me. I had not must replace & either (1) go thru waits of bing in a bury in yord of sites with a Costly te do

Carleson said is in tried to get might introcted, but no this expended let bear the days to continue of the superficient survey and said the to have Saw Tank install surrect wiring me aft flow fame is be gradied

TXV & Tunion & Then or In John Ko - Enduster - to entylish is Kh-129 wants were so warned the by - spice -> Luisin patorin No-we will a will - our things Now - union other order of the the transfer of Due geng had - can't put in how not a wo know 10 21 3 1. , 10/ Survey 100 1 - land got a given mission - get the a come when it would · Kin por most sist · we from the source agt Award eapt)

- general Strains Not Pel bu us · hit is the Part Had with the - must born were an other has see - M. TXII TREES - At Tom more 192 C. O'Stor, with well - 54 / 20 24 --> 1'1

· Krish Jan & me

- West when it Ed is a

TO:

Judi North

FROM:

Robert W. O'Neill

SUBJECT: Ombudsman Complaint - Refunds in Florida

I received a call from a Service Representative in Florida, with a question she felt raised an ethical issue. The question related to why we appeared to have a double standard for payment of refunds, depending on whether the customer who called in accepted our explanation or got angry or insistent on receiving a refund.

The caller noted that we provide a standard explanation concerning eligibility for refunds and, if the customer accepts that explanation, no refund is paid. If, however, the customer becomes angry and insists on receiving a refund, the customer is told the request will be sent to Quality Assistance who contacts the customer within 5 days. According to the caller, the customer then generally receives a refund.

The caller related that customers have told the caller that condo associations are telling their member that to receive a refund all the customer has to do is say, "I never ordered the inside wire plan." who had accepted our The caller cited one customer is explanation last July but recently called back saying he had not ordered the inside wire maintenance plan. He received a refund, having admitted that is what his condo association had told him to ನ್ನ say. The caller cited another customer where the circumstances were similar.

I explained that we have to assess each claim sent to Quality Assistance on an individual basis. I told the caller if we did not have good records concerning whether or not the customer requested the plan, we would err on the side of making the refund. However, because of the caller's concern, I told her I would look into this matter.

I would appreciate your having someone review this issue and report the results to me.

25/13/93 Call from L 5/14/93 Called recently attended ethes Reminar & had question he refund being po dustomers under IW maint flan settlement , when cust call asking about refund, serv repr says according to. (1) not blanket refund (2) "some" accts incorrectly billed (3) we have (4) We have notified out Only these are eligible for I D'A cust refundi Per I, if sust accepts our explanation - no refund pd , if sust backs , gets argry or insistent , gets macty, etc. we tell them we well refer to Quality assistance who will contact cust u/i 5 days. 15 In latter circumstance, per , we will pay refund 16 believes we have double std which she believes is ethical que. cust accepts our explanation, they do Not get refund; if east gets angry, we pay 19 related I call in which cust had accepted our explanation last July, but has railed back & said his condo ass n had told him & others in the conduthat all they had to do was to say, "I never ordered it" and we would pay a refund. He now Days he dedn't order & w recewing about \$ 113 refund (23 is cust #)) where related another similar situation (cust # 25 oust is receiving \$ 765 refund

June 7, 1993

MEMO TO:

Bob O'Neill

Bob, this is in reference to the note you sent me on May 19, 1993 about refunds in Florida. The issue was a call you received from a Service Rep in Florida about the fact that we were giving refunds to customers who didn't deserve them.

I shared your memo and talked with both Bill Dresser, General Manager - Customer Services-Florida, and Joe Lacher, President - Florida Operations. We all agree that your explanation to the Rep is the correct one. And that is that we will err on the side of the customer. It is the right thing to do in this situation.

Juli north

PAYING UNNEC. REFUNDS - CONDO ASS'NS TELLING MBRS WHAT TO SAY
Resid. Sew. investigated

Agree we may be faying unnecessary refunds

Policy - err on customes's side

- To 1 0' /(evl Date 5/13)93	
	J WERE OUT
4 m <u>.</u>	<u>₹</u>
OF Phone Area Code	Number Extension
TELEPHONEO	PLEASE CALL
CALLED TO SEE YOU	WILL CALL AGAIN
WANTS TO SEE YOU	URGENT
RETURNED	YOUR CALL
Ethical L	Lohan:
	Circly
	Operator
	11 - 200 SETS 11 - 400 SETS CARBONLESS

2 = 1/3/93 Chilippin Jennice & [Onbudaman - ethical issue] Mich @ 3PM - I was out of town 5 5/14/93 rul a sall to Ethico Class Last who Isan - Leu Rip (Pala Brack) reside G re refund - res - mount plan Esp. in bonde ass no -ask for refundamentes If sust adament (inate, etc.) - we pay regund. plantet billed incommelly Time acis ID'd customer If accept expranation — no refund of bull, get nasty, ets Refer to Quality - Those who make adjustment (nej regard) Dept Will call them back Other Dept Corbact W/1 1 west getting \$700 + refund Cust called in July re refund Call lost who mitz in Cords But dieset want Cust accepted - Now adament Comment -

Geing We by Condo

August 2, 1993

TO:

Jerry Sanders

FROM:

Robert W. O'Neill LWD

SUBJECT:

Ombudsman Complaint - Data Base Cleanup

I sent the enclosed memorandum to you on May 14, 1993, but I have not received a reply. I would appreciate your checking on the status of this investigation and providing me with a report.

May 14, 1993

TO:

Jerry Sanders

FROM:

Robert W. O'Neill

SUBJECT:

Ombudsman Complaint - Data Base Cleanup

I received a call from an individual is whose functions include. The caller is concerned that we have quiet a few circuits which have been disconnected, but have not been removed. According to the caller, there are "D" Orders which have been pending for a long time - some from as far back as a couple of years.

According to the caller, COSMOS will show the circuits as working, but the circuits will not appear on TIRKS or BOCRIS. The caller is concerned that we have installed new circuits in some instances where facilities are already available, but our records incorrectly reflect the facilities are in use.

The caller indicated that removal of dead circuits is such a low priority that it generally is not being done. As a result, the caller believes we are expending needless funds installing new circuits where there are circuits actually available.

I would appreciate your having someone investigate this matter and report the findings to me.

3

Works and

The is trying to focus on physical facility disconnect, but the circuit have not been removed. Thus, facilities are tied up & are not avail for other cust use

She said they get run-acound from CPC forces, saying mont looks at removal of dead airc as a last resort when there's mothering else to do Caller believe we freg'ly install airc when "dead airc" could be used, but for their not being removed according to caller COSMOS will show circuits as working, but circuits will not show ap on TIRKS or Boceis

Also, some circuits have been dead for some time - "D" orders issued long ago, but not worked (some as far back as 12/90)

	To 1. 0' Kail	,	Time	7:25	· ·
f	WHILE YOU		WER	E OUT	•
<u>.</u>	of				ngan.
7.	Area Code	Nu	mber	Extension	<u>Property</u> atail.
	TELEPHONED		PLEASE	CALL	
	CALLED TO SEE YOU		WILLC	ALL AGAIN	
	WANTS TO SEE YOU		URGEN	T	
	RETURNED	YO	UR CALL		
21	Message ·		Ext	<u> </u>	ann san an , ny i n' <u>say</u> t
•	PE: O'mbed	2.m	حعم	حمعا	_
		-	Operator	indy	
)	AMPAD 23-021 EFFICIENCY® 23-421		SETS SETS	CARBONLES	

2 =11/93 rec'd call 9254 not in Called 1210 P 300 P Called · FACS Office Data Base Cleanup. Try to get focus on phy disconnects - but not removed CPC forse . - mant looks G deed eine as east resat SBT core teid up w/cied core - connected to un-used - Not Con Fac fiely - not usable 49 circs, Can ID@ least this many Kur-around Eg tied up - not usable for other Tun COSHOS = whig. I oughed 50 circ = Not Shown TIRKS - BOCRIS "D" Onder essued by ago - Some long ago so 12/90 Curc is dead - but can't free up. For use

May have to run new fac when "diac" and award

F03B36Z 0000148

October 8, 1992

7 RE: 8 9 10 FL 03-05064

On September 4 1992

placed a telephone call to Southern Bell's Employee Reporting Line. reported that two Services Technicians had come to him with a complaint about the captioned employee.

did not identify the two Services Technicians, because he claimed they were apprehensive about calling the Employee Reporting Line themselves for fear of getting into trouble.

related that these two Services Technicians had told him that on

while they were working on two separate troubles, their supervisor, had come to them and instructed them to close the two troubles out. When the Services

24 Technicians informed: that the troubles were not ready to be 25 closed out allegedly told the Services Technicians to close them anyway because the 24-hour commitment to the customer was about to expire.

This matter was assigned to George E. Nicholson, Staff MangerSecurity, who contacted and arranged an in-person interview with him for September 8, 1992. That interview took place as scheduled at provided a signed statement concerning the information he had provided on his call to the Employee Reporting Line.

"Restricted Bellsouth Security Information"

15

During his interview, refused to identify the two involved Services Technicians, but he did agree to talk to them about being interviewed themselves. Iwas advised that unless these Services Technicians came forward with their information on the customer accounts involved and provided statements concerning the instructions given to them by Security investigation into this matter could not proceed.

8 The interview with ______ took place on September 8, 1992, and nothing more was heard from him until Nicholson telephoned him on 10 October 7, 1992. At that time, 'stated that he had relayed Nicholson's comments to both of the Services Technicians, but that neither of them wished to come forward and be interviewed.

Nicholson discussed this matter with you by telephone on October 8, 1992, and we are now sending you this correspondence for whatever use you feel is appropriate. We are now closing our investigation into allegation and any questions you have, may be directed to Staff Manager-Security George E. Nicholson in West Palm Beach at telephone number 407-837-9270.

Yours very truly,

Mario C. Martinez General Security Manager

GEN:rr

October 8, 1992

MEMORANDUM

.TO:

SHEREE LARGIN, ASSISTANT STAFF MANAGER-SECURITY

PROM:

GEORGE E. NICHOLSON, STAFF MANAGER-SECURITY

RE:

EMPLOYEE DEFALCATION

EMPLOYEE DEFALCATION FL 03-05064

This is to advise that Employee Reporting Line complaint number 9-8, received in your office on September 4, 1992; was investigated by this writer under the captioned case number. This case was closed on October 8, 1922, and the results were summarized in a letter report.

Any questions you have may be directed to this writer at telephone number 407-837-9270.

1-8-Cld Hicholson to pend copy of letter report. LM on recorder-

"Restricted BellSouth Security Information"

EMPLOYEE REPORTING LINE INCIDENT REPORT

DATE 9/4/92 TIME 9:454 RECEIVED BY ARX
FULL NAME OF PERSON MAKING REPORT
6 JOB TITLE
DEPARTMENT
8 LOCATION
9 CONTACT NUMBER
NATURE OF CALL On Lucy 9/1/92 2 Sure Look
11 Culle Of the track that the
toled the tole on to the
the seem to close out I trouble
that were incomplete. The six Tech
idensic the workles were not read to
Close out the Land do it anyway Necause
out a 9 tout commitment is about to
expire the sire. Technicians were
apprehensive W Call the employee reporting
SUBJECT INFORMATION: Line
FULL NAME(S)
DEPARTMENT Network - Operation
ZZ LOCATION_
23 PHONE NUMBER
24 SUPERVISOR
HOW DID COMPLAINANT ACQUIRE INFORMATIONS From the 2
Service Technician
REFERRED TO Mario AREA Miami
DATE 9-4-92 TIME 10:00A F03B36Z 0000152

June 18, 1993

Mr. Steve Klimacek Attorney 150 West Flagler Street Suite 1910 Miami, Florida 33130

Dear Mr. Klimacek:

RE: EMPLOYEE REPORTING LINE REFERRALS

91-09-08 FL 03-05064 93-03-13 FL 13-05198 92-11-18 FL 20-05051 92-08-01 FL 10-0-273

Please find the attached photocopies of Security investigations on related to Employee Reporting Line Reports. This information is being forwarded to you at the request of Mr. Mickey Cox, Director-Security, via Ms. Darlene Vines.

If you need any additional information please advise.

Yours truly,

Manager-Security

MP:rr

F03B36Z 0000153

ERL# 12-9-8 3-5064-79N BELLEOUTH SECURITY OPERATING GUIDE

SECTION 2 EXHIBIT D

INTERVIEW LOG

	DATE: 9 18192
	TIME: Start 1005am End 1220 pm
7	PLACE:
୫	
7	INTERVIEWEE:
	INTERVIEWER: Grope E. Micholon & Mcholon
	WITNESSES:
	Was Union Representative requested? Yes No
	Was the Union Representative Advised of the Yes No no Pay Policy?
	UNION REPRESENTATIVE:
	REMARKS:
	· ·
	:

F03B36Z 0000154

3-5064

(06/90)

PLACE: 3-24 Piece.
PAGE | OF 4

5	Sa Danasta Alba Aniliana	
3	, do hereby make the following	
	free and voluntary statement to George E. Nicholson, who has	
	identified himself to me as a Staff Manager-Security representing	
	Southern Ball . I understand this statement may be used as	
	evidence. I was born on	
10	and my social security number is	
11.5		
12	and my telephone number is {	
-	. I am employed by Bell South Communications at a fair Lestenes	
	Technician . My net credited service date or date of	
15	employment is	
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20	On Tuesday	
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29	land and the male	
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4-93 05:00PM FROM THERN BELL TO MR. COX	P021/021)
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	(1/91) 8-5064

March 15, 1993

MEMORANDUM:

TO:

SHEREE LARGIN

ASSISTANT STAFF MANAGER-SECURITY

FROM:

DEL CASTELLANOS

STAFF MANAGER-SECURITY

RIE: 1

EMPLOYEE REPORTING LINE INCIDENT REPORT 10-10

SOUTH FLORIDA FILE 13-0-2553

The attached memo, although dated February 15, 1993, was not released until March 11, 1993 because it was intended to answer employee reporting line complaints 10-10 and 10-14. Since 10-14 is still being worked on, this correspondence was obtained from Network and they agreed to issue another report once 10-14 is completed.

As the response indicates, employees made incorrect assumptions and there is no substance or logic to the complaint. If further information is necessary, please advise.

DC:mrp

Attachment

TO 1-205-321-6876

P003/004

03-15-93 03:35PM

0;11m0;11m

February 15, 1993

Memorandum

To: Nario Martinez
General Security Manager
Miami, Florida

6 From:

Re: Employee Reporting Line Incident Report 6-10

Listed below are the replies to the two incident reports from November 2, 1992:

/2 The following response was from

Report No. 13-0-2553-1

We are not sure where the employee is getting their information.

The fact of the matter is the and remote switches were severly damaged by salt water intrusion caused from Hurricane Andrew. Central Office switch replacements have never to my knowledge been funded by FEMA or any other government organization. It is irrelevant whether either of these switches fed one or 1000 customer. The fact remained they both had to be replaced.

Ž

	PAGE	/ of /	
EMPLOYEE REPORTING LINE			
	15 10		
STAFF OFFICE REFERENCE NUMBER_			
DATE 10-23 TIME 9:10 A RECE	IVED BY JOS		
FULL NAME OF PERSON MAKING REPORT:			
JOB TITLE:		<u>-</u>	. n.,
DEPARTMENT:		***	
LOÇATION:			
CONTACT NUMBER:	•	·	
NATURE OF CALL: Two remotes	urticle) in		
servin about so cust.			
servin about 200 cust were		plones de	- Ln
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SUBJECT INFORMATION: Left a lo	D tasty in	employe	ي
11. · £	pert efforte	Mestory.	∕ □
FULL NAME (S): MICLESON	repaire	7000	
DEPARTMENT: //eturnh		ize.	
LOCATION		in and the Australia	
PHONE NUMBER:		·	
SUPERVISOR:	3		
HOW DID COMPLAINANT ACQUIRE INFORMA	PION		
		•	
M -1.	-m.	•	
REFERRED TO: // Culiner	AREA:	an	
DATE: 10-23-92	TIME: /D.o	ZIAM_	

June 18, 1993

Mr. Steve Klimacek Attorney 150 West Flagler Street Suite 1910 Niami, Florida 33130

Dear Mr. Klimacek:

RE: EMPLOYEE REPORTING LINE REPERRALS

93-09-08 FL 03-05064 93-03-13 FL 13-05198 92-11-18 FL 20-05051 92-08-01 FL 10-0-273

Please find the attached photocopies of Security investigations on related to Employee Reporting Line Reports. This information is being forwarded to you at the request of Mr. Mickey Cox, Director-Security, via Ms. Darlene Vines.

If you need any additional information please advise.

Yours truly,

Manager-Security

MP:rr

F03B36Z 0000162

EKL# 92-11-18

20-5051-7

02-09-93 04:29 PM

P04

AUTHORIZED SALES REPRESENTATIVE PROGRAM OPERATIONS GUIDE

SECTION 4 PRE-SALE ACTIVITIES

AGENCY SALES EXECUTIVE RESPONSIBILITIES

Introduction

The ASE is responsible for management of an assigned group of ASRs who interface with the local BSASO. ASR pro-tele activities performed by the ASE include the following:

> strengthening ASR training via sominars and newsietters, detailing service enhancements, tariff updates, service applications, etc.;

advising ASR personnel of BellSouth current and planned central office capabilities;

arranging for busy studies and assisting in interpretation of raw data results as requested by ASR personnel:

providing assistance in the pricing of network service propossis

determining network service deposit requirements for the ASR:

advising and directing SD in the design of ASR complex network service configurations;

advising interdepartmental team members of specific ASR sales information required to develop network configurations:

consulting and reviewing with the ASR to ensure design meets performance criteria and objectives:

serving as a resource for network technical support to assist in ASR recommendations or customer presentations when requested.

F03B36Z 0000163

P004 #27

YACTE A

07-14-03 04-05PM POOS HEO

'-09-93 04:29 PM

P02

Appendix A.1

Halas Commission

TII. ELYCTBLE SALES

- COMPANY shall pay REPRESENTATIVE a commission for the sales of ESSX Service made by REPRESENTATIVE for a one (1) month or longer contractual payment option plan as defined in COMPANY tariffs. An ESSX Service sale is defined as the establishment of an ESSX Service which consists of the first common block having all stations of a customer with the same primary directory listing which are served by the same central office equipment.
- REPRESENTATIVE will be authorized to market ESSX Service in the geographical areas (Authorized Marketing Areas) designated in Appendix A of this Agreement.
 Only sales made by REPRESENTATIVE in its Authorized Marketing Area(s) will be eligible for compensation.
 Any sales made by REPRESENTATIVE outside its Authorized Marketing Area(s) will be installed and maintained by COMPANY and no commissions will be paid on such sales unless prior, written approval is granted by COMPANY.

Approval to sell outside REPRESENTATIVE's Authorized Marketing Area will be granted on an individual, one-time, basis only. If REPRESENTATIVE wishes to market in any Authorized Marketing Area not specifically authorised by COMPANY, as provided herein, REPRESENTATIVE must apply for such authorisation to COMPANY.

- Motwithstanding any contrary provision of this Agreement, COMPANY reserves the exclusive right to C. market BSSX Service directly to (1) COMPANY'S affiliates as defined in Paragraph VIII.B. of this Agreement, and (2) to customers requesting ESSX Service directly from COMPANY.
 - REPRESENTATIVE shall not be paid a commission, or Account Maintenance Fee as described herein, for any sales made to customers of other authorized sales representatives, including sales made by COMPANY and including sales made to affiliates of COMPANY. ALOVAVAR MENTENETONION CHEESE ESTABLE ESTA COMETE ESTABLEM.

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F03B36Z 0000164

PO02 #27 / 02-09-93 04:33PM

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P03

12-09-93 04:29 PM

MARGORY AVITATION SELVAR CELIAR CELIAR CELIAR PROGRAM OPPLATIONS GUIDE

SECTION 7 Compensation

heeks errvice compensation parameters

Introduction

The Authorized Sales Representative Program for ESSK® Service provides that ASRs will receive compensation for ESSX® Services customer accounts sold and/or maintained on behalf of either South Central Bell or Southern Bell.

Components

ASR compensation for HSSX® Service is paid in accordance with the following schematics:



Compensation for all A12 General Subscriber Services Tariff Items offered under payment option 1.

Compensation for account maintenance functions performed on an ESSX® Service account which resides in an ASR's customer base.

Kad User Line Charge

In those states where the Bnd User Line Charge (BULC) is in the intercom rate, the Agency Sales Executive (ASE) is responsible for "backing out" the EULC in the monthly amount shown on the transmittal submitted to the Contract Administrator (CA) for commission payment.

Recovery Of ESSX® Commissions The Companies have the right to recover all commissions paid for contractual ESSKO Service sales disconnected prior to the expiration of a contract period. BellSouth also has the same recovery rights concerning non-contractual ESSX® Service sales disconnected with less than one hundred eighty (180) in-service billing days.

ASIRs have the right to appeal any case in which they feel a commission should not be received by going through the formal appeal process.

20-5057 F03B36Z 0000165

93%

₹=96%

P01

DATE: 2/9

TO: LARRY MEEKER FAX #

FROH! BILL (301 W. Bay Street, Rm. 16111

Jecksonville, FL 32202

PHONE # 904/350-5600

FAX # 904/350-5611

INSTRUCTIONS:

F03B36Z 0000166

02-09-93 04:33PM

PRESENT . COSTS.

* (124) STATION ESSX * (24) NETWORK ACCESS REGISTERS (NARS)

PROPOSED COSTS-

* (124) STATION ESSX * (24) NETWORK ACCESS REGISTERS (NARS)

COMPUTED SAVINGS: MONTHLY

TOTAL ESSX CHARGES



Southern Bell

ESSX PRICING FOR

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A BELLSOUTH COMPANY

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928-0841 Meeter

Southern Bell

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

LETTER OF ELECTION FOR ESSX SERVICE

The undersigned subscriber requests the Southern Bell Telephone and Telegraph Company to provide ESSX _5_ service in accordance with the Telephone Company's lawfully filed tariffs. Important tariff provisions relating to the ESSX service are set forth herain:

1. Southern Bell will furnish, install and provide maintenance service for ESSI _ S service including:

ESSI Common Equipment, Main Station Lines, Extension Station Lines, Group A Features, Group B Features, Optional Service Features and Line Terminating Arrangements.

E. The subscriber agrees to pay Southern Bell installation, service establishment and a monthly rate as detailed on Attachment A for an elected service period of <u>ket</u> wonths. The monthly rate will continue for the elected service period and will not be subject to Company initiated change during such period.

Additional ESSN service may be added as follows:

- A. Equipment can be added to an existing system at the commoner's option, and the payment of rates and charges in the currently effective tariffs for such service will be applied.
- B. At the customer's option, additions may be paid for over the remainder of the existing system's payment period, and be added onto the existing agreement, providing at least 30 days remain in the customer's payment period. The addition and installed system payment periods will then have a common expiration date. The charge(s) for the addition(s) will be the current filed rate(s) for the equipment for the same payment period as the installed system's existing payment period. If the installed system's payment period is not in the current tariff, the rate charged for the addition will be that of the next shorter filed payment period. If less than 30 days remain in the current payment period, additions may only be placed on the one-month payment period at the current rates in effect for the one-month period.

A BELLSOUTH Complety

PROM SOUGHTS

C. If the coterminous option for additions is not elected by the customer. additions may only then be placed on the one-month payment period at the current rates in effect for the one-month period.

- 3. If the service requested by the Subscriber is cancelled prior to the establishment of service, but after the date of ordering reflected herein, the Subscriber is required to reimburse the Company for all expense incurred in handling the request before notice of cancellation is received. Such charge, however, is not to exceed all charges which would apply if the work involved in complying with the request had been completed.
- 4. At the expiration service period the Subscriber may continue the service according to renewal options provided under the tariff. If the Subscriber does not elect an additional service period or does not request discontinuance of service, then the above service will be continued at the monthly rate then currently in effect for month-to-month Subscribers.
- 5. In the event that any item of service is terminated prior to expiration of the elected service period, the Subscriber is subject to the following liability charges:
 - A. Main Station Lines, Group A Features, Group B Features, System Features under contract 90% of the remaining amount due for each main station line disconnected after the customer's total main station lines count falls below 90% of the total main station lines initially installed or of the annually adjusted total.
 - B. Station Line moves (other than inside moves) will require disconnect of the station line at the existing location. with the application of all appropriate termination charges. Such moves would be treated as a new installation at the new location.
- 6. Suspension of service is not parmitted for equipment covered by this agreement.
- 7. With the written permission of Southern Bell a subscriber may assign the plan to another subscriber subject to the provisions of the Company tariff.

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20-505/

Attachements

Mario C. Martinez
General Security Manager
Southeast Florida Area

Suite 1021 6451 N. Federal Highway Ft. Lauderdale, Florida 33308 305 492-3530

May 26, 1993

Mr. John P. Derham III Sales Vice-President BellSouth Communications, Inc. 500 North Orange Avenue Room 552 Orlando, Florida 32803

Dear Mr. Derham:

∠Oprovided and that ¶

14

RE:

EMPLOYEE REPORTING LINE COMPLAINT FL-92-11-18
FL 20-05051

The Fort Lauderdale Security Office received an allegation via the Employee Reporting Line that

That an unethical working relationship with an Authorized Sales Representative (ASR), located in Florida. A security case was opened and assigned to Larry L. Meeker, Staff Manager-Security for investigation.

The caller, who made the allegation, requested anonymity when interviewed on February 3, 1993, and declined to provide a statement. However, the caller said that he could provide evidence was providing proprietary information 28 that would show that 29 to 🧳 an employee of 🎨 A recent example given by the 30 caller was the ESSEX contract with BellSouth Communications, Inc. had sold ESSEX to them on a 36 month contract which expired in September 1992. About two days after the 33 contract expired and approached : offering ESSEX service for \$700.00 less than they had originally paid.
_ signed a contract with * for "for ESSEX. This was 37 discovered by the caller when The caller looked into their records called to report a trouble. 39and discovered that had sold them less than what BellSouth had

"Restricted BellSouth Security Information"

only knew that they were saving money.

FILE: FL 20-05051

PAGE: 2

Meeker interviewed and obtained a copy of the contract.

stated she was approached by and someone from in November 1991. The contract was extended for 60 months at that time and there was to be a savings of \$792 a month. The cost comparisons that were proposed by reveal 124 station ESSEX and 24 network access registers existing and proposed with an monthly saving of \$792.12. Also, stated she did not deal with after the contract was signed because she felt it was easier to call Southern Bell directly.

was interviewed and stated that it was job as the Vendor Support Coordinator to provide support to ASR's as stated in the Authorized Sales Representative Program Operations Guide. This support includes obtaining and providing non-proprietary customer information to ASR sales personnel upon request.

were interviewed and stated they the sales made by the ASR's were a part of their yearly sales results. was 2/ identified by and as a major competitor for BellSouth Communications, Inc. Account Executives (AE) and as a very aggressive company. Also, that the AE may feel that the support given by the Vendor Sales Coordinator gave the ASRs an unfair advantage.

Meeker has contacted the caller five times since the original interview attempting to get the further evidence indicating misconduct, each time the caller was unable to provide additional information regarding the allegation.

Yours very truly,

Mario C. Martinez

General Security Manager

LLM:rr

Copy to: Darlene Vines, Assistant Staff Manager-Security

"Restricted BellSouth Security Information"

May 26, 1993

To:

Darlene Vines, Assistant Staff Manager

From:

Mike Phagan, Manager-Security

Re:

Employee Reporting Line Dispositions

I have listed below, the status of each case per your May 25, 1993 memorandum.

	ERL#	SE FILE# SUBJECT	DISPOSITION
8(92-11-18	20-5051	Case open (LLM)
9	93-02-07	3-5101	Case is open with lead coverage outstanding.
<i>f1</i>	93-02-09	3-5102	Investigation was conducted at the direction of Legal, Priviledged and Confidential: Subject to Attorney/Client Priviledge and Work Product. All records are being maintained in Legal, Miami, Florida.
18	93-02-12	3-5104	Awaiting Auditors' report.
20	93-03-16	3-5107	Employee terminated May 6, 1993.
21	93-05-03	10-5064 (FM)	South Florida case.
23	93-05-04	3-5118	Case open (TJF).
24	93-05-12	3-5166	Case open (GEN).

If you have any questions, please contact Mike Phagan at (305) 492-3536.

MP:ds

February 3, 1993

MEMORANDUM

TO:

SHEREE LARGIN, ASSISTANT STAFF MANAGER-SECURITY

FROM:

MIKE PHAGAN, MANAGER-SECURITY

RE:

EMPLOYEE REPORTING LINE INCIDENTS

11-5, 11-10, AND 11-19

Per your request, I have attached responses for Employee Reports 11-5, and 11-10, both have been handled by Southeast Florida.

We were unable to find any reference to Report 11-18. I therefore contacted the complainant this date, and determined no one had contacted him since his report was made. Arrangements have been made for his interview this afternoon. This case will be handled in an expeditious manner.

Attachments:

_ 11-5 _ 11-10

MP

CALLER WISHES HIS IDENTITY NOT TO BE DISCOSED OUTSIDE SECURITY

EMPLOYEE REPORTING LINE INCIDENT REPORT

REFERENCE NUMBER 11-18

Date Received: 11-18-92 at 1:00 PM by Sheree Largin

Full Name of Person Making Report:

Department: Marketing - BSC

7 Contact No.: PLEASE CALL THURSDAY MORNING IF ADDITIONAL INFORMATION IS NEEDED.

Caller said BSC has services under contract, such as ESSEX, to numerous customers and knows or can find out when the contracts expire. "Somehow" just before the contract expires, steps in and gets the contract with the customer renewed without it being re-negotiated gets paid by BSC for the contract like it was a new contract. Caller said there is no way! ____ can know when the contract will expire unless they are told by!

20 A recent example given was the contract with

2/1
About 3 years ago, BSC sold ESSEX to them on a 36 month contract. (Contract expired about 5 months ago) Roughly 2

23 days after contract expired, and 1 approached

24
25 will provide ESSEX for \$700 less than what they had 24 originally paid for it, which was from us (BSC). signed with 27 This was discovered by caller when

called to report some kind of trouble. Caller got to looking into their customer records and discovered when their contract expired and when the new contract was signed and also 3/realized they had purchased less from than what they had originally purchased from us, however customer didn't realize it—all she knew was that she was saving \$700.

Caller said when a service such as ESSEX is to be installed, a form 5309 is prepared and input into 'the system' (name of system unknown). Engineering has access to this system so see what kind of work they need to do and what equipment is needed. Caller said 38 that just a few days after the 5309 is input, began inquiring 39 about them getting the contract and there is no way they can 40know about the 5309 unless they are told by I

FAXED

41

works with

James L. Presu General Security Manager

May 23, 1993

Mr. Mickey Cox Director-Security BellSouth Telecommunications Inc. 20th Floor, 600 North 19th Street Birmingham, Alabama 35203

Dear Mickey:

15 SUBJECT:

16

17 18

FILE: FN03-05084A

On November 23, 1992, your office received an anonymous letter shad instructed Account Executives to back date 22 stating that 23 contracts to enable *

to qualify for the Florida 3rd Quarter Sales Award Program. 25 addition, the letter alleged that is known among his subordinates for his lack of good ethics. North Florida Security completed and submitted a detailed investigation report on December 23, 1992. No evidence to support the accusations contained in the letter was developed.

As you recall, on March 3, 1993, Vice President Corporate Compliance, John Gunter requested that some Account Executives and 32 Sales Managers in /offices be interviewed as a follow up to the investigation. The anonymous 34 letter stated that Account Executives and Managers would corroborate the allegations.

36 Two account Executives in the which did not meet the 3rd 37 Quarter Sales Program criteria, and

were interviewed and denied any knowledge of any unethical sales reporting activity. They also explained that the driver for Sales Award Programs and Compensation is the orders that are input into the service order system, not contract dates. Both stated that the highest ethic standards are expected and demanded by 43 and his management team.

Southern Bell

26JJ1 Southern Bell Tower 301 W. Bay Street Jacksonville, Fl 32202-4400 (904) 350-2823

B.S.T. Security Headquarters JUN 0 7 1993 Eirmingham, Ala.

Mr. M. Cox Director - Security 600 N. 19th Street, 8th Floor Birmingham, AL 35203

Dear Mr. Cox:

Because of the recent dismissal of AE's in Georgia over the sale of Watsavers, I'd like to be sure I'm covered just in case someone comes nocking at my door with a similar ethics issue.

- has instructed me and several other AE's to go to our customers and back date contracts // so that we for the 3rd Quarter sales award program currently being run in the State of Florida. It is unfortunate that my sales did not qualify to meet the program's deadline, and I was prepared to deal with not receiving an award. However, falsifying the date of the sale, thereby qualifying for the monies is not worth losing my job over.
- Actually, I'm appaled that the upper management of this of corporation is currently considering for a promotion; the same individual who has instructed us to do this; the same individual who among his subordinates is known for his lack of good ethics.
- I wish to remain anonymous for fear of losing my job and career; 24 this is the fear with his directives and his ethics.
- I would urge you to conduct an investigation. He has given such 27 instructions in and numerous AE's and administrative type managers would collaborate this allegation.

Thank you for your immediate attention to this matter.

cc: J. Derham V. Jobson

B.S.T. Security Headquarters

NOV 23 1992

Birmingham, Aia.

2 In addition, two

were interviewed and also denied any knowledge of

unethical activity by

or anyone else.

made the 3rd

Quarter objective, 109.50% while

80.36%. Both Sales Managers also stated that contract dates are
not a driver in the Sales Award or Compensation Program and felt
the allegation was unfounded.

Account executive, who finished at 97.57% was interviewed and also denied knowledge of unethical behavior. He stated that no one has ever told him to back date 12 contracts. Stated that during the 3rd Quarter Sales Program he had some pending orders that were not in the service order 14 system by the contest cut off date. Said that would not allow these to count towards the contest because they were not in the system at the cut off date. I stated that and the entire department has a strong emphasis on ethical behavior.

181
and also stated that he had no knowledge of any unethical behavior, false sales reporting, or back dating of contracts. He also related strong commitment to ethics and felt that the compensation system contained adequate check and balances to prevent fraudulent manipulation of sales results also stated that contract dates do not drive the Compensation or Sales Award Programs.

No evidence to substantiate any of the allegations in the anonymous letter was developed in this subsequent investigation.

If you have any questions please contact me or Staff Manager-Security Warren Dove.

Very truly yours,

General Security Manager North Florida Area

CWD: kw

File No. : FN03-05084

INVESTIGATIVE REPORT

State of Origin: NORTH FLORIDA			
Reporting Office: I	nvestigation At:	Date: 12-23-92	
miti		· · · · · · · · · · · · · · · · · · ·	· 10 10 10 10 10 10 10 10 10 10 10 10 10
Fitle:	Classification:		
	EMPLOYEE DEFALCATION		
	Reporting Manager:	Steno:	
	WARREN DOVE	WELLS	4
· • .	Period Covered by Inv 11-23-92 THROUGH 12-	vestigation: -23-92	
SYNOPSIS:			
state of Florida. #di which would have paid him \$ the appeal of three Account towards the award program be final sales results. In add do not require a contract. denied ever instructing any covered his employees many	arter "push" sales award progid not qualify for the 3rd of 1500. Investigation revealed executives to count sales mad ecause the sales were not position, there are network sale was interviewed on Done to backdate contracts and times on the importance insaction. No evidence to support	nuarter "push" i that w e during the c ted on the Ser es transaction ecember 18, 19 d stated that of exercisin	award denied quarter otember ns that 992 and he has
Investigating Manager:	Approved:		
Waven Done Staff Manager-Security pu	James	L Freder	
Copies To: GROUP PRESIDENT-FLA. GROUP VICE-PRESIDENT DIRECTOR-HUMAN RESOURCES DIRECTOR-SECURITY	General Sec	uricy manager	
SALES VICE-PRESFIORIDA ASST. VICE-PRESSECURITY	NOT TO BECOM	E PART OF	

B

PREDICATION

On November 23, 1992 an anonymous letter was received by BellSouth Security Director Mickey Cox alleging that

had instructed Account Executives to back date contracts in order that they, Sales Managers and himself, would qualify for a third quarter sales program and experience financial gain. A copy of the letter was also sent to Vernon Jobson, Group Vice President, and John Derham, Sales Vice President-Florida for BellSouth Communications, Inc. This investigation was conducted by Staff Manager-Security Warren

BACKGROUND

13 *	is employed by B.
14	
15	
16	operations. is years of age having been born on
17	He has a net credited service date of
10	63 and a social security number of
, 0	* TEST SECTION SECTION AND THE PROPERTY OF SECTION AND THE

Security Department Records Review

Security Department records were reviewed and it was learned that has not been the subject of any previous investigations.

DETAILS

On November 23, 1992 the following anonymous letter was received by BellSouth Security Director, Mickey Cox.

Mr. M. Cox Director-Security 600 N. 19th Street, 8th Floor Birmingham, Al 35203

Dear Mr. Cox:

Because of the recent dismissal of AE's in Georgia over the sale of Watsavers, I'd like to be sure I'm covered just in case someone comes nocking at my door with a similar ethics issue.

has instructed me and several other AE's to go to our customers and back date contracts ; may quality for the 3rd Quarter sales award program currently being run in the State of Florida. It is unfortunate that my sales did not quality to meet the program's deadline, and I was prepared to deal with not receiving an award. However, falsifying the date of the sale, thereby qualifying for the monies is not worth losing my job over.

- Actually, I'm appalled that the upper management of this 5 corporation is currently considering for a promotion; the same individual who has instructed us to do this; the same individual who among his subordinates is known for his lack of good ethics.
- I wish to remain anonymous for fear of losing my job and career; this is the fear instills in people that do not necessarily agree with his directives and his ethics.
- I would urge you to conduct an investigation. He has given such /3 instructions in !
 numerous AE's and administrative type managers would collaborate this allegation.

Thank you for your immediate attention to this matter.

Cc: J. Derham
V. Jobson

19 Interview of

20 on 12-1-92,

21 was interviewed regarding Florida's third

22 quarter sales award program. stated that the program was called "3rd quarter Push". It ran from July 1, 1992 through September 30, 1992. The program was designed to stimulate sales and was based on a person's attainment of 35% of their respective adjusted annual revenue objective during the 3rd quarter. This was a total revenue contest not a product specific contest. The results of the contest were finalized upon September's final sales results, 29 sometime around mid October, 1992. further indicated that award checks for all winners were included with November

<u>Awards</u>

compensation payments.

Eligible employees meeting the contest criteria were entitled to the following awards:

Account Executives (M4, M3, M2,	and MO)	\$750
Regional Account Managers (M7)	~	\$750
Support Managers (PG3 & PG4)		\$750
System Designers (I & II)		\$750
Sales Managers (M4 & M8)	•	\$1000
Support Managers (PG5)	•	\$1000

-3-

Service Consultants

\$400 awarded in the form of a Gift Certificate from Service Merchandise, redeemable for merchandise only.

Regional Sales Managers (PG6)

\$1500

Account Executives and Sales Managers had to attain 35% of their adjusted annual objective during 3rd quarter. System Designers, Service Consultants and support Managers were measured against their specific role within the District. Some may have been tied to a specific channel, others may have been tied to an Account team. The various Districts in Florida were given the latitude to set this up as they saw fit to allow the fairest alignment possible at the start of the 3rd quarter. The employees efforts were measured against their unique role in the Sales District. This was the first time this year that Service Consultants were included in a sales bonus program. On July 1, 1992, Florida's revenue objective was increased approximately \$13 million. This was passed down to the various Districts and to the Account Executives and Sales Managers. A projection of 60% of the Florida sales force attaining the objective was made when the plan was filed. The actual amount that attained the award was 53%. Sales results are always one month in arrears. The compensation system downloads the orders in the system usually in the middle of the next month. For example, September's sales are calculated in mid October when the system does a download. A report is issued three times per month that allows the sales personnel to see their results and to notify their District compensation person of any mistakes or discrepancies. Each month the sales personnel receive two preliminary " Listing by Sales Code Reports" as well as a final "Listing Report". In addition, a monthly "Compensation Report" is furnished to the Regional Sales Managers to be distributed to the sales force. In addition, there is an appeals process to process sales discrepancies. The Account Executive writes a letter of appeal to the Sales Manager in the respective Regional Sales Office. If the Sales Manager concurs with the appeal it is submitted to the Regional Sales Manager (PG6). If the Regional Sales Manager concurs with the appeal it is referred to and ultimately to Sales Vice President-Florida, recalled that she received three appeals from

43

44 45

> 5۵ 51

district during the third quarter. submitted an appeal because she sold a network product in September but failed to get a contract agreement signed. She had to go back to the customer and get the contract signed. As a result, the order was delayed being input into the system and was not on September's compensation report. stated that withdrew the appeal and would not allow sale to count

withdrew the appeal and would not allow

```
towards the "Push" award program as it was not on September's
                     came in at 85.3% of objective and did not receive the
       bonus award. In addition,
5
                                         stated that
                                      lid not receive the award as he was
       97.57% of objective. A large CPE order for First Union was in the
       hold file as not all of the appropriate contractual documentation
       was received in time to have the sale appear on September's final
       results. Wadley also rejected this appeal. also related that
                                       finished the contest at 38.86% of orders not posting on
       objective due to /
       September's results as expected. lso rejected these appeals
       which prevented the Account Executives as well as himself from
       benefiting from the award program. explained that service orders are issued by the Customer Services Business Office and a
15
       "service compensation number" (SCN) is placed on the order. The SCN numbers on the service orders are matched against the list of SCN's
       by the compensation mechanized system. Revenue calculation to
       retire the respective revenue objectives is calculated by the
       system based on product factors associated with applicable USOCS.
```

The following employees in district attained the third quarter push bonus:

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25
                      % of Objective
27
                      170.64%
 28
                      109.54%
                      260.24%
 29
 30
                      124.63%
 31
                      142.83%
                      417.90%
 33
                      383.40%
 34
                      109.89%
  35
                      143.20%
  36
                      128.48%
  37
                      192.83%
 39
                      433.28%
                      193.17%
                      171.65%
  4
                      144.47%
  42
                      142.83%
  43
                      115.40%
  44
                      115.40%
  451
                      109.54%
  46
                      260.24%
  47
                      170.64%
  48
                      192.83%
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5
                      109.05%
                      110.66%
 678
                      126.66%
                      108.97%
 9
                      154.08%
 10
                      108.93%
                      108.99%
 11
                      110.66%
 12
                      125.27%
                      108.19%
 15
                    . 108.84%
                      124.95%
17
                      108.99%
14
                      110.66%
20
12
                      173.748
23
                      198.12%
24
                      153.13%
25
                      107.67%
26
                      168.64%
27
                      168.65%
ೱ
                      168.60%
29
                      173.74%
 30
                      173.74%
31
                      173.74%
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Interview of

:40

35 On December 14, 1992, BellSouth Communications, Inc. 36 was interviewed. indicated 37 that he knew of no integrity problems with He remarked that 38 he not never seen ter the way he runs the business for the sake of a sales bonus plan that may be in effect. In addition, explained that there are various types of contracts used by the sales organization. CPE sales contracts must be signed by the customer and prior to the sale implementation. The customer as well as the authorized Account Executive sign this document which is a legal document and is retained in Company files. Sales of some of Network services do not require a contract. An example of this is Watsaver. Sales of some other type of Network services do require a document called an "Agreement" or "Letter of Election." This is used to outline tariff provisions and term agreements. In some cases, the customer does not even date the form. In fact, there are many situations whereby a sale can be made, orders input into the system and compensation paid in which no contract or written document is involved.

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3 Interview of 1

On December 18, 1992, BellSouth Communications Inc. was interviewed and provided the following signed statement.

December 18, 1992 7:30AM

Page 1 of 10

14 make this free and voluntary statement to Warren Dove who has identified himself to me as a Staff Manager-Security representing BellSouth Communications, Inc. I understand that this statement may be used as evidence. I was born on My social security number is

I am employed by BellSouth Communications, Inc. as a

19 Regional Sales Manager. My supervisor is 20

BellSouth Communications, Inc. My net credited service date is July 29, 1963. I have been asked about allegations involving my ethics in my district. Specifically, about a letter in which I am accused of instructing my subordinates to back date contracts so that I could earn bonus dollars from the Company's third quarter sales program. The third quarter sales bonus program was called the third quarter "push." This was a Florida program, not a Company wide program. The program began July 1, 1992 and completed September 30, 1992. It was based on attainment of 35% of adjusted annual revenue objectives during the third quarter. Account Executives, system designers and Service Consultants were eligible. This was the first incentive program for the non-management Service Consultants this year. The Service Consultants were tied to Account Executives and in some cases, They were tied to the primary group they support. Service Consultants that attained their objective were awarded \$400 Service Merchandise gift certificates - Account Executives, Regional Account Managers, Support Managers, and Systems Designers that attained their objective were awarded \$750. Sales Managers and Support Managers that attained their objectives received \$1000. The Regional Sales Manager, myself, would have been awarded \$1500 if I had attained the objective. I did not receive this award as I was 92.93% of the objective. On July 1, 1992, the revenue objective was raised in Florida \$13 million. This was spread out among the various districts and passed down to the Account Executives. These revised objectives were used in calculating the third quarter objectives. My increased district objective was approximately \$2 million dollars. When an Account Executive makes a sale he or she gives it to a Service Consultant for implementation. The Service Consultant prepares the necessary documents and gives it to the business office for order issuance.

49

A SCN, Sales Compensation Number, is placed on the order by the Service Representative. This number is what allows our Compensation Program to work. Our Compensation staff matches the SCN numbers that my administrative support group submits, to the SCN numbers from actual service orders that have been issued by the business office. This is my understanding of the process. My RSM assistant, in provide you with a much more detailed explanation of SCN*numbers and service order process if you so desire. The third quarter sales push was not a product specific sales bonus plan. It was a total revenue plan, Award checks would have been included in the October payout which would have arrived in November. Contracts in the sale of Network services are really confirmation of tariff provisions. For example, Megalink, Synchronet, ESSX, use a contract to confirm the customer's commitment to a period of time that service will be installed. The contract states the period of subscription, the order date and the terms and conditions as specified in the tariff for the particular service. Not all Network services are contractual. For example, you can have an ESSX that is month to month. This is not contractual. Trunks, Watsavers, and in some cases Synchronet, are not contractual. The services are sold, the orders issued by the business office and compensation paid. Some of our orders go to the ISC depending upon the complexity. They would issue the order and put the SCN on it. CPE system sales always require a contract. They are legal documents with very strict guidelines. We have an exception to the firm order policy provision. This is used when the customer has to have the system ordered prior to obtaining signatures on a contract because the customer's legal department must review the contract. We will not turn the system up, until we have the signed contract. In the compensation system, we put a hold flag. No one is paid compensation until all documentation is received, including the contract. The sales person only gets paid after the documentation is received. The Network Sales contract must be signed prior to the service being installed. However, the sale can be put into the system prior to the signed contract. procedure on Network sales involving a contract should be identical to that used for CPE contractual services. Over the last 3-4 years we have held training sessions in my district regarding the contract service procedures. I have never instructed anyone in my organization to falsify any document, to back date any document, or to do anything else which would result in unwarranted personal gain. And to the contrary, I have many times, individually and in group meetings covered my employees very strongly on the importance of exercising full integrity on each sales transaction. As a matter of fact, at the end of May 1992, at a district meeting 48 involving my offices, with

in attendance, I covered and insisted that they follow firm order policy and give written order confirmation to their customer on every sale. I told them it was professional business and the

-8-

even remarked at this meeting that right thing to do. he agreed with what I had said and told the employee group he (sic) nothing to add. The only incident that I recall regarding back dating of a contract occurred during the 3rd quarter sales push. made an integrated System sale to The sale included Megalink. came to the sales job in January 1, 1992 from being a in the Business Communication Center. She made the sale September 25, 1992. Due to the complexity of the sale and the fact that orders were back logged as installation personnel were loaned to the Hurricane Andrew restoration project, the orders were delayed getting into the system. ISC would not input into the system until all critical dates could be established. went to her s, and appealed for credit for this sale as part or the third quarter push bonus program since she sold the service in September. went to discuss the validity of the appeal. told give me the contract.

contract. joes back to and she asked what contract.

dvised that she did not know a contract was required for megalink.

went to her customer with a contract. She appeal to him that she did not know that a contract. was required and asked him to sign and date the contract the date he agreed to purchase, September 25, 1992. This occurred sometime 26 around October 15, 1992.

27 me going through myself, and 'discussed the matter on a 28 F 29 conference call. On that call I advised both even though the sale was made in September I would not allow it to count for the third quarter push bonus because the sale did not appear in the final sales listing for the month of September. This decision was consistent with the way we treated Account Executives throughout the state. The sales counted only if they appeared in July, August or September's final sales listings obtained from the compensation system. This is the only knowledge I have of back dating contracts. I have explained why we did not allow this sale 30 to count for the contest to who in turn explained it to . Neither one of them liked it but they understood the basis for my decision. By the way, if the sale had counted for them it would have counted for me too. As you were previously told, I did not receive the bonus from the third quarter sales push. 43 instructed to cover all employees once again on all contract services and the proper procedures for handling those transactions in early 1993. If you desire to interview any of my people regarding the allegations against me, I welcome it. If you decide to interview anyone, I would request you interview everyone. If there is one thing that I pride myself on, it is integrity. I practice and preach, do the right thing.

-9-

I have read the above handwritten 10 page statement and it is true. I have signed and dated each page and initialed all corrections.

Signed:
Dec. 18, 1992
9:45AM

Disposition

No further investigation is anticipated at this time.

Closed

Interniew Log -

Began : 8-45 Am Cended: 9:16 Am

place: 500 n. Orange av, Ren 164

Haven Hove

ERL#"

3

May 20, 1993 8:50 Am

Dage 106/

, make this Kee and villentary statement to starre who has identified himself to me as a stoff Mangery Security representing Bell South Communications, Int. I einderstand that the statement may be used. as evidence. I have been asked about my knowledge regarding anyone folsely reporting sales lack. dotting contracts, brien anyway folsely elporting Sales to achieve sales commission of to qualify for the various sales award programs. I have no denowledge of anyone doing the In fait, our compensation Oppragram is lossed upon orders being in the system not contract dates. The order application date is what drives compensation payatte. No one has Over asked or encouraged me to chart backdote contracts or in anyman. paleoely 22 resist -alls, irelading I has been made very clear to myself and my co-workers that only the order policy. This requires short all proper garge work alcompany the order expect request ropics is outwitted to gustoner Services. They input the order and this is the driver of the System. I in our companiation manager. The receiver a copy of the contract, service agreement, the, and maintains a moster file. 31 system. F03B36Z 0000191 have read the above statement and

Saterview Log-

5-14-93

Regan - 8:50 Am Inded - 9:24 Am

5 place -

Conference room

in attendance: Harren Hore

F03B36Z 0000192

F103-05084A-22

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May 14, 1993

" 8.50 AM maye 10/2

Statement to Name Dove, who has identified himself it one as a Stoff Manager- Security representing Bell Soft Communications Inc. & linderstand that this statement may be used o an oxidence. I am employed as an I with Bell South Communications I have been an account execution for mere years. I have been asked about they prowledge regarding backdating contracts, Ithat have no knowledge of anyone doing that ouch and have never been instructed took such o my Regional Soles Manager, any elaborate check in the system prior to Companiation being awarded. There is an extremely strong prophesis on being ethical and advising our customers with confirmation letters, of products purchasel, cost, dottof activation as well as thanking then for their order. In addition the district has a compensation person that cheeks orders and ensure proper compensation is rendered. In addition, had quarter also for a compensation person to check the status of comparation issues. In 1992, we had a 3rd quarter Push program. I did not get the enough as I was at 97.5790 of objective, I had some orders

F03B36Z 0000193

5/14/95 @ 4-20am FN03-05084A-23

for that did not get in the Dister or complete by the contest's deadline.

asked " " " " " " Regional Sales Manager, "

in opening of include the Hending of the Science of the Sending of asked " towards the Push Salds award program. supplied by the cortest deadling they do not 9 Court towards the contest. Es a result missed the award as Junas 97.570% Shis is an example of the strong emphasis the department husban ethical behavior. My situation, I can not remember the estet details now, was not really an ethical question because there were reasons why Athe so did not ever want the appearance Einstructed to backdate contracts or in anyway cheat on reporting my sales. I have read the above statement and it is true. I have dated and squel each page each page and mitaled all corrections

2φ

5/14/93 @ 9.20 am

26

Interview Log -

5-14-97

Began: 8:00 Am Ended: 8:45 Am

Place:

Confesence 100m

Haven Dore

F03B36Z 0000195

FM63-05084A-2C

May 14, 1993

page 1052

datement to Storie Dove, who has identified himself to me as a Stoff Manager- Security representing Rellant Communications, I.v. I understand that this statement may be used as evidence I am employed by Bell South Communications, Inc. in I have been 2 a sales manager since 1978. There been asked about 12 my benowledge regarding instructions from my superiors, green or debery to backdote contracts or foldely misnepresent soler in any monner to allow regard of my to allow award programs such as the 3rd frutter 1992 Soles bush program. I have no knowledge of anyone falsely reporting sales or 16 Nach dating Contracts for service agreements. Q Gother and drive any benefit. Dur entre Compensation system and Solles award programs for service order being input into the system: There are premero sofeguade that
consir place to Kerty orders are are the system
prior to generating compensation. CPE sales utility.
Contracte bowever, copies are filled maintained
and cheelsed for accuracy. Again the sale or CPE is calculated lased upon when seguice order are input into the LAN system EC 31 that so componation is paid with they are in the system. No one welliding Bill shalley has ever instructed me to witness: share Fore 36 8: YJAm C-14-93 Staff Manyer- Security FUNZ- NYORYA- 21 8140 AM

have sales people backdate contracts, of soles, or in anyway unethically report sales. The operate in a full disclosure sales environment explaining all features and benefits to our custometer. He are fully expected and do maintain high integrity and ethical available of any improprietary and ethical fire the sperson immediately. There is the total for wrethical wehavior.

that and the above two page and dated and regued each page and initially any and all corrections.

17 witness

Staff Manager - Security

5-14-93 8:40 AM

Interview dog -

5-13-93

Bogan: 1:40pm Ended: 2:07pm

Place: Security Porfered

in attendance: Staven Hove

F03B36Z 0000198

F1103-15084A-18

 \langle

May 13, 1993 1:50 pm page 10/2

5 Q 🏸 make this free and Voluntary statement to starren Dove, who has identified himself As me as a Staff Managh - Security representing Bell-South Communications Inc. Quaderstand that this statement may be used as evidence I am employed by Bellouth Communications, Inc. as a have been in 2 Que, as a this capacity for some five year diving Come to this position 1989 from advanced Systems. I have been asked about my Snowledge of any unethical sales reporting, checking or manipulating results to Contests. I have no benowledge of anyone cheating, back dating contracts or placely reporting Sales to enfluence companiation 30 gearter sales puch program. Our compensation and soles award programs are lased upon order in the system.

26

F03B36Z 0000199

May 13,1993 Dias PM.

F403-05084A-19

There are checks and tolorees to ensure the appropriate paperwork is submitted to me and the other Sales wonagers. Contracts on CPE sales also covered me and go to a "clearing house", a CPE Coordinator to weiff proper documentation. My supervisor is

instructed or given any directions to me or anyone like to do anything unethical or dishorest. I have no knowledge of management ever encouraging this and I know it would not be tolerated. In fact, we recently dismissed an account executive over generationable.

A have read the drive tens page statement and jet in tour. I have signed each stage.

23

May 13. 1898 7:45 f.M.

F03B36Z 0000200

Laterview Log Date: May 12, 1993

Bogan: Ended: Place:

3:30pm 4:15pm Security office

in attendance: Harren

8

5-12-93

F03B36Z 0000201

May 12, 1993 4pm

page 1052

Voluntary statement to starren some, who has identified himself to me as a Staff Manager- Security representing Bell South Communications, Inc. I undicated that this statement may be used as evidence. I am employed they Bell South Communications Inc. I as a Sale Manager I have been asked obout my browledge of management encouraging palse sales reporting and or back datery to that I have sales contact awards to be attained I have never been asked or told they anyone including

report or manipulate soller in anyway. The opportunity really does not exist as our sales compensation programs are driver by order being placed into the customer services order septem. The do have aggressive soler contests, powever, the parameters or the material are

Nancolore Security 5-12-93

5-12-53 F03B36Z 0000202

4:10P2 FNO3-0.10844-17

Jagl. 20/2 Very defined and other rules and igulation Of the contest are adhered to with no deviations. Regardless of contract signature date, sales and evaluated on the date stey are input cents the service order system, not by the contract signing dotte. Last year, we had 3 rd quarter Sales program called Of anyway to cheat and have no Invowledge of anyone cheating, backdoting Contracts or ephlody reporting palls, & did make Other Objective, 109.0%. Owar at the stime for Mayor accounts an support of John. Hutchinson's Siles group and received \$1,000. My epperiences wort my 14 is that his regard factities horesty, and accountability is second to nove, He demands it at all times I have read the above 2 page statement It is true I have dated of signed each some of

F03B36Z 00002

36

-12-93 4:10 px 3

april 28, 1993 9:06 Am

page 1

make this free and voluntary of the statement to I varient sove and relson shorten who have identified themselves the me as staff of Managers- Security representing I Bell South Communications I was I understand that this statement may be used as enidence. I am employed by Bell South Communications, and work one as an include the supervisor is cust Padgett.

3 At 1000 537. My supervisor is cust Padgett.

5 1. I have been asked about may warry was sold. I have rever been told by encourage

WATS-AVEN Sales. I have never been Hold by encouraged to check, falsely report sales, or do any short cuts, to obtain sales results by any managener employee, are convolver. I have never been been told to back date contracts or place unauthorize services or customes.

to the sales force that he expects ethical sales behavior meaning no attrop cheating or false sales reporting will be Hoderated. I have never engaged in any false sales reporting or placed services on customer decounts without their authorization of have not deceived any customers in my sales efforts and have calkered to high

Short cuts or any fraudulent reporting of sales. Not only its wrong morally and ethically, but overeld cost mesmer with as well as

tresi Harendone 5 Stoff myr-Security 7 4-28-43 10:17 AM N. Fran 7 40 ... 1822 R=96%

07-15-93 02:06PM P017 #09

put the company at risk. In fact, in early March 1993, I do not brecall the exect date, I was scheduled for an audit of my balla practices and procedures.

The spect date is or my colondar in

me rese and in available if reedal:

from the Dampa office and a

staff person, female & do hot remember

helprome, carme to our office and met

with me in the fifth floor conference conducting myself with customers, methods used in sales protices, tools wood in proposals, documentation operales, and initial customer approach and followers
where discussed. Spacific discussion of
how I was selling WATSAVER and information
De was providing on the confirmation Settlers
20 was discussed It asked for and secured 1 come of oney WATTAVER Colfination letter. efforts in staro areas. The first was how was conducting myself in salls practices and the second how a was taking the efter ellast in do more work than the ivere days. I Althing wir about my Volunted efforts, speakers bureau. Divide de programa 30 a shood yourteer programing community community and helping out forth company community with what was doing. He did not give me specific feedbagle on my letter. I had 35 to leave at James for an appointment at spin. I spined that company or Member 1,16. 4 20/12 10:45 MM. 28-53 101.17 Am

I began selling after completing my trainings in January 9942, the second week. I sold WATS Aven and ETSX service - e did not sand confirmation letter for water saver Carda D did send a letter outlining to bought the service of sent at thank you card. In may 1992, e remember Stituding " a Dustrict Continue ? to that account executives in atlanta were being diamessed from the Company because thou had installed WHT THER and pervices on customer accounts without ever tell, was he required his district to be totally ethical in all rates activity and would not tolerate dishonesty - The toldies to always followupor all services sold with confirmation eletters. I do not recall the exact details of what he said a prestud meeting held in However, in - Hotel the confirmation eletters should contain other the services bought, the cost and when 29 the services or for product would retirated. Prior to this conferen would to my confirma specific cost, not the delivation date. I changed my letter after this January to conference to Include 4/20/93 10:95 MM my security 71 eles. 70 ... P.

'03B36Z 000020

37

R=96%

07-15-93 02:06PM POIG HOD

. 2

the fact that I approached then, discussed Sta pervice with the and they states tragreed to dake the service. To o was secured. I redid my WAT toep. confirmation letter at the lend of as a model confirmation letter. I added an additional paragraph to include where I discussed the service with they and they approved the service. My letter otated tetter confirms our convenation of or (specificate) and confirms your approve 14 our discussion." The letter does not specify 15 he activation data for those customers 16 that did och I did tell them the next villing circle was the activation date. I am autorential nine customers have said that they did not authorize the service for recall deteroring the service. This number is really only light as one Of these has been readired. The Elistoner, complaint has been resolved. I sent the Confirmation iletter to the wrong person as dethired in my letter of april 9, 1993 dat all the customers, they gust do not reall giving me autho WATS AVER. Some of were made in person via West others were made oran the Confusion on othe part of customers is that I never said that they "persechased"

Nathaner. I Hold them that trusted F03B36Z 0000207 9/20/92 10:46 stm

their monthly upage analysis they are qualified for their optional calling plan. march 1893 the upon austioned. water, a discussed sense to get on the plan Horne audified for letter space they change . I as thorough my Inethal used in it I delive the foo I take the exter minutes to 10:46 HM

senderstanding that they had approved this plan. On March 18, 1943, I wan covered on Soles Practices and Procedures regarding WATSaver service. I signed A memorandum from documenting my coverage. They confirmation letters and the same today and in I pever assumed a sold the customer always gave me authorination. I am dumb foliaded as to while B clistomers for WAT saver. I sold the service the Derect same was to those customers that I was thorough and authorized the plan and whenhappy with the service. Khy would I send confirmation eletter to bustoners that dies not authoring the plan? I did not change mer as or salls the mique. Shese other cleatomer letter. To conferred bell the certo and felt I had the authorization to bustall INATS aver. an example, is 76 I was there twice, the first 27 stine to discuss WATSAVER, time Memory Call. He told me he was surprised that Southern Bell would

34

4/20/97

send someone out to discussionis

business and save him money. He was in favor of it so a installed it Dikever Said "purchase", but I

35 told him to meded his verbal

2 authorizations & said if it would save her morely, he was in favor of it. I had the service installs and sent Elle sonfirmation letter. he was already of the plan before.

I have never installed any service without securing customer approval.

I can distinguish the difference between upes or # 10. This is 12 overwhelming to... imparted the tegrible to have mener Cowpromised my thies to do anythms To defraud the company I have Company in the most positive was possible always with integ I have READ THE AROVE 7 page blomb withen statement and abo is true. I have Duted the signed Each page and initral all corrections.

23

4/28/43 10:45 AM

Wilson Zhounder Stay Manager - Security 4-24-93 10:50 AM withins: Warren Derre Staff Monager-Security 428-93 10:51 AM

K=82X

March 29, 1993

MEMORANDUM

To: File

FROM: Varren Dove, Staff Manager-Security

5 Subject

Regional Sales Manager Pile: FN03-05084

Pursuant to a ruquest by Vice President Corporate Compliance.

John Gunter, this case is being reopened to conduct followup interviews of Account Executives in Orlando and in Jacksonville. The anonymous allegation that instructed his Account Executives to beok date contracts to qualify for the 1992 third quarter cales award program, stated that numerous Account Executives and Administrative managers would collaborate this allegation. A decision was made not to interview any Account Executives or Administrative Managers during the previous investigation. Hr. Gunter requested that some be interviewed to ensure a thorough investigation of the allegation.

Open and assign FN03-05084A with a study bubble of 45 to the writer. Investigation pending.

F03B36Z 0000211

MEMORANDUM

February 24, 1993

To:

Sheree Largin

Assistant Staff Manager

From:

Mario Martinez

General Security Manager

Re:

Employee Reporting Line Incident Report

Number 93-2-9

Sheree, the above captioned report was received in the Fort Lauderdale Security office on February 19; 1993. Employee Defalcation case 3-5102 has been opened and assigned to Larry 1. Meeker, Staff Manager Security.

F03B36Z 0000212

700 /700 t

VAA ***** A.

$PAGE _ / OF _ 3$
EMPLOYER REPORTING LINE INCIDENT REPORT
STAFF OFFICE REFERENCE NUMBER 93-2-9
DATE 2/19/93 TIME 9:10 2M. RECEIVED BY Darlene Vines
FULL NAME OF PERSON MAKING REPORT: (nonymous)
JOR TITLE: 2
DEPARTMENT: Netwark
LOCATION:
CONTACT NUMBER:
NATURE OF CALL: Caller had just attended an ethics meeting with
his supervisor and he along with other technicians question ethic
standards in the way the Maintenance Center personnel dispatch
service orders and troubles.
The Mtnce. Ctr. juggles figures just to get rid of the
stuff quickly. The service orders have to be dispatched by 5:00
(See next page)
SUBJECT INFORMATION:
FULL NAME(S):_
DEPARTMENT:
LOCATION:
PHONE NUMBER:
SUPERVISOR:
HOW DID COMPLAINANT ACQUIRE INFORMATION
•
REFERRED TO: Mario Martinez AREA: JL
REFERRED TO: Tharis Martinez AREA: FL
DATE: 2/19/93 TIME: 11:05 a.m.

page 2 of 3

EMPLOYEE REPORTING LINE INCIDENT REPORT 93-2-9

NATURE OF CALL (CONTINUED):

The troubles they take are on a 24 hour clock. The MA's will hold them if they are real busy and dispatch to the Technicians at 5:00pm and there is no way a technician can do it then. This is widespread with MA's and all outside technicians have encountered this. One more thing the MAs do is when they get, backed up, they will call the customer and ask the customer if they can do their job the next day or so. The caller said he didn't understand all the details of the PSC Tariff when a customer reports phone, but he didn't think this is the way it was set up with the PSC.

Most of the outside technicians there are 23-25 years with the Company and nobody tries harder to be more ethical with the customer. The Company preaches ethics and the customer just continues to get jerked around. The MAs don't care. They are covered once the order is dispatched. Sometimes the customer gets re-scheduled 2 - 3 times. MAs are really bad when they try and convince the customer that their trouble is in the phone or equipment so they don't have to dispatch. Sometimes the customer gets two or three phones but the trouble is in the outside line.

in our Company. When the technician is given something at a quarter of 5pm, their supervisor will just say "No access it", or they send a technician a 4 hour service order at 4:00 pm and it's just "No access it". The outside technician is the one that has to meet eye to eye with the customer.

F03B36Z 0000214

EMPLOYEE REPORTING LINE INCIDENT REPORT 93-2-9

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it	dispat	ched, t	hey don	't care	when.			<u>-</u>		
	Ca	aller sa	id serv	ice ord	lers sh	ould not	have	e a 5	:00 p	m
com	mitment								•	
	Cal	ller say	s our c	ompany	is not	ethical	in o	our b	usine	ss
tac	tics.	There j	ust has	to be	a poin	where	you :	stop	lying	to
the	custon	er. Th	e Compa	ny talk	s about	tethics	but	we s	hould	hav
hon	esty ar	nd ethic	s to ha	ve Qual	ity. '	ve need	qual:	ity.		•
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07-14-93 D2:11PM FRON SOUTHERN BEEL 3

TO ME COX

P001/001

July 12, 1993

MEMORANDUM

TO:

MG. DARLIENS VINGS, ASSISTANT STAFF MAMAGER-SECURITY

PROK:

X. PHAGAN

RE: EMPLOYER REPORTING LINE INCIDENT REPORT

MUNBER 93-03-13

FL 04-5055

As of this date, provisions are being made to petition the Florida Public Service Commission regarding the existing tariffs related to charges for service temporarily suspended. Difficulty exists in that predivestiture tariff language provided essentially for billing at one-half the monthly rate, which would include optional features. At divestiture, tariffs were reissued in bulk and approved by the Commission. However, the language in this particular section was changed to show one-half the monthly access rate, which would be interpreted by most as one-half the basic lfR rate.

Company Attorneys and Regulatory are addressing the matter and expect resolution shortly. We will continue to follow up on this matter on a monthly basis and inform you of the final outcome.

MP: rr

Pls Far to Darlow.

F03B36Z 0000216



Mario C. Martinez General Security Manager Southeast Florida Area 3

Suite 1021 6451 N. Federal Highway Ft. Lauderdale, Florida 33308 305 492-3530

June 21, 1993

Mr. R. W. O'Neill Vice President and General Counsel 2003 Campanile 1155 Peachtree Street Atlanta, Georgia 30346

Mr. M. E. Cox Director-Security 600 North 19th Street 8th Floor Birmingham, Alabama 35203

Dear Mr. O'Neill and Mr. Cox:

RE:

10

COMPLAINANTS

LEGAL MATTERS FL 04-05055

On June 1, 1993, Mr. Marshall Criser, Operations Manager, and Mario Martinez, General Security Manager, discussed the tariff issue regarding this case.

Mr. Criser indicated that he believed the tariff was properly worded and that possibly it was misinterpreted in the Service Representatives Handbook.

Mr. Criser agreed to discuss this matter further with Mr. W. G. Dresser's office to obtain a satisfactory resolution.

Our files have been marked for follow-up on July 1, 1993. We will advise of this matter's resolution when it becomes available.

Yours very truly,

General Security Manager

MCM:rr

B.S.T. Security Headquarters

JUN 23 1993

Birmingham, Ala.



6451 N. Federal Highway

Ft. Lauderdale, Florida 33308

Suite 1021

305 492-3530

Southern Bell

Mario C. Martinez General Security Manager Southeast Florida Area

May 17, 1993

Mr. W. G. Dresser General Manager-Marketing-Cust. Contact... 301 West Bay Street

Room 20EE1

Jacksonville, Florida

Mr. R. W. O'Neill Vice President and General Counsel 2003 Campanile 1155 Peachtree St. N.E. Atlanta, Georgia

Mr. J. L. Nault, II General Attorney 675 W. Peachtree Street Room 4300 675 W. Peachtree Street Atlanta, Georgia

Gentlemen:

Mr. A. M. Lombardo Assistant Vice President-Regulatory & External Affairs 150 S. Monroe Street Room 400 Tallahassee, Florida

Mr. M. E. Cox Director-Security 600 North 19th Street 8th Floor Birmingham, Alabama

> B.S.T. Security Headquarters MAY 26 1993 Birmingham, Ala.

Re:

71 22

26

LEGAL MATTERS FL 04-05055

Reference also Security investigation (FL 13-05198) from mid-March of this year in which an Employee Reporting Line Incident Report (93-3-13) questioning Company policy as related to temporary suspension of service. As per the Service Representative Handbook, we were quoting the suspension monthly rate as being one-half the monthly rate to include normal charges for Custom Calling features, etc.

COMPLAINANTS

Mr. Dresser's response indicated the inquiry was referred to Headquarters, Mr. Lloyd Nault, Legal, and Mr. A. M. Lombardo, Assistant Vice President-Regulatory, since the matter involved the entire Company. The concensus of opinion indicated the situation was not considered a matter of ethics but of customer service. The recommendation was that the tariff wording be changed to reflect the suspend service rate be one-half the monthly 1FR rate, rather than one-half the monthly rate.

The matter has surfaced again this date, in that a subscriber,

questioned:

Representative, as to the minimum monthly cost to suspend her
telephone service temporarily while retaining her telephone number.

The costs were quoted as per the Service Representative's Handbook,

a discussion ensued, and the matter referrred to

Assistant Manager-Customer Services.

The customer questioned as to suspending service on her advised hat a class action suit could be filed against Southern Bell for failing to fully disclose this information.

The customer, who was calling from appeared to be somewhat satisfied in that we would suspend charges for all features as well. It is not our intention to interview either

this time. The service is listed and billed This may in fact aggravate the situation or demonstrate undue interest in light of the fact tariff changes are being considered at this time. We will, however, be guided by your imput.

I have attached a copy of Security's closing correspondence for file 13-05198 and Employee Reporting Line Incident Report number 93-3-13 for your review.

Please refer any questions you may have to Mike Phagan on (305) 492-3536.

Yours very truly,

Mario C. Martinez

General Security Manager

MP:ds

Attachments

March 30, 1993

Mr. Larry Mixon
Operations ManagerMarketing-Customer Contact
2021 South Military Trail
Room 121
West Palm Beach, Florida

Dear Mr. Mixon:

9 Re:

10

EMPLOYEE REPORTING LINE INCIDENT REPORT NUMBER 93-3-13 MISCELLANEOUS INVESTIGATION FL 13-05198

On March 18, 1993, the Southeast Area Security Office was asked to investigate an Employee Reporting Line Referral in which

questioned the Company's suspend service practice. Specifically, we suspend service at one-half the monthly rate including one-half the rate for optional features as well. The customer could in fact disconnect these features, and not be billed for the options. When service is restored, the features could again be added on the same service order at no additional cost.

This matter was researched and referred to Mr. Bill Dresser, General Manager-Customer Services, who recognized that the situation affected the entire Company, and not just the State of Florida. Lloyd Nault, General Attorney, has been consulted by Mr. Dresser, and correspondence directed to Mr. A. M. Lombardo, Assistant Vice President-Regulatory, with the recommendation that tariff wording be changed so that instead of reading "one-half the monthly rate" (includes features) it would read "one-half of the applicable 1FR rate". This would preclude the Service Representative having to disconnect and reconnect features as well as network time, negotiation time with the customers, and Comptrollers' time. It is believed this could be accomplished with a program change, and would have a minimal impact on forecasted revenues.

The situation is not considered an ethical breach as we were operating within the confines of the tariff.

F03B36Z 0000220

135798-17h

7 Please relate to the appreciation of this office as well as higher management for her concern.

Any questions you may have should be referred to my office at 492-3536.

Yours, truly,

Mike Phagan Manager-Security

MP:ds

bcc: Darlene Vines

page of 2
EMPLOYEE REPORTING LINE INCIDENT REPORT
STAFF OFFICE REFERENCE NUMBER 93-3-13
DATE 3/18/95 TIME 4: 10 pm. RECEIVED BY Darlone Vined
FULL NAME OF PRESON MAKING REPORT
JOB TITLE:
DEPARTMENT:
LOCATION
CONTACT NUMBER:
MATURE OF CALL: Caller feels we have a practice
that needs to bellooked into: When
customer requestes their service be suspended
they are required to pay half their
monthly rate, but we don't tell them
they (can) suspend their optional festure
SUBJECT INFORMATION:
FULL MAKE(8):
DEPARTMENT:
LOCATION:
PHONE NUMBER:
EUPERVISOR:
HOW DID COMPLAINANT ACQUIRE INFORMATION
REFERRED TO: MATTING AREA: FL
DATE: 3/18/93 TIME: 5:20 pm
TIME: U. ZU PARO

F03B36Z 0000222

PAGE 2 OF 2

STAFF OFFICE REFERENCE NUMBER 93 - 3-/3

	MATURE OF CALL (CONTINUED):
	as well, such as call waiting, touck-tone,
	ceta.
	They have a lot of customers who get
	their telephones on Vacation because a
	Lat of customers line there 6 mos out of
	the Oyear and relsewhere the other O
	6 months. This got my attention last.
	6 months. This got my attention last summer."
13	have brought their und fredome in
	group- meeting that it sites of me
	group- meetings, but it gets passed over. She feels this is not a full
	disclesure to the customer Dand. "this
	could be a lawsuit pending."
18	- Lasked it she tin forbidden
	to give this option to customer). The sail
	no, but if she were monitored she
	yearn't sure how it would be
	lasked upon.
23	
	but she rich she in in an autonomous
**	work group.

F03B36Z 0000223

by and miked have by the hours

March 30, 1993

To:

Darlene Vines

Assistant Staff Manager

♠ From:

Mike Phagan

Manager-Security/Southeast Florida

⊬ Re:

COMPLAINANT

EMPLOYEE REPORTING LINE INCIDENT REPORT

NUMBER 93-3-13

MISCELLANEOUS INVESTIGATION

FL 13-05198

Captioned report was investigated by the Southeast Florida Security Office, and is summarized in the attached closing correspondence to Mr. Larry Mixon.

If additional information is needed, please don't hesitate to call 305-492-3536.

MP:ds

Attachment

Med to Mr. O Neill 4-6 March 30, 1993

Mr. Larry Mixon
Operations ManagerMarketing-Customer Contact
2021 South Military Trail
Room 121
West Palm Beach, Florida

Dear Mr. Mixon:

Re:

EMPLOYEE REPORTING LINE INCIDENT REPORT NUMBER 93-3-13 MISCELLANEOUS INVESTIGATION FL 13-05198

On March 18, 1993, the Southeast Area Security Office was asked to investigate an Employee Reporting Line Referral in which

questioned the Company's suspend service practice. Specifically, we suspend service at one-half the monthly rate including one-half the rate for optional features as well. The customer could in fact disconnect these features, and not be billed for the options. When service is restored, the features could again be added on the same service order at no additional cost.

This matter was researched and referred to Mr. Bill Dresser, General Manager-Customer Services, who recognized that the situation affected the entire Company, and not just the State of Florida. Lloyd Nault, General Attorney, has been consulted by Mr. Dresser, and correspondence directed to Mr. A. M. Lombardo, Assistant Vice President-Regulatory, with the recommendation that tariff wording be changed so that instead of reading "one-half the monthly rate" (includes features) it would read "one-half of the applicable 1FR rate". This would preclude the Service Representative having to disconnect and reconnect features as well as network time, negotiation time with the customers, and Comptrollers' time. It is believed this could be accomplished with a program change, and would have a minimal impact on forecasted revenues.

The situation is not considered an ethical breach as we were operating within the confines of the tariff.

Please relate to the appreciation of this office as well as higher management for her concern.

Any questions you may have should be referred to my office at 492-3536.

Yours truly,

Mike Phagan

Manager-Security

MP:ds

bcc: Darlene Vines

	1		
PAGE		OF	_2

EMPLOYEE REPORTING LINE INCIDENT REPORT

	STAFF OFFICE REFERENCE NUMBER 93-3-13
	DATE 3/18/93 TIME 4: 10pm. RECEIVED BY Darline Vined
5	FULL NAME OF PERSON MAKING REPORT
þ	JOB TITLE:
7	DEPARTMENT
ર્જ	LOCATION:
9	CONTACT NUMBER:
	NATURE OF CALL: Caller feels we have a practice
	that needs to be blooked into: When
	customer requests their service be suspended
	they are required to pay half their
	monthly rated but we don't tell them
	they can suspend their optional features
	SUBJECT INFORMATION:
17	FULL NAME(S):
	DEPARTMENT:
	LOCATION:
	PHONE NUMBER:
	SUPERVISOR:
	HOW DID COMPLAINANT ACQUIRE INFORMATION
•	
	REFERRED TO: Marting AREA: FL
	DATE: 3/18/93 0 TIME: 5:20 pm

EMPLOYEE REPORTING LINE INCIDENT REPORT STAFF OFFICE REFERENCE NUMBER 93-3-13

	NATURE OF CALL (CONTINUED):
	as well, such as call waiting, touck-tone,
	etc.
	They have a lot of customers who put
	They have a lot of customers who put their telephones on Vacation Lecause a
	lot of customers line there 6 mos out of
	the Oursel and relocustore the other
	6 months. "This got my attention last-
	summer)."
3	has brought this up before in
	has brought this up before in group- meetings, but it gets passed over. She feels this is not a full
	She feels this is not a full
	disclosure to the customer band this
	could be a lawsuit pending."
E	Could be a lawsuit pending." Lasked if she vis forbidden to give this option to customer . She sail
	to give this option to customer . The sail
	no, but if she were monitored she
	wasn't sure how it would be
	looked upon.
3	I asked for her supernisors name
, * -	Laskel for her supervisors name but she said she is in an autonomous
	work group.

June 1, 1993

To:

File .

From:

Mike Phagan, Manager-Security

4 Re:

5

LAINANTS

LEGAL MATTERS

Q

EMPLOYER REPORTING LINE INCIDENT REPORT

NUMBER 93-3-13

MISCELLANEOUS INVESTIGATION

FL 13-05198

On this date, M. C. Martinez, General Security Manager, was questioned by Marshall Criser, Operations Manager, regarding tariff vs. the Service Representative Handbook, language Accordingly, Criser informed Martinez that the tariff shows "one half the access line rate" which would actually equate to one half the IFR monthly rate. Since this information was provided to Security by W. G. Dresser, General Manager-Marketing, Criser will discuss with him.

MP:ds

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Markell Crises + Ma Durseis

office. Crease behaves tainff

office. Crease behaves to handbook

wash of heat Surre Rip handbook

may be muskeastig. He was to

Coordinate wette Purseis office.

For a resolutions.

MILLE F03B36Z 0000229

ERL#93-3-13

TUNE SUPPOSERS PELL winn:cu ck-ft-lu

170/7101

TIME WIR AT

• *: •

May 17 1993.

Meno Jo Mem Le Wil

7 ON this date ?

8 Adused That subscriber

9 with Service Representative The requestes minimum cost to suspend her telaphone service sad retain her telephone number. She was quoted 12

The wormer rate. Leter questioning him forther 13 she was referred to who handled the 14 care. Second somewhat upset in that she

ans not informed up front That she could annel according

rate for basic service. She mentioned A CIRES,

Action Suf is set did not Dully disclose This

INFORMATION.

obscassed ack who who was righted this in the past. The mother was referred to security and

the Pele Noted.

24 The Account is Lested & Gilled

Reference des 13-5198

EKL # 93-3-13

4 floor

Ola gen

03-14-83 05:00Pm rkom southekn bell

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NOTE:

May 24, 1993

233456

7 Dear

g subject: 🖫

MISCELLANEOUS INVESTIGATION SEC: FILE: FN13-05422

1) On March 29, 1993, the? security group received an anonymous report via the Employee Reporting Line reflecting that a major business customer had been afforded rearrangement work without the benefit of a service order being received by RCMAC prior to the work being completed. The caller reported that a Service Consultant had requested the work and had followed the request with a letter to a local RCMAC "manager" indicating that formal service orders would follow in two to three weeks. original rearrangements for the customer were reported to have taken place on March 18, 1993, and as of the date of the anonymous report, no service order activity had been initiated. The caller indicated that any service order discrepancies could have an adverse impact on possible audits conducted by Government agencies. Further, the source of the report felt that changes in Company practices and procedures should be made to prevent such occurrences. Finally, the caller indicated concern with respect to those responsible for issuing service orders; such as Marketing Representatives, Service Representatives, and Service Consultants.

No identification of the orders or business account was provided by the source of the complaint.

3 Inquiries made with

and

1993, reflected no specifics on the major customer or the service 34 orders in question stated that orders were sometimes worked

prior to due dates as a matter of Company convenience and efficiency. He was unaware of any complaints brought to his attention in that regard.

On March 7, 1993, the identity of the customer was ascertained as

The original request to
was also found. With
the correspondence dated March 12. 1993, and directed to
The request detailed the work

To be performed relative to

A pending service order, was to account for
change for station, due dated
3-18-93. The remaining stations were to be moved accordingly on
April 2, 1993, with other associated stations transferred via
service orders on April 30, 1993. The request was initiated by

Investigation in the RCMAC group showed the three for to have been transferred without accompanying service orders on March 29, 1993, and caused a customer report according to ______ The stations were regrouped to 29 their original ______ on March 29, 1993, at approximately 10:55AM.

30 On May 11, 1993, provided Security with a detailed chronology of service activity associated 32 with during the period March 2, 1993 through May 7, 1993. She indicated that the requested movement of the three original numbers was in conjunction with an upcoming 35 conversion of scheduled for May 7, 1993. Those orders were completed as scheduled on May 7th at approximately 6:00PM.

Our investigation has not shown any effort to circumvent proper 3% billing to or intentionally issue work without accompanying service order backup. A great deal of customer interface occurred during the course of this conversion and with the installation of an associated synchronet circuit.

-3-

Some audit confusion could arise as a result of the procedures currently in place, with partial completions being a source of concern.

Documentary evidence gained as a result of this investigation is available for review upon request. No further investigatory effort is being undertaken.

Any questions should be directed to me /at 904-350-2883, in Jacksonville.

Yours very truly,

General Security Manager

North Florida Area

CJP:pw

2 93-2-10 I Security Case FN 10-05064 (CWD) closed, no disposition received from the department. 5 93-3-10 Security Case FN 21-5012 (CJP); open, investigation pending. ^દ 93−3−11 Security Case FN 10-5065 (CAP) open, investigation pending. 93-3-21 Security Case FN $13^{\frac{1}{2}}05422$ (CJP) closed, no disposition received from department. 93-4-11 Work Activity ET's -Security Case FN 03-05122 (CJP) open, investigation pending. 17 93-5-1 Security Case FN 10-05075 (EWR) closed, no disposition received from department. (Governor's Award) -Zo 93-5-11 Security Case FN 10-05076 (CJP) closed, no disposition received from department. 23 93-5-14 - -----Security Case FN 13-05437 (CJP closed, no disposition received from department. 24 93-5-20 A THE RESERVE AND THE PROPERTY OF THE PROPERTY Security Case FN 13-05435 (CJP) closed, no disposition received from department.

Z 93-2-10 Security Case FN 10-05064 closed but no disposition received from the department. 5 93-2-11 Security Case FN 03-05094 closed 4-6-93. Warning entry placed in file. 93-3-10 Security Case FN 21-5012 open, investigation pending. g - San Alley (sp. 1888) and see a second 93~3-11 Constitution of the Consti Security Case FN 10-5065 open, investigation pending. The second second section of the section of the second section of the section Execution to the second 17 93-3-21 Security Case FN 13-05422 closed, no disposition received from department. 15 93-3-24 The state of the s Security Case FN 10-05067 closed and a clearance taken. 17 93-4-10 Security Case FN 16-05024 closed and contract guard resigned. Work Activity ET's in 20 93-4-11 Investigation is pending. 22 93-5-1 Security Case FN 10-05075 closed but no disposition received from department.

2 10-6 Investigation pending. A C. September 1 March 1994 12-2 93-1-1 Security Case FN 10-05056 closed 1-29-93. Employee received warning. 93-2-4 Security Case FN 10-05063 closed 3-4-93. received informal counseling. Employes 93-2-5 Security Case FN 21-05009 closed 3-31-93. Disposition from department pending. 14/ 93-2-11 Security Case FN: 03-05094 closed 4-6-93. Disposition from department pending. 17 93-3-10 Security Case FN 21-5012 open, investigation pending. 19 93-3-11 Security Case FN 10-5065 open, investigation pending. 1 21 93-3-21 Security Case FN 13-05422 open, investigation pending. 73 93-3-24 Security Case FN 10-05067 open, investigation pending. ---**25 93-3-26** Security Office Referred to 24 handling.

04-30-93 03:51PM P003 #12

ULL NAME OF PERSON MAKING REPORT: Anonymous OB TITLE: EPARTMENT: OCCATION: ONTACT NUMBER: ATURE OF CALL: Caller is concerned with precedures on She said who had a service Concerting a major- Customers customer with Sou Bell, She chang Customers lawipment, The letter was written the manager of In her letter she UBJECT INFORMATION: FULL NAME (S): DEPARTMENT: DEPARTMENT:	STAFF OFFICE REFERENCE NUMBER 93-3-21 ATE 3/29/93 TIME 11:10 s.m. RECEIVED BY Darlenc Vines OULL NAME OF PERSON MAKING REPORT: Anonymorus OUS TITLE: EPARTMENT: OUTTACT NUMBER: ATURE OF CALL: Callen is concerned with pracedures on She said whe had a somice Consultant write a letter concerning a major- Gustomess customer with Sou Bell. She Chang Customess lawipment, The letter was written the manager of Uniformation: FULL NAME (5): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:		PAGE $_{-}$ OF $_{-}$
ULL NAME OF PERSON MAKING REPORT: Anonymous OB TITLE: EPARTMENT: OCCATION: ONTACT NUMBER: ATURE OF CALL: Caller is concerned with pracedures in She said who had, a service Concultant wite, a letter concerning a major- Gustomers customer with Sou Bell, She Chang Customers laujament, The letter was written the manager of In her letter she UBJECT INFORMATION: FULL NAME (S): DEFARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	ULL NAME OF PERSON MAKING REPORT: Anonymous OB TITLE: EPARTMENT: OCCATION: ONTACT NUMBER: ATURE OF CALL: Caller is concerned with pracedures in She said who had, a service Concultant wite, a letter concerning a major- Gustomers customer with Sou Bell, She Chang Customers laujament, The letter was written the manager of In her letter she UBJECT INFORMATION: FULL NAME (S): DEFARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	EMPLOYEE REPORTING LINE INCID	ENT REPORT
DEPARTMENT: COCATION: CONTACT NUMBER: CONTACT NUMBER: CONTACT NUMBER: Consultant Curite a Letter Concerning a major: Consultant Curite a Letter Concerning a major: Customers Customer with Sou. Bell, She change Customers Cycipment, The Letter was written the manager of In her Letter she. CUSTOMERS CUSTOMENTION: FULL NAME (5): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	FULL NAME OF PERSON MAKING REPORT: Anonymous FOR TITLE: DEPARTMENT: A CONCERNED With procedures SONTACT NUMBER: SONTACT N	STAFF OFFICE REFERENCE NUMBER 93-3	3-21
DEPARTMENT: Subject in the said is concerned with procedures with south and a service concurred the said is he had a service concurring a major. Consultant write, a letter concerning a major. Customers customer with sou. Bell, she change customers equipment. The letter was written the manager of subject information: Full Name(s): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	DEPARTMENT: Subject in the said of some subject information: Consultant survive a letter concerning a major. Consultant survive, a letter concerning a major. Customers superposent, The letter was written to the manager of subject information: Full Name(s): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:		
CONTACT NUMBER: NATURE OF CALL: Caller is concerned with procedures. She raid whe had a service Consultant turite, a letter concerning a major. Customers customer with Sou Bell, She chang Customers laujament. The letter was juritten to the manager of In her letter she Subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	DEPARTMENT: COCATION: CONTACT NUMBER: NATURE OF CALL: Caller is concerned with pracedures in She said whe had a service Consultant. Turte, a letter concerning a major. Consultant. Turte, a letter concerning a major. Customers customer with Sou. Bell, She chang customers equipment, The letter was written the manager of In her letter she. SUBJECT INFORMATION: FULL NAME (5): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	ull name of person making report: Unon	ymous
CONTACT NUMBER: NATURE OF CALL: Caller is concerned with procedures. She said whe had a service Consultant turite a letter concerning a major. Customers customer with Sou Bell, She chang Customers laujament. The letter was juritten to the manager of In her letter she Subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	CONTACT NUMBER: NATURE OF CALL: Caller is concerned with procedures in She said whe had a survice Concerning a major. Consultant. Write, a Letter Concerning a major. Customers customer with Sou. Bell, She Chang Customers equipment, The letter was written the manager of In her letter she subject information: FULL NAME (5): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	OB TITLE:	/
NATURE OF CALL: Caller is concerned with procedures in She said whe had a service Concerning a major - Consultant. Write, a letter concerning a major - Gusiness customer with Sou. Bell, She Chang Customer's equipment. The letter was written the manager of In her letter she subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	NATURE OF CALL: Caller is concerned with procedures in She said whe had a service Concerning a major - Consultant. Write, a letter concerning a major - Gusiness customer with Sou. Bell, She Chang Customer's equipment. The letter was written the manager of In her letter she subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:		
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She said whe had a service Consultant Turite, a letter Concerning a major Customer's customer with Sou. Bell, She chang Customer's equipment, The letter was written the manager of In her letter she SUBJECT INFORMATION: FULL NAME (S): LOCATION: PHONE NUMBER: SUPERVISOR:	Consultant. Write, a Letter Concerning a major. Customers Customer with Sou. Bell, She change Customers equipment, The Letter was written the manager of In her letter she subject information: FULL NAME (S):_ DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	ATTIPE OF CALL: Callan in Comme	with market
Consultant Turite, a letter concerning a major- Crisiness Customer with Sou. Bell. She Chang Customer's Laurement. The letter was ruritlen to the manager of In her letter she Subject information: FULL NAME (S):	Consultant. Write, a letter concerning a major- Cristmess Customer with Sou. Bell, She chang Customers equipment, The letter was written to the manager of all her letter she subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	in She raid who has	l a service
Customers customer with Sou. Bell, She change customers equipment, The letter was written to the manager of all her letter she subject information: FULL NAME (S): DEPARTMENT: LOCATION: PHONE NUMBER:	Customers customer with Sou. Bell, She Change Customers equipment, The Setter was written to the manager of In her Setter she subject information: FULL NAME (S):_ DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:		
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the manager of subject information: FULL NAME(S):_ DEPARTMENT:_ LOCATION: PHONE NUMBER:_ SUPERVISOR:_ In her letter she. In her letter she.	the manager of In her letter she subject information: FULL NAME(S):_ DEPARTMENT:_ LOCATION: PHONE NUMBER:_ SUPERVISOR:	customer's canisment, The let	- 71
FULL NAME(S):_ DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	FULL NAME(S):_ DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:		h 0 . 1
DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	DEPARTMENT: LOCATION: PHONE NUMBER: SUPERVISOR:	UBJECT INFORMATION:	
LOCATION: PHONE NUMBER: SUPERVISOR:	LOCATION: PHONE NUMBER: SUPERVISOR:	FULL NAME(S):_	- - -
PHONE NUMBER: SUPERVISOR: 4	PHONE NUMBER: SUPERVISOR:	DEPARTMENT:	· · · · · · · · · · · · · · · · · · ·
SUPERVISOR:	SUPERVISOR:	LOCATION:	
SUPERVISOR:	SUPERVISOR:	PHONE NUMBER:	
	HOW DID COMPLAINANT ACQUIRE INFORMATION O CONTINUEN	• • • • • • • • • • • • • • • • • • • •	leagn tie')
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	Α .	EFERRED TO: M. Martines A	REA: /-L
REFERRED TO: M. Martinez AREA: FL	REFERRED TO: M. Martinez AREA: FL		

EMPLOYEE REPORTING LINE INCIDENT REPORT STAFF OFFICE REFERENCE NUMBER 93-3-2/

NATURE OF CALL (CONTINUED):
wanted changes made and said in 2 or 3
weeks from now who would visue a
service order to change. That was
March 18 and a service order still has;
not been written.
The caller is concerned if attorney General
sulled account and asked to look at -
Service order they wouldn't match. She feels this needs to be changed in practices I've procedures. She is concerned with
Leels this needs to be changed in practices
De procedures, She is concerned with
Marketing Reps, Service Reps and Service
Consultants
•

Rech from 5=11-9300000 UMAL

MAY 11, 1993

TO: JODY PETTY SECURITY

FROM:

· RE:

7 & 9

> 31 32

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10

PER YOUR REQUEST, THE FOLLOWING IS WHAT TRANSPIRED FOR THIS CUSTOMER FROM MARCH 2, THRU MAY 7, 1993:

7, 7

13 : 14 15	3/2/93	RECEIVED REQUEST FOR	
<u>:</u> 16	3/9/93	SERVICE CONSULTANT OF CONFIRMATION TO CUSTOMER.	NT LETTER
18	3/12/93	SERVICE CONSULTANT PAXED REQUEST TO 1	
20 20	3/15/93	FOUR INSTALLED - ; CIRCUIT ID 1 THRU .4.	·
22 23 24	3/12/93	TWO CIRCUT II: CIRC	UIT ID
25 26 27 28	3/18/93	ORIGINAL DUE DATE FOR	
2.7 30			F03B3

F03B36Z 0000241

ERL # 93-3-21

FND13-05422-3

2	3/19/93	CUSTOMER REQUESTED DUE DATE CHANGE FOR ABOVE TO 3/25/93. PROJECT AND SERVICE ORDERS UPDATED TO REFLECT DUE DATE CHANGE.
5 6	3/22/93	CONFIRMED WITH THAT HAS BEEN MOVED
7	3/25/93	SERVICE ORDERS FOR COMPLETE.
9	3/29/93	RECEIVED CALL FROM CUSTOMER THAT STATIONS HAD BEEN MOVED BACK TO OLD CLD
11	3/30/93	RECEIVED CONFIRMATION FROM THAT HAVE BEEN RETURNED TO 1
13	4/26/93	RECEIVED REQUEST FROM CUSTOMER TO TRANSFER REMAINING
15 16	4/27/93	ISSUED
17 18	5/4/93	SERVICE ORDERS ISSUED FOR
19 70	5/7/93	IN MY ABSENCE - RECEIVED CONFIR- MATION FROM 1 THAT SERVICE ORDERS FOR 1 WOULD BE PROGRAMMED AT 6:00 PM AS ORIGINALLY SCHEDULED.
		SERVICE ORDERS WORKED AT 6:00 PM.

PLEASE SEE ATTACHED CORRESPONDENCE AND IF I CAN BE OF FURTHER ASSISTANCE, I CAN BE REACHED AT

07-15-93 01:15PM		TO 912053216	6876 P003/023
SERVICE ORDER #		15	
3 5	7	. 9 3 12	. 6 12 3
7	*	3 6	, 3
	BOVE DUE ON 3.	/18/93	,
13 NYG2L422	· - · · · - · · · · · · · · · · · · · ·	Ú DUE 3/15/93	3/16
16 NYG2L419	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	OUR 3/15/93 OUR 3/15/93	3/12
• • • • •		į.	

March 9, 1993

· 234

Dear

Per our coversation this afternoon, enclosed is a copy of the

I am also enclosing a list of service order numbers, billing ID's and miscellaneous billing numbers for your

If additional information is needed, feel free to call me at

Sincerely,

15

10

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XPOI F.A. CKL 2 080 CLS/TN USOC FNR NAR CFA MIS # TYPE SVC 8 10 11 51 13 9 14 10 15 11

CHANNEL SERVICE REQUEST FORM to be provided by Marketing)

Page 4 of

NOVEMBER,

F03B36Z 0000245

P006 #06

96%

1992

S

TO-112053216876

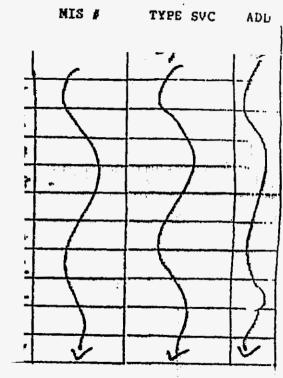
P004/023

ADL

MIS #

XPOI

F.A. CLS/TN DID CKL 2 USOC FNR NAR CFA 13 14 16



25 26 F03B36Z 0000Z46

CI ARREL SERVICE REQUEST FORK to be provided by Marketing) 3 Page 5 of 5 20 mg A E (904) CLS/TH CKL 2 USOC FKR HAR CFA KIS ¢ TYPE SVC 3 TO 912053216876 5 6 789 10 11 P016/623

Dr.

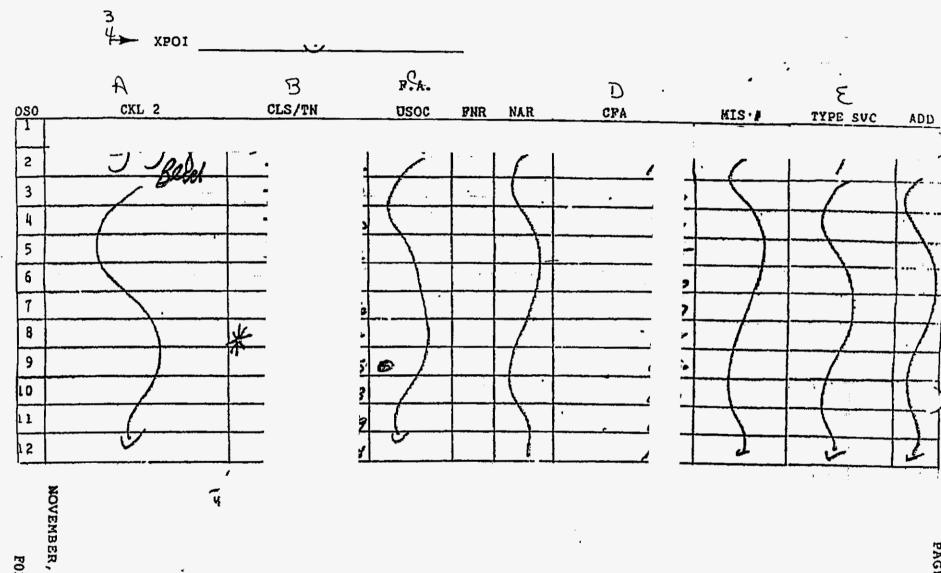
7

FEBLUARY, F03B36Z 0000247 11 CI ANNEL SERVICE REQUEST FORM to be provided by Karketing)

Page 5 of ___

RA. B TYPE SVC CLS/TK usoc CKL 2 CFA PHR NAR DSO MIS # 10-9120**532**16876 19 20 21 22 23

FEBUUARY, 199



CHANNEL SERVICE REQUEST FORM to be provided by Marketing)

Page 4 of

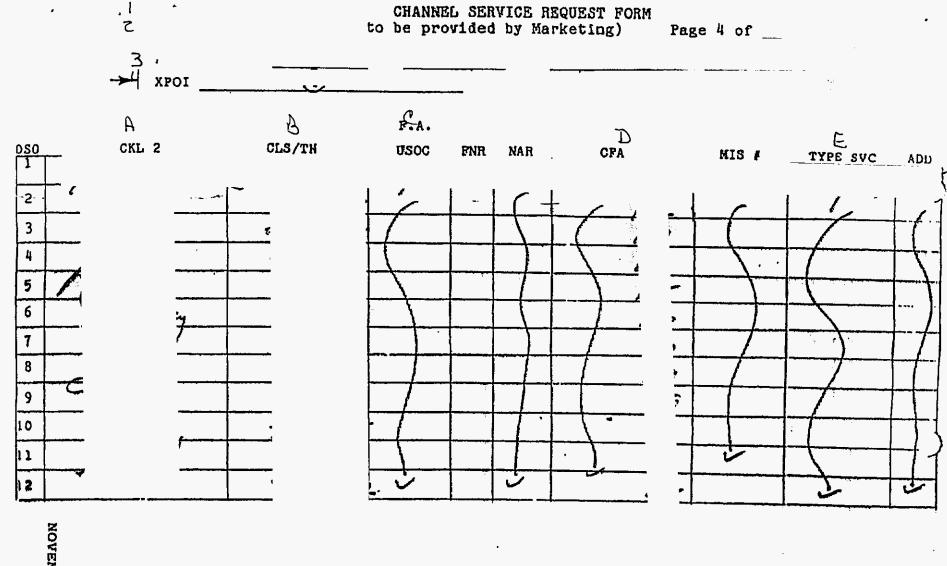
F03B36Z 0000249

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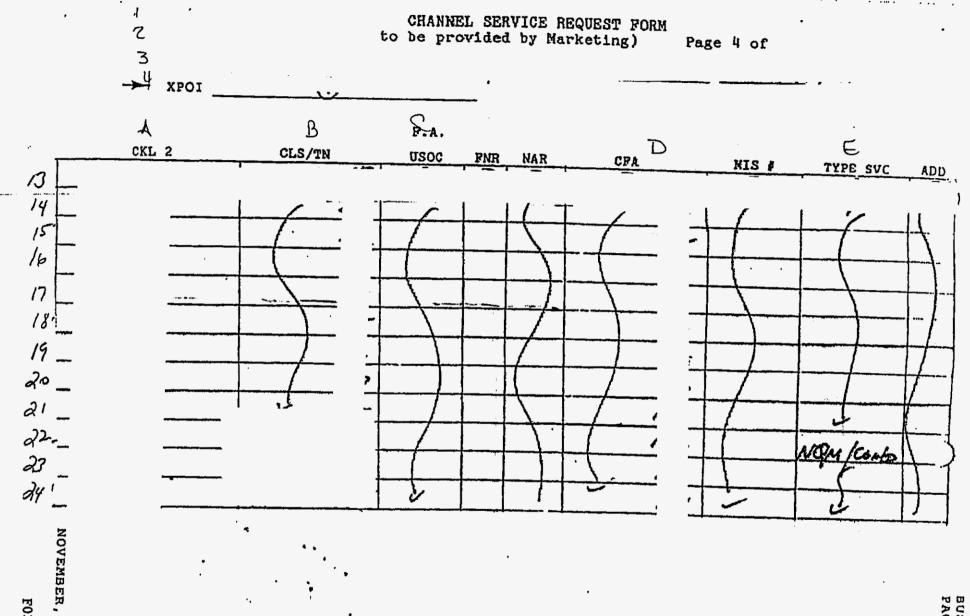
*****96**%**



NOVEMBER, 1992

F03B36Z 0000251

%36**-**3



3ER, 1992 F03B36Z 0000252

DATE:	7	193	
MESSAGE TO:		•	1.
FACSIMILE (FAX) #:			·
ROOH #:			
TELEPHONE :		· · · · · · · · · · · · · · · · · · ·	
LOCATION:			
			_
HESSAGE FROM:			
DEPARTMENT:			
ROOM NUMBER:	O'.		
TELEPHONE #:			
	 :		
SPECIAL INSTRUCTIONS:			
		Artacle S	Der CAR Consters
this a, m.	1		
-			
	,	PA III	

#500 P01



April 26, 1993

Southern Bell

7

Please arrange to transfer our remaining number ranges from billing group to the new k billing group k This cutover is to occur at 18:00 hours eastern time Friday, May 7, 1993. It is imperative that this change is not made before 18:00 hours on May 7, 1993.

13 The number ranges to be transferred are as follows:

19 15 1

Please advise status of this order as soon as possible.

Sincerely,

. | 21

Project Leader

173 cc:

SBT

03-19-93 G3:55 PM

3/19 @ 2:55 is

GET THE FAX FROM

FAX NBR

904 358-1011

PLEASE HAND DELIVER

COVER PLUS

SHEET(s)

If copy is not clear, please call as soon as possible!

n Number

JAGE FROM

ISC

er name:

MN IF REQUIRED

, – **"**

F03B36Z 0000255

OTES:

07-15-93 12:10PM POIR #06

MHR-02-193 TUE 17:46 LIVEUTE FINANCIAL SERVES FAX:

#137 PØ1



March 2, 1993

Dear Mr.

11

12

1:3

15

Please place the following orders for Please advise order numbers and due date confirmation.

⇒ service.

r

Re: newly ordered

services ordered:

Order 4

Order

Order to be terminated on above channels due March 15, 1993.

Order to be terminated on above channels on April 2, 1993 after 6:00 pm. This due date is CRITICAL and must be worked on this date and time. Please advise names and contact numbers for after hours cutover personnel.

Please call if you have any questions. I can be reached at . (Digital Pager).

Sincerely,

Project Leader

Maro Parione Not year 100

TRANSMISSION REPORT

 $\{\{f_{i,k,k}\}_{i=1}^{k}$

A

FAX NO.

RECEIVER ID

DATE AND TIME

DURATION

TYPE

PAGE

RESULT

F03B36Z 0000258

12:10PM

Mir

MARCH 12, 1993

3/29 Program 42.62

RE:

13 DEAR

٦٢.

4 THIS SERVES TO CONFTRM OUR CONVERSATION RE

L PLEASE MOVE FROM EXISTING ROUTE INDEX TO NEW
ON 3/18/93; THERE IS A PENDING SERVICE ORDER (
ESTABLISHING ABOVE NEW ROUTE INDEX, TCC ETC., DUE ON 3 18 93.

ARE TO BE MOVED TO ABOVE RTI, TCC, ETC., ON APRIL 2, 1993, AT 6:00 P.M.; REMAINING DID STATIONS WILL BE MOVED ON APRIL 30; 1993, VIA SERVICE ORDERS.

WE DO APPRECIATE YOUR ASSISTANCE AS ABOVE DATES ARE VERY CRITICAL AND MUST BE WORKED ON GIVEN DATES AND TIME.

IF THERE ARE ANY QUESTIONS, PLEASE CALL ME AT SINCERELY,

Lenawing or 8147, 1999 47. 600 Pm

--- MEMORANDUM WORKSHEET

FOR DAY OF CUT

CUSTOMER NAME/DDD:	· ·
PROJECT NUMBER:	
CENTRAL OFFICE:	
SERVICE CONSULTANT:	· · · · · · · · · · · · · · · · · ·
TELEPHONE NUMBER:	
ALL NEW TELEPHONE NUMBERS AND OF FRAME PRIOR TO THE DDD.	SS SHOULD BE PREPROGRAMMED AND WIRED ON THE
1. THE FOLLOWING TELEPHONE NUMBER PROGRAMMED AS INDICATED.	BERS ARE BEING REUSED AND SHOULD BE
TELEPHONE NUMBERS:	
TIME OF DAY TO PROGRAM INTO	COMMON BLOCK:
2. THE FOLLOWING IS A LIST OF I PROJECT. PLRASE WORK THEM A	AND/OR F ORDERS ASSOCIATED WITH THIS AS INDICATED:
ORDER NUMBERS:	START TIME:
কৈ	6:00 Pm 5/7/93
2)	6:00 Pm 5/7/93 6:00 Pm 5/7/93
· · · · · · · · · · · · · · · · · · ·	<u> </u>
!	
REFERENCE OF CALL SHEET PROVIDED	
	Block of Stations an
4 baing added a	- oxisting Block &
ark bein	added to Existing
26	<u> </u>
Die-ho N_S885	

DURATION TYPE PAGE RESULT

TAX NO. RECE: VER 10 DATE AND TIME

ac of class of upos # 1 PA 1 PA 1 #

TRANSMISSION REPORT

F03B36Z 0000261

-96%

07-15-07 19-10PM P099 HO

MARCH 12, 1993

DEAR.

THIS SERVES TO CONFIRM OUR CONVERSATION RE

PLBASE MOVE PROM EXISTING ROUTE INDEX TO NEW ON 3/18/93; THERE IS A PENDING SERVICE ORDER BETABLISHING ABOVE NEW ROUTE INDEX. TCC RTC... DUE ON

STATIONS ARE TO BE MOVED TO ABOVE RTI, TCC, 1993, AT 6:00 P.M.; REMAINING DID STATIONS WILL ETC., ON APRIL 2, BE MOVED ON APRIL 30, 1993, VIA SERVICE ORDERS.

WE DO APPRECIATE YOUR ASSISTANCE AS ABOVE DATES ARE VERY CRITICAL AND MUST BE WORKED ON GIVEN DATES AND TIME.

IF THERE ARE ANY QUESTIONS, PLEASE CALL ME AT

GENCHARANS.

May 24, 1993

MEMORANDUM:

TO: GSM - PREAU

FROM: SM-S STRINGER

RE:

13

117

17

19

21734

FILE: FN10-05067

Reference is made to the Employee Reporting Line Incident Report dated March 31, 1993, regarding the captioned employee.

On April 23, 1993, contact was made

regarding the allegations made against was requested to conduct diagnostic observations of to determine if her sales of optional services involved any Ethic violations.

On May 21, 1993, this writer met with and developed the following:

During the period of April 23, 1993 and May 1, 1993, there were forty-six diagnostic observations conducted on by six Assistant Manager's, located in the and Florida, area. There were no observations conducted by immediate Supervisor. There were no Ethic's violation's observed. A procedural weakness was identified concerning full disclosure in connection with optional services, i.e., Full disclosure requirements as listed in the Service Representative's Handbook, Disclosure Statement Section, page 8, May 7, 1993, are as follows:

- 1) Clearly communicate to customers the optional nature of each optional service that is recommended or ordered.
- 2) Provide a clear description of each optional service recommended or ordered.

- 3) Provide the rate charged for each optional service recommended not required to obtain basic telephone service.
- 4) Make sure the customer understands that optional services are not required to obtain basic telephone service.
- 5) Make sure the customer understands that optional services can be canceled at any time without a cancellation charge.
- Of the forty-six observations, there were four contacts which involved discussion with the customer about Calling Cards. In each case obtained customer agreement to send Calling Cards to the customer, however, full disclosure requirements were not consistently met.
- 12 The diagnostic observation records will be maintained by
- On May 24, 1993, advised that an informal discussion would be held with to re-cover her on the Attorney General Settlement requirements of full disclosure in connection with the recommendations on sale of optional services.

CC: Darlene Vines

mort for their more the commissional consequence and assessment of the commissional consequence of the consequence and the consequence of the cons 10-6 Investigation pending. 3 12-2 93-1-1 Security Case FN 10-05056 closed 1-29-93. Employee received warning. 7 93-2-4 Security Case FN 10-05063 closed 3-4-93. received informal counseling. 10 93-2-5 Security Case FN 21-05009 closed 3-31-93. Disposition from department pending. 13 93-2-11 Security Case FN 03-05094 closed 4-6-93. Disposition from department pending. 16 93-3-10 Security Case FN 21-5012 open, investigation pending. 18 93-3-11 Security Case FN 10-5065 open, investigation pending. 20 93-3-21 Security Case FN 13-05422 open, investigation pending. 22 93-3-24 Security Case FN 10-05067 open, investigation pending. 93-3-26 South Florida Security Office Referred to Miami. handling.

04-30-93 03:51PM P003 #12

93-2-10

Security Case FN 10-05064 closed but no disposition received from the department.

µ 93-2-11

Security Case FN 03-05094 closed 4-6-93. Warning entry placed in file.

) 93-3-10

Security Case FN 21-5012 open, investigation pending.

93-3-11

Security Case FN 10-5065 open, investigation pending.

93-3-21

Security Case FN 13-05422 closed, no disposition received from department.

14/93-3-24

Security Case FN 10-05067 closed and a clearance taken.

/6 93-4-10

Security Case FN 16-05024 closed and contract guard resigned.

/9 93-4-11

Investigation is pending.

والأراز والمتدرية ووجودورون

and the statement of the first of the first

J/ 93-5-1

Security Case FN 10-05075 closed but no disposition received from department.

·	PAGE $\underline{\hspace{1cm}}$ OF $\underline{\hspace{1cm}}$
EMPLOYEE REPORTING	G LINE INCIDENT REPORT
STAFF OFFICE REFERENCE NO	IMBER 93-3-24
DATE 3/3//93 TIME 2:55 pm	RECEIVED BY Darlen Vines
FULL NAME OF PERSON MAKING REPO	DRT: (Inammous)
JOB TITLE:	
DEPARTMENT:	
LOCATION:	
CONTACT NUMBER:	
NATURE OF CALL: CALLA IDAL	il she visia service rep
	her of (another service
	, //
seption advising co	. 1
10	will be sending them a
1 //	. tello the customer it i
free. She never a	ske the customer if the
SUBJECT INFORMATION:	• 0
FULL NAME(S):	· · · · · · · · · · · · · · · · · · ·
DEPARTMENT:	<u> </u>
LOCATION:	ပ
	//
PHONE NUMBER:	
SUPERVISOR: 6	
HOW DID COMPLAINANT ACQUIRE INF	FORMATION OUSERVACTION
	•
À.	
REFERRED TO: Prease	area: FN
DATE: 3/3//93	TIME: 3:15 p.m.
DATE	

EMPLOYEE REPORTING LINE INCIDENT REPORT STAFF OFFICE REFERENCE NUMBER 93-3-24

	NATURE OF CALL (CONTINUED):	
	Grould like to have one	
	We were re-covered two weeks ago	
	and we were adrised the must left	ain
	it is an option. She refuses to change	e).
29	The service sep is	
30	The caller spelled & spelled	
31	but she said she was not s	ures
	of the Correct spelling of last name.	
	•	
**		
		•
		<u>.</u>
•		

MHK-02-193 FUE 17:46 TH: CHC FINANCIAL SERVES FAX NO: 19041727-4191

#137 P01



March 2, 1993

Dear Mr.

745678

ŀ

17.

Please place the following orders for Please advise order numbers and due date confirmation.

Re: newly ordered

ordered:

Trunks.

to be terminated on above Order

due March 15, 1993.

to be terminated on above Order on April 2, 1993 after 6:00 pm. This due date is CRITICAL and must be worked on this date and time. advise names and contact numbers for after hours cutover personnel.

I can be reached at . Please call if you have any questions. (Digital Pager).

Sincerely,

Project Leader

(LAND CARLORD NOT ME CARTION

3.393

TRANSMISSION REPORT

6 A %

FAX NO.
RECRIVER ID
DATE AND TIME
DURATION
TYPE
FAGE

one in the facility and one of the facility of

9 97 12

M

MARCH 12, 1993

3/29

wiew

Program

727- 4292

RE:

DEAR

90

21

23 23 THIS SERVES TO CONFIRM OUR CONVERSATION RE

PLEASE MOVE FROM EXISTING ROUTE INDEX TO :
ON 3/18/93; THERE IS A PENDING SERVICE ORDER

ESTABLISHING ABOVE NEW ROUTE INDEX, TCC ETC., DUE ON 3 18 93.

STATIONS

ARE TO BE MOVED TO ABOVE RTI, TCC, ETC., ON APRIL 2, 1993, AT 6:00 P.M.; REMAINING DID STATIONS WILL BE MOVED ON APRIL 30, 1993, VIA SERVICE ORDERS.

WE DO APPRECIATE YOUR ASSISTANCE AS ABOVE DATES ARE VERY CRITICAL AND MUST BE WORKED ON GIVEN DATES AND TIME.

IF THERE ARE ANY QUESTIONS, PLEASE CALL ME

Sincereky,

SERVICE CONSULTANT.

Levising or 8147, 1993 gt. 600 p.

---- MEMORANDUM WORKSHEET

FOR DAY OF CUT

CUSTOMER NAME/DDD:	<u> </u>
PROJECT NUMBER:	
CENTRAL OFFICE:	<u>, </u>
	/
SERVICE CONSULTANT:	·
TELEPHONE NUMBER:	
	•
ALL NEW TELEPHONE NUMBERS AND OBS SHOULE FRAME PRIOR TO THE DDD.	LD BE PREPROGRAMMED AND WIRED ON THE
1. THE FOLLOWING TELEPHONE NUMBERS ARE PROGRAMMED AS INDICATED.	
TELEPHONE NUMBERS:	
TELEPHONE NUMBERS: (IF NECESSARY TIME OF DAY TO PROGRAM INTO COMMON	BLOCK:
2. THE FOLLOWING IS A LIST OF D AND/OR PROJECT. PLRASE WORK THEM AS INDIC	
ORDER NUMBERS: STAR	TIME:
8:	6:01 Pm 5/7/93
9 -	6:00 Pm 5/7/93 6:00 Pm 5/7/93
	6: W PM 5/7/97
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REFERENCE OF CALL SHEET PROVIDED TO ALS	S-DATE:
	1)
2 baing added ad ac	Min. Block &
3. ark bein adde	2) to Existing
34	
RM:be N-S885	•
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F03B36Z 0000273

TRANSMISSION REPORT

RECE: VER 1D
DATE AND TIME
DURATION
TYPE
PAGE
RESULT

FAX NO.

MARCH 12, 1993

RB:

DEAR.

THIS SERVES TO CONFIRM OUR CONVERSATION RE

STATIONS

PLEASE MOVE PROM EXISTING ROUTE INDEX TO NEW ON 3/18/93; THERE IS A PENDING SERVICE ORDER ESTABLISHING ABOVE NEW ROUTH INDEX

STATIONS ARE TO BE MOVED TO ABOVE ON APRIL 2, 1993, AT 6:00 P.M.; REMAINING STATIONS WILL BE MOVED ON APRIL 30, 1993, VIA SERVICE ORDERS.

WE DO APPRECIATE YOUR ASSISTANCE AS ABOVE DATES ARE VERY CRITICAL AND MUST BE WORKED ON GIVEN DATES AND TIME.

1 if there are any Questions, please call me at

Sincerely.

F03B36Z 0000274

93 12:10PM P023 #06

n-07%

April 29, 1993

Dear

RE: EMPLOYEE REPORTING LINE COMPLAINT #93-4-8

was received from employee,

was told by her
incorrect charge of \$11.00 appeared on her April telephone bill for
a calling plan that she had no knowledge of and did not request.

being aware of past sales issues with customers, referred
the incident to the employee reporting line. It was later

On April 21, 1993, an Employee Reporting Line Incident complaint

the incident to the employee reporting line. It was later developed that the calling plan in question was SAVER SERVICE and the date of activation was March 2, 1993. The incident was referred to for investigation.

The customer, when contacted, requested to not be interviewed personally about the incident and said the report provided by her sister was accurate. The customer requested that her account be corrected to reflect the removal of SAVER SERVICE.

The victim's records in BOCRIS were accessed and the employee issuing the order establishing the SAVER SERVICE on March 2, 1993 was ascertained. That employee,

was interviewed on May 4, 1993, about recollection of the order establishing the SAVER SERVICE for the 32-customer. Could not recall the customer or the specific order establishing SAVER SERVICE, but after reviewing the victim's subscriber records, he said it appeared to be his order based on his employee serial number being present on the order.

36 Stated that as a selling company features is part of his job, and SAVER SERVICE, as he now

"Restricted BellSouth Security Information"

understands it, is an item that would be a sales opportunity and 2 therefore measured on. therefore measured on. I said he has offered SAVER SERVICE to customers who would benefit by having, but in reviewing the captioned customer's account, no long distance history was evident where SAVER SERVICE would benefit the customer.

said he is not under any pressure to sell and is not aware of any improper sales activities as they apply to customers, and furthermore would never participate in any unethical sales activity.

was aware of the sales issues involving customers where items were sold to them without their knowledge and activity. said this situation was unrelated,

12 supervisor, when contacted about the investigation, said that SAVER 131 SERVICE is a revenue item for the company and Service 'S Representatives do receive individual sales credit. 'said didn't report to her when the credit policy began in January 1, 1992, and therefore was unable to explain why was not aware of the sale credit policy.

The customer was satisfied with the attention paid to this situation and was provided with Booker's number for future reference as needed. ; made the necessary adjustments to the customer's account and as such this investigation will be concluded with this correspondence. Should you have any questions or concerns, contact Hampton Booker at 305-263-3111.

Very truly yours.

General Security Manager

HGB: mro

cc: M. E. Cox

"Restricted BellSouth Security Information"

	PAGE/ OF
	EMPLOYEE REPORTING LINE INCIDENT REPORT
	STAFF OFFICE REFERENCE NUMBER 93-4-8
	DATE 4/21/93 TIME 1:15 pm., RECEIVED BY Darlen Vines
7	FULL NAME OF PERSON MAKING REPORT
	JOB TITLE:
	DEPARTMENT:
7	LOCATION:
?	CONTACT NUMBER:
	NATURE OF CALL: Her isister received him telephone bill
0	and there was an incorrect charge of #11.00
	thought it was a charge for "Calling Plan:
	Her sister called the Bs. Ofc. 4 they Wid. take the charge
3	this because there could be a pattern to this and
	SUBJECT INFORMATION:
	FULL NAME (S): Unknown
	DEPARTMENT:
	LOCATION:
	PHONE NUMBER:
	SUPERVISOR:
	HOW DID COMPLAINANT ACQUIRE INFORMATION
•	
	REFERRED TO: Martines AREA: FM
	referred to: <u>Martines</u> AREA: <u>FM</u> DATE: <u>4/21/9.3</u> TIME: 3:15 pm
	· · · · · · · · · · · · · · · · · · ·

page 2 of 2

EMPLOYEE REPORTING LINE INCIDENT REPORT

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June 30, 1993

MEMORANDUM:

TO:

11

MR. M. E. COX, DIRECTOR-SECURITY,

FROM:

JAMES L. PREAU, GENERAL SECURITY MANAGER

SUBJECT:

MISCELLANEOUS INVESTIGATION

FILE: FN-13-05433

EMPLOYEE REPORTING LINE #: 93-5-21

On May 25, 1993, an Employee Reporting Line referral reflected miscoding of a service order assigned to a . Florida resident. The reporting employee stated that a "MA" (missed appointment) status had been applied to the order and that an unethical situation existed inasmuch as the reason for the missed appointment was listed as "CF" (Company facilities).

The coding procedure and the question of statusing missed appointments was referred via letter to the office of Ted C. Kellermann, Jr., Director-Administration (Network Operations-South) for resolution. In a reply dated June 25, 1993, Kellermann indicated that coding associated with the missed appointment was correct and in order. The due date was not met, and because of the reasons for the missed order (a wet splicing module), the reason was detailed in the remark section as "CF", or Company facilities.

Traditionally, the fact that the order was not completed on the due date afforded the customer, constitutes a missed appointment. It is not widely used as a status code. Additionally, it would be more commonplace to see a "CF" status or other reasoning for not meeting the service commitment to the customer. The fact that the order was a missed appointment is a given reality and not a true reason for the failure to meet the customer's date of expected service.

According to Kellermann, the use of a "CF" status helps no index as it can highlight a situation, wherein, Engineering has not recognized a service growth situation, aggravating the missed appointment scenario.

उस्ति १६ १५५५

The complainant was contacted on June 9, 1993, and on this date, and provided with the status of our efforts. The employee is still of the opinion that a "missed appointment" status should not be used in the service order process and that the true reason for the miss should be the status driver. She has had the proper procedures explained to her in detail.

Attached is the response as provided by Kellermann. No evidence of results manipulation by the group was developed as a result of this investigation.

Attachment

T. C. Keltermann, Jr.
Director - Administration
Network Operations/South

20th Floor - Southern Bell Tower 301 West Bay Street Jacksonville, Florida 32202 904 350-2021

PRIVATE & CONFIDENTIAL

June 25, 1993 File Code: 420.0800

Mr. James L. Preau General Security Manager 26JJ1 Southern Bell Tower 301 W. Bay Street Jacksonville, Fl 32202-4400

Dear Mr. Preau

SUBJECT: MISSED APPOINTMENT PROCEDURES - MISCELLANEOUS INVESTIGATION FILE FN13-05433

This is in response to your letter dated June 11, 1993 under captioned file.

After investigating this information, all service order coding and handling was found to be proper.

The order as stated by the complainant was placed by the subscriber on 5-11-93 with a due date of 5-24-93. The order was dispatched to employee 264 who was unable to complete the order due to a problem in the cable. The order was not completed on the due date and was properly shown to a missed appointment code CF. This does not help any index, to the contrary, a high CF rate can reflect a problem with engineering properly providing facilities in advance of anticipated customer service needs. The CF missed appointment code means that company facilities were not available to complete the service order.

The facilities to complete this service order were provided on 5-26-93 by repairing a wet splicing module in a buried cable. Both lines were installed this same day.

Missed appointment code information is available in Customer Service and Network offices in the CT/CF plan, SOCS operations manual and various other practices and procedures dealing with service order processing.

N. FLA. AREA SECURITY JACKSONVILLE HA.

JUN 29 1993

SOUTHERN BELLTEL & TEL CO.

The proper information substantiating this miss was also placed on the pending service order in the remarks section.

If you need additional information, please advise.

Ted Kellermann

Director - Administration Network Operations/South

sdc/wp51/palmcst

-3-

Area (Complainant -93-5-21 Security Case FN 13-05433 (CJP) closed, no disposition received from department. 4 Maintenance Center -: 93-5-24 Security Case FN 13-05434 (CJP) closed with correspondence to M. E. Cox, June 29, 1993. Referral has been investigated to the satisfaction of the employee reporting this matter. Contact was made with her this date and the new procedures explained in detail. 93-5-28 Ombudsman Complaint - Employee Parking (Memo 5-28 from Preau to Cox) 12 93-6-1 Central Office -Security Case FN 13-05438 (CWD), investigation pending. 14 93-6-7 Security Case FN 10-05077 (CWD), investigation pending. /6 93-6-9 Security Case FN 10-05078 (CWD), investigation pending. / ½ 93-6-10 Security Case FN 13-05440 (JLP), investigation pending. 20 93-6-12 Security Case FN 12-05074 (CJP), closed, no disposition received from department. 23 93-6-15 Security Case FN 10-05079 (CJP), closed, no disposition received from department. 25 93-6-17 Security Case FN 10-05082 (EWR) open, investigation pending.

	PAGE / OF 5
	EMPLOYEE REPORTING LINE INCIDENT REPORT
	STAFF OFFICE REFERENCE NUMBER 93-5-21
	DATE 5/25/93 TIME 3:30pm RECEIVED BY Darlene Vienes
5	FULL NAME OF PERSON MAKING REPORT:
	JOB TITLE:
7	DEPARTMENT:
8	LOCATION:
9 :	CONTACT NUMBER:
U	NATURE OF CALL: took customer call today
	checking when his service would be
	working. He placed order on 5-11 and
13	order was due on may 24. When
_	checked, it showed M.A. (missel appl.)
5	Customer said that wasn't true.
	SUBJECT INFORMATION:
7	FULL NAME(S):
	DEPARTMENT:
•	LOCATION:
	PHONE NUMBER:
	SUPERVISOR:
•	HOW DID COMPLAINANT ACQUIRE INFORMATION attaching a
	copy of service order
**	REFERRED TO: Preau AREA: FN
	DAME: 5/25/93 MIME: 41.40 DAM

EMPLOYEE REPORTING LINE INCIDENT REPORT

	NATURE OF CALL (CONTINUED):
	gut customer on hold + called 780-2935
	and was told to look in remarks.
	Remarks read CF for defective incapulation
7.	(when 2 lines arel going (in))
	said it shouldn't have been coded.
	MA. She thinks they are changing in
•	Dispatch ofc. and are doing it to helps
	meet their Index. The Employee in
	Dispatch said they have been doing
	it that way for 2-3 years. She
,	Called for updates +
5	talked with She teld him she
	thought this was an untegrity problem.
	He didn't think so.
8	could only tell customer
	we were working on it. She fayl
	a capy of service order (attached) and
	wants to know if this was correct
	procedure.
•	
	•

05-25-93 03:34 PM . In PAGE 3 of 5 Post-It" brand Fax Transmittal Memo 7672 No. of Pages Today's Data From Location Location Dept. Charge 321-6876 Risphone # Fax# Original Dostroy Roturn Call for pickup ia 007 TT5L79 001 904445 AO **34 445-7547 938** PLMC05-11-93 1216 05-11 (T517930 1FR CR4A74A Ø5-24-93 XCF \$.R.,904 436-1023,MRA,904476 DYK 23846 (DD 05-24-93) **Ø5-24-93** DYK03846 14 £5-19-93 IR ·LIST 17 18 19 20 21 22 TN; NEW INST -DIR)A 26 27 28 L BILL 1 31 2 32 33 34 35 36 37 R 600,708 266-46-3224 V Ø593 S&E BSXUP/PIN 5355 TS1C1 9LM 1 FR /NLC Y1/PIC 288

/PCA BO, 05-11-93

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) PAGE 4 of 5

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1A 007 TT5L79 002 904445 AO
                  - PLMCØ5-11-93 1216 Ø5-11
T5L793C 1FR CR4A74A Ø5-24-93 XCF
  LBN
  1FR
       /TN E/NLC Y1
  /PIC 200/PCA BO. 05-11-93
  TTR /TN SEQ1X/TN
  OCPA1/BI WIC/TN 3
  /OCP 718NY
  SLM /TN
  SEQ1X
RMKS
  NNA
  NEED OSPE TO PROVIDE SERVICE I
  N ENCAPSULATED PLANT
  ENG PF ANS 05-12 MHM
  DWG 2 STLPS 1,2,20
  LAC UPD REL RES NO DIAL TONE
  PENDING FRAME NEEDS DROP CBL
  5-17 1420
  RESEND DIS ISSUED ON 446-0492
   Ø5-18 Ø85Ø BFHFCBC
  ADD RO INFO 25-18 6924
   BFHFCBC
  05-24 CF W-CA REPR FOR DEF ENC
   PI COMP PER 264 8-11A JM CALL
   407-690-6052 FOR UPDATWS
\mathbf{R}
ASGM
                                     30
                                     31
  /CA PG502/PR 290/PGS DMS1U,
  1009/PGSC I/CUR F ES/DF F99-01
                                     34
  /PRQ Y/BP 1365/TEA F 209
                                      35
   PLCSFLU2624/RLA 71 WELLWATER
   DR/BCF BP 1365 TEA F 209
             DR/TPR 317654/RMTE
   XBOI STENCILD IN BCRWRDS IN
   COUNT STARTS AT BP1201
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XBOX STENCILD . ECKNRDS IN
COUNT STARTS AT B11201

2 /CA 209W/PR 651/ENC F 65 4

2 /CA 209W/PR 652/ENC F 65 6

TN
TN
TN
TN
C /CA 2/PR 704
C /CA 2/PR 706
OE 2000-7-08-17/EXK
/LFS/DF F99-01
/LPS/DF F99-01
/LPS/DF F99-01

-STAT
B F-264

C NRZ/DPN 1

TRANSMIT-SF2Z323N

NT 16.29.40 05/25/93* JN04F0E0 / MSG# 7509

9047699981

05-25-93 03:43PM P001 #17

PAGE 5 of 5

June 11, 1993

ERL # 93-5-21

Mr. C. J. Sanders
Vice-President-Network Operations
20th Floor
Southern Bell Tower
301 W. Bay Street
Jacksonville, Florida 32202

Dear Mr. Sanders:

1 j)

SUBJECT: MISSED APPOINTMENT PROCEDURES-

MISCELLANEOUS INVESTIGATION

FILE FN13-05433

The attached Employee Reporting Line complaint reflects confusion relative to the statusing of installation missed appointments. The reporting employee feels the status used on this particular order was possibly miscoded for indices purposes. General inquiries made by the reporting employee have met with unsatisfactory answers as to the proper coding of the order.

We are requesting that this matter be investigated by your staff and a written response provided to this office at your earliest convenience. Please provide the method of coding "missed appointments" and the logic used to "CF" similar types.

The reporting employee is not to be contacted under any circumstances.

We will respond through proper channels upon receipt of your findings, in order to bring this matter to an accurate conclusion.

RESTRICTED BELLSOUTH SECURITY INFORMATION

Any questions should be directed to me at 904-350-2883, in Jacksonville. Thank you for your prompt attention to this request.

Yours very truly,

General Security Manager North Florida Area

CJP:pw 2

Attachment

RESTRICTED BELLSOUTH SECURITY INFORMATION

D'/



James L. Presu
General Security Manager

26.U1 Southern Bell Tower 301 W. Bay Street Jacksonville, Fl 32202-4400 (904) 350-2823

Jii 0 2 5%

June 29, 1993

Mr. M. E. Cox Director-Security 20th Floor, 600 No. 19th St. Birmingham, Al 35203

Dear Mr. Cox:

SUBJECT:

13

COMPLAINANT

MISCELLANEOUS INVESTIGATION

FILE: FN 13-05434

ERL REFERENCE # 93-5-24

We have completed an investigation referencing the above Employee Reporting Line referral involving the statusing of out of service (OOS) customer trouble reports. The claimant indicated that Mechanized Loop Testing (MLT) Ver Code "0," "Test OK," was the driver as to whether or not individual reports were placed in an out of service status. If the "Test OK" Ver Code "0" resulted, the report was not statused in an out of service condition,

notwithstanding the complaint as reported by the customer.

This matter was referred to the office of Ted Kellerman, Jr., Director-Administration (Network Operations/South) on June 11, 1993, for procedural clarification. We have learned that a trial procedure, effective May 28, 1993, transfers the statusing of out of service reports to those assigned to the Centralized Repair Service Attendant Bureau (CRSAB). The attendant queries the customer as to the nature of the service condition through a series of questions. Each customer is asked whether or not they consider their telephone line out of service. This procedure statuses the report at the initial point of contact with the CRSAB and relieves the IMC from any responsibilities associated with the "OOS" categorization. Further, the MLT process is confined strictly to the testing of subscriber reports after receipt from the CRSAB.

In effect, the customer determines the status of the trouble; a departure from the applied mechanization associated with MLT.

The original referral has been investigated to the satisfaction of the employee reporting this matter. Contact was made with her this date and the new procedures explained in detail.

Attached is the response as gained from Mr. Kellerman. Any questions should be directed to my office at 904-350-2883 in Jacksonville.

Yours very truly,

General Security Manager North Florida Area

CJP:kw 7

Attachment

Thank you for your timely response in assisting us with this matter. Any questions should be directed to me at 904-350-2883 in Jacksonville.

Yours very truly,

General Security Manager North Florida Area

CJP:pw

Attachment

RESTRICTED CHITH SECURITY INFORMATION June 11, 1993

ERL # 93-5-24

Mr. C. J. Sanders
Vice-President-Network Operations
20th Floor
Southern Bell Tower
301 W. Bay Street
Jacksonville, Florida 32202

Dear Mr. Sanders:

10 SUBJECT:

\-COMPLAINANT MISCELLANEOUS INVESTIGATION FILE FN13-05434

We recently received the attached Employee Reporting Line complaint, which addresses the question of what constitutes an "out of service" report, as opposed to a customer report statused as "affecting service."

This particular report associated Maintenance Center MLT testing with the status process. If shown as a "test OK", and the customer is reporting a service problem, should the "test OK" reading prevail and the "out of service" status be discarded for record purposes?

Please provide this office with the proper guidelines which are being utilized at this time in Florida. The response should be in writing and this office will inform the originating employee of the proper procedures to be used.

No contact should be made with the complainant.

RESTRICTED BELLSOUTH SECURITY INFORMATION

Thank you for your timely response in assisting us with this matter. Any questions should be directed to me at 904-350-2883, in Jacksonville.

Yours very truly,

General Security Manager North Florida Area

CJP:pw

Attachment

RESIRCE OF LOURS SECURITY INCORMATION

- This matter was discussed with and he advised that inconsistencies occasionally may occur when administering these policies. That advised that the waiver policies have been re-covered with all employees as a result of this investigation. Further that he informed to do likewise.
- As explained by our policy is to accept the customer's word regarding the number of jacks at the original location to issue an order waiving the costs for jack installation at the new location.

It is probable that we can determine customers who received waivers; however, it is not clear if our records reflect the number of jacks at the original location.

If you believe that further investigation or an audit is appropriate, please call me. I will make any arrangements you deem appropriate.

Very truly yours,

General Security Manager

DHF:mrp

Attachments

a: Mr. M. E. Cox



Southern Bell

Mario C. Marilnez General Security Manager 668 N.W. 79th Avenue, Room 700 9 Miami, Florida 33126 305 222-0926

June 18, 1993

Dear Sir:

11

19

20

RE: EMPLOYEE REPORTING LINE INCIDENT REPORT 93-5-27

OFFICE

MISCELLANEOUS TRVESTIGATIONS FM 13-5134

On May 28, 1993, an anonymous referral was received on the "Employee Reporting Line" concerning inconsistencies with the procedures that permit the Company to waive certain charges (i.e. jacks) for victims of Hurricane Andrew.

An investigation was begun to identify procedures in place and to ascertain adherence to the procedures. Inasmuch as the referral specifically mentioned the . Office, was contacted and his assistance was requested.

The "Special Waiver Procedure for the March 12-14 Storms" was reviewed and a copy is attached. This procedure does allow certain charges to be waived.

The "A4 Tariff Interpretation, Fire, Wind, and Flood" was reviewed and a copy is attached. This interpretation was dated November 12, 1992 and was drafted in connection with Hurricane Andrew. The A4 tariff and its subsequent interpretation also waives certain charges.

In the allegation the caller stated that the procedure for waving certain charges pursuant to Hurricane Andrew were to be terminated on October 31, 1992, but they continued to the present. This information is incorrect. Customer services, pursuant to the tariff, may apply waivers where appropriate.

June 11, 1993

ERL # 93-5-24

Mr. C. J. Sanders
Vice-President-Network Operations
20th Floor
Southern Bell Tower
301 W. Bay Street
Jacksonville, Florida 32202

Dear Mr. Sanders:

IO SUBJECT:

MISCELLANEOUS INVESTIGATION

FILE FN13-05434

We recently received the attached Employee Reporting Line complaint, which addresses the question of what constitutes an "out of service" report, as opposed to a customer report statused as "affecting service."

This particular report associated Maintenance Center MLT testing with the status process. If shown as a "test OK", and the customer is reporting a service problem, should the "test OK" reading prevail and the "out of service" status be discarded for record purposes?

Please provide this office with the proper guidelines which are being utilized at this time in Florida. The response should be in writing and this office will inform the originating employee of the proper procedures to be used.

No contact should be made with the complainant.

RESTRICTED BELLSCUTH SECURITY INFORMATION

F03B36Z 0000297

EN 13-05434-2



T. C. Kellermann, Jr. Director – Administration Network Operations/South

June 22, 1993 File Code: 420.0800 20th Floor - Southern Belt Tower 301 West Bay Street Jacksonville, Florida 32202 904 350-2021

James L. Preau
General Security Manager
26JJ1 Southern Bell Tower
301 W. Bay Street
Jacksonville, Fl 32202-4400

Dear Jim,

/A SUBJECT:

**COMPLAINT
MISCELLANEOUS INVESTIGATION
FILE FN13-05434

This is in response to your letter dated June 11, 1993. Your file number FN13-05434.

Prior to May 28, 1993 the proper procedure for classifying an out of serviced customer report was predicated on the MLT Ver code at the time the report is auto or manually screened.

In the situation described in your correspondence; at the time the customer report was being screened by the Maintenance Administrator the report was test ok or Ver code 0. This report should not have been statused out of service. The rationale that the company used prior to May 28, 1993 was that MLT would be the factor that determined out of service not what the customer stated.

Since May 28, 1993, the company is trialing a procedure where the out of service classification is being placed on the customer report by the Repair Service Attendant at the time the report is taken in the CRSAB. This determination is currently being scored based on a question each customer is asked as to whether they consider their telephone line out of service. All out of service classification upfront is being done in the CRSAB instead of the IMC.

This is a major change and is being scruitinized carefully to insure accuracy of scoring. If this proves successful, it will eliminate employee misunderstandings such as presented in your letter

If you have questions, please advise.

Ted Kellermann

N. FLA. AREA SECURITY

JUN 28 1993

SOUTHERN BELL TEL. & TEL CO.

-3-

93-5-21 (Complainant -Security Case FN 13-05433 (CJP) closed, no disposition received from department. 19_ 93-5-24 Maintenance Center 2 Security Case FN 13-05434 /(CJP) closed with correspondence to M. R. Cox, June 29, 1993. Referral has been investigated to the satisfaction of the employee reporting this matter. Contact was made with her this date and the new procedures explained in detail. Ombudsman Complaint - Employee Parking 93~5~28 (Memo 5-28 from Preau to Cox) 12 93-6-1 Central Office -Security Case FN 13-05438 (CWD), investigation pending. /4 93-6-7 Security Case FN 10-05077 (CWD), investigation pending. (Dick Gennell) -16 93-6-9 Security Case FN 10-05078 (CWD), investigation pending. 93-6-10 Southern Bell Tower, Jacksonville, Fl -Security Case FN 13-05440 (JLP), investigation pending. 20 93-6-12 Security Case FN 12-05074 (CJP), closed, no disposition received from department. 23 93-6-15 Security Case FN 10-05079 (CJP), closed, no disposition received from department. 26 93-6-17 Security Case FN 10-05082 (EWR) open, investigation

pending.

	PAGE / OF 2
EMPLOYEE REP	ORTING LINE INCIDENT REPORT
STAFF OFFICE REFERE	nce number 93-5-24
DATE <u>5/26/93</u> TIME <u>2:3</u>	7pm. RECEIVED BY Darlene Unes
FULL NAME OF PERSON MAKIN	G REPORT:
JOB TITLE:	
DEPARTMENT:	
LOCATION:	
CONTACT NUMBER:	
	had a questian about
procedure in mai	had a question about interance Center. The way its not ethical.
she views it	ite not ethical.
said)	when a customer calls
sonois) and they	say they are out of service
- · //	es to Maintenance Center,
SUBJECT INFORMATION:	0
FULL NAME(S):_	Compliance Supernis
DEPARTMENT:	
LOCATION:	
	RE INFORMATION
REFERRED TO: Preau	AREA: FN
DATE: 5/24/93	TIME: 4:50 p. m.

EMPLOYEE REPORTING LINE INCIDENT REPORT STAFF OFFICE REFERENCE NUMBER 93-5-24

	NATURE OF CALL (CONTINUED):
	personnel in Maintenance will test the
	personnel in Maintenance will test the Customer's line. If it tests ok, then they are not supposed to status out of service.
	are not supposed to status out of service.
(2	
Ŏ	has questioned her supernisons
	about this, but they say it should not be
10	"out of SVC." if line tests ok.
	said they have complained but supernions is the way it should be. said maybe attorney General.
	say this is the way it should be.
13	said maybe Attorney General.
	wante it this way but I bwould
	like to know. Do me, it does not make
	plnse."
17	said she doesn't want to meet
	with anyone. She just wante an answer as to correct procedure.
19	as to correct procedure.
20	gane her a
	completion verser because she statused
•	"out of service".
	Completion evror because she statused: "out of service". This function going to Centralized Repair on 5/28/93.

2960

File Code: 860,2000

March 18, 1993

MEMORANDUM

To:

Operations Managers- Florida Customér Services

Managers- Florida Customer Services

From:

Lee Scrabis

much 13. ptom Subject: Special Waiver Procedures for the March 12-14 Storm

The following Southern Bell counties have been declared official disaster areas. We will apply special waiver procedures to customers residing in these areas.

Alachua Columbia Dade

Dixie Duval Hernando Martin Putnam Volusia

NEW_CONNECTS, T&F AND ADDITIONAL LINE ORDERS:

Customers relocating because of storm damage are eligible to receive a waiver of the non-recurring charges to re-establish service at a temporary location, as well as, the move back to the permanent address. Total charges waived are determined by the existence of a maintenance plan at the vacated address.

CUSTOMER HAS SEQ1X AT OLD LOCATION: Use FID IBIR HUR1 to waive appropriate charges. If customer wants more jacks at the new location than at the old, manually rate using INRM NRC XXXX.

CUSTOMER HAD NO SEQ1X AT THE OLD LOCATION: Use the FID IBIR HUR2 to waive the connection charges through the first jack. Additional jacks will be billed at the regular rate.

REPAIR/ REPLACEMENT OF EXISTING JACKS/ WIRING (no move): CUSTOMER HAS SEQIX: All jacks and wiring will be replaced at no charge, including prewire.

CUSTOMER DOES NOT HAVE SEQ1X: If the customer is completely out of service, we will provide one jack with wiring at either the temporary or permanent location at no charge. If the customer has service, there will be a charge for repairing any non-working

NOTE: Customers outside of these areas should be handled in accordance with the A4 tariff. A clarifying letter from Carol Gordon, dated November 12, 1992, is attached.

File Code: 860.2009

March 18, 1993

MEMORANDUM

To:

Operations Managers- Florida Customer Services

Managers- Florida Customer Services

From:

Lee Scrabis /

Subject: Waiver Procedures for the March 12-14 Storm

Should you receive any inquiries regarding the waiving of regulated charges due to storm damage, please use the tariff reference A4.2.1 which states:

H. Service Charges do not Apply to:

3. Service reestablished at a location which has been destroyed by or made untenable by fire, flood or other acts of God. If the subscriber desires service at a new location for a temporary period, all service charges, as appropriate, will apply for the establishment of service at the temporary location.

As far as <u>unregulated</u> charges (ie: jacks and wiring), customers with the maintenance plan will have all non-working jacks and wiring replaced at no charge.

Customers who do not subscribe to the maintenance plan and are completely without service, may have one jack installed at no charge by repair.

As further information, we, in Florida, may not use the tariff interpretation dated November 12 from Carol Gordon (file code 860.2009). That interpretation stated that the customer could choose whether to apply the regulated service order charge wavier when moving to temporary location or back to the permanent location. As you can see in the reference above, our tariff is very specific regarding this situation.

. Should you have any questions, please call me at (904) 350-5648.

Birmingham, Alabama November 12, 1992

To:

Tom Milstead, Staff Manager-Alabama Regulatory
George Frazee, Manager-Florida Regulatory
Bob Swett, Staff Manager-Georgia Regulatory
Beth Ice, Manager-Kentucky Regulatory
Bonnie Eades, Staff Manager-Louisiana Regulatory
Steve King, Staff Manager-Mississippi Regulatory
Beverly Pappy, Staff Manager-North Carolina Regulatory
Les Addis, Staff Manager-South Carolina Regulatory
Jim Gotto, Manager-Tennessee Regulatory

From:

Bonnie O'Bannon, Staff Manager-Pricing

Subject: A4 Tariff Interpretation: Fire, Wind, and Flood

The following is a Tariff Interpretation of the Service Charge (A4) waiver for Fire, Wind, and Flood:

Service Charges do not apply for either establishing at a new/temporary location or re-establishing at the original location, a customer's equivalent service after the premises is made untenantable by fire, wind, or flood.

This interpretation does not change the intent of the current tariff, which is to provide one waiver of service connection charges when a premises is destroyed or made uninhabitable. Currently the tariff provides that the waiver will be applied when the customer moves back into the repaired premises, and assumes that all customers eventually return. However, most rental customers never move back. This interpretation allows us the flexibility to apply the waiver as it was originally intended, while providing a better arrangement for our customer.

The waiver should be offered when the customer moves to a new/temporary location. This would appear to be the time when the customer needs his or her monetary resources for other basic needs. If the customer does not require service at a temporary location, the waiver should be applied when he returns to the original location.

This procedure will be filed in your Tariff with the restructure of Service Charges, but this interpretation is effective upon receipt. Methods are being sent to Customer Services contact personnel under separate cover. If you have further questions I can be reached at 205/977-0457.

sd: Bonnie O'Bannon

cc: Carol Gordon Ron Reardon Frank Norris

MIAMI, FLORIDA

2	93-3-26	• · · · · · · · · · · · · · · · · · · ·	13-5135	(DXC) (PENDING	INVESTIGATION CONTINUING
4	93-4-9		13~5128	(DXC) PENDING	INVESTIGATION CONTINUING
6	93-5-3		10-5064	(RLR) PENDING	IN TYPING
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19	93-6-25		03-5076	(DHF) PENDING	IN TYPING
18	93-6-29		13-5143	(DXC) PENDING	INVESTIGATION CONTINUING

	PAGEOF
EMPLOYEE REPORTING LINE INC	IDENT REPORT
staff office reference number 93-	-5-27
DATE 5/28/93 TIME 3:55 pm RECEIVED	BY Darlene. Times
FULL NAME OF PERSON MAKING REPORT:	mymous
JOB TITLE:	0
DEPARTMENT:	
LOCATION: + L.	
CONTACT NUMBER:	4 5
NATURE OF CALL: Caller said she)
Consistent in our policy of	morning Customers
service for free after the	vricase andrew.
Caller I statted after the	hurricane we told
customers rue would move	them their serve
out & back to their original	location for fu
SUBJECT INFORMATION:	
FULL NAME(S):	
DEPARTMENT:	
LOCATION: JL.	
PHONE NUMBER:	
SUPERVISOR:	
HOW DID COMPLAINANT ACQUIRE INFORMATION_	· · · · · · · · · · · · · · · · · · ·
<i>h</i> .	r- 11
REFERRED TO: Martinez	TIME: 4:30 p.m.
DATE: 5/28/93	MINE. 4:30 000

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EMPLOYEE REPORTING LINE INCIDENT REPORT

NATURE OF CALL (CONTINUED):
however, some customers are calling & were
morning them numerous times Cfor free.
and other customers are not fred. It
seems if the customer asks rue do. But
if the customer does not ask, we charge
Other. This was to be discontinued
after Oct 31, however, just yesterlay a
Customer had 10 jacks installed for
free and this was their 4. He move.
I Caller said this is not right. If
Miami Herald. Knew this, they would
have a field day. Caller said we
need to Other all customus the same.
Some customers have moved 5 or 6 times
· · · · · · · · · · · · · · · · · · ·
for free & other people. have not been moved for free at all.
•

BELLSOUTH TELECOMMUNICATIONS (2)

12:35 4

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June 14, 1993

HEHORANDUM TO:

The attached correspondence from Mario Martinez and reply are self explanatory. It will be appreciated if you could recover your Representatives regarding Hurricane Andrew order procedures.

Should you have any questions regarding the attached correspondence, please don't hesigate to call.

Operations Hanager

Attachment

SECURITY DETARTMENT
SOUTH FLORIDA

JUN 15 1993
SOUTHERN BELL TELS TIE CO.

F03B36Z 0000309

BELLSOUTH TELECOMMUNICATIONS @

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June 14, 1993

HEHORANDUH TO:

Hr. Hario C. Hartinez General Security Hanager Hiami, FL.

This is in response to your correspondence of June 4th concerning Employee Report FM 13-5134. On June 10th I discussed this issue with and reviewed our Company policy. Attached you will find special waiver procedures enacted as a result of Hurricane Andrew. These procedures have been covered with all Representatives and are very specific on the details of order handling. An exception could be where our records do not reflect the number of jacks at the original location. Our policy is to accept the customer's word and issue the order for the number of jacks the customer said was at the original location.

has agreed to recover all employees on this policy to insure that these guidelines are used when negotiating Hurricane Andrev related orders. By copy of this correspondence and attachments, notification will be given to the rest of the units in my district as well as in southeast.

Inconsistencies occasionally do occur in administering these policies and we will be happy to make corrections where these disparities are identified.

Opeyations Hanager
Attachment

30 cc:

F03B36Z 0000310

13-5134-5

ERI # 93-5-27

June 2, 1993

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Memo to: Mickey Cox

From: Cindy Roberts

L/ Subject: Ombudsman call from

called the Ombudsman office on May 26 at approximately expressed concern that there were a lot of unethical things happening in craft employee in the control center in ... His pager ? He said he worked outside as a number is in then was called to work inside in the ? He has witnessed several incidences in the control center involving his he should report. His put him in char that he felt put him in charge of the contract bid list when he went on vacation. The computer somehow became "locked-up" and he felt was responsible. He accused Ed of going into computer and taking out jobs on the he referred to as the , which he said was the main contractor in Florida. also referred to a and said jobs were being taken off of this particular list. He expressed that there was a lot of theft between the company and outside contractors.

I would appreciate your investigating these items listed above, and reporting your result to Mr. O'Neill.

Should you have any questions, please give me a call.

B.S.T. Security
Headquarters

JUN 0 4 1993

Elimingham, Ala.

F03B36Z 0000311

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1. J. J.

March 4, 1993

Mr. Stephen M. Klimacek Attorney 150 W. Flagler Street Suite 1910 Miami, Florida 33130

Dear Mr. Klimacek:

RE:

OMBUDSMAN COMPLAINT

-VICTIM

(-SUBJECT

REFERENCE #93-2-15

SOUTH FLORIDA FILE #4-5032

As you are aware, we jointly investigated the above captioned matter under the "Attorney Client Privilege". It is my understanding that the notes and reports prepared by you will be sufficient for your purposes.

Should you require additional assistance, please advise.

Sincerely you

Staff Manager-Security

DC:mrp

cc: M. E. Cox

B.S.T. Security Headquarters

MAR 0 8 1993

Birmingham, Ala.

Feb 24 09:26 1993 Cox_mec10's folder:newmail Page 1

DATE: Fri Feb 19 10:26 CST 1993 FROM: -jrg16 ?	93-2-15	Reference #
TO: Cox-mec10 CC:cr36,shk46, (SUBJECT: Ombudsman Complaint;	Oneill _G rwo16	

Mickey-

I got an anonymous complaint by telephone from a man who said he was an in South Dade.

He said that a friend of his.

found a note from his manager, Ttelling him that on his time report, was "using a code too much" /

The caller says that felt that the code was the appropriate one for the work he was doing and that he believes that the manager was asking him to falsify company records. The caller stated that in his opinion, this was the kind of activity that got us in trouble in Florida in the first place.

Please treat this as a complaint to the ombudsman and initiate the appropriate investigation.

Thanks,

John 🖔

1 4/20/93 Call fr

5BT Safety 529-2618

3 Worked *

Jask was looking @ safety of operations — Interviewed about 13-14 people/day during interviews he heard numerous complaints from Station Repair
(1) 5.0. being passed w/o service being turned up - begin bell imoxed.

when passed

(2) Several days later - Sto kep get repair order & find no deep ever installed, or no protector, or no IW - or all of these Indicates sero. never really turned up

Believe problem is Installation using lap top, going to cross box & making reg'd checks at cross box not @ oust. premise - Computer phases

circ ox so closes out automatically

got no indication from Station Repair people that Installation Repair mant is directing installation forces to do this Station Repair claim they have upt'd this to their might, but nothing is ever done.

These rets come from loaned Sta Rep. technician, but also from some locals who Day this has gone on for some time

20

had record of interviews, but they are in

21 22

This will give list of people Weir interviewed, but he did not note these who registered above complaint



Llocking & cafety in Fla ops to Sta Repair people - 18 days in Fla - S.O. passed w/o sew being furnel up -> Senday later, get repair order - no drop, no consictor, no IW Lap Top - Look on In - won't allow 50 /rep. to be.
closed also certain this - Doing e cross box
closes out automatic this Computer
No majorism of Nagnot Derective Consputer - Tost shows OK, but Kept run into repair perper who have to Drop Missing - Never placed Lapair: String Drop - Do IW also L-locals → continuing problem -Still 12helday 7day/wk Olso-Cablo Ep.) Expan people upt'd to bear night owner Aug

1 4/20/93 Call fr 1 SBT Safety Weir is safety inspector who fust returned for 18 days in I la on lande Free was looking @ safety of operations — Interviewed about 13-14 perfile /day during interviews he heard numerous complaints from Station Repair
(1) 5.0. being passed w/o service being turned up - begin bill immed. when passed (2) Several days later - Its Rep get repair order & find no dispisor installed, or no protector, or no IW - or all of Hese Indientes pert never really turned up helieus problem is Installation using lap tap, gring to cross box & making read checks at cross bur net @ ourt. premise - Computer phone: sere ox so closes out automatically got no indication from Station Repair people that Installation Refair mant is directing installation forces to do this. Station Repair claim they have upt'd this to their manner, but mothering is ever done. These rets some from loaned Sta Rep. technicians, but also from some locale who day this has gone on for some time had record of interviews, but they are in This will gove list of people who registered above complaint intersewed, but he did not note these

6 lock of a spity in Fla ops Leto Repair people - 18 days or Ala 7 - 50 paint up Lin berry Lo. 1 13 - Sendary later, get ripour order - ne drop, no consection, no IW Conjutes - Test shows OK, but closes cut without the Computer & closes box

No normal desput Durchio Kept new into who have to

SO al rady project - Drop. - Drop Missing - Neve: place - Espais: String Drop - Do IW also 1 Colocals - continuing problems -5411 1292/day 7day/wk Diso-Codstop. the cape yet o but rad once Aug

- 74 ° 40	
1 2-16-93 Time 9:25	문제가 그리고 그리던 사람들이 본래 시간을 다 것
1/4 02 0:85	
7-16-75 Time 7-25	
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EFFICIENCY 23-421-400 SETS CARBONLESS	

F03B36Z 0000323

14/16/93 Call fr. i

(fager 305-391-6510); | Muami . Ila

doaned E'es to Fla for N.C. New on 2d tour in Hurricanc ardrew rebuilding
Claims many loaned E'es are upoit & ready to leave

5 "Ecapo & has announced (4/15 or 4/16) that we are entiring back to 6 day, 8 h

per day wh week — New were on 13 on, 1 of whichelle w/considerable more

than 8 hrs/day back loaned E'es did not come to Fla, miles away for hor

to wh what is close to "regular hurs" ple want the 0/7

Pelicus Co is playing games — test ctr closing out cust spts when they

are not closed he claims Test close E'es are ardired to do so by

their suprino claims suprins have "don't care attitude"

12 believe Int levels in fear of their mont claims many traubles clieve

out at precisely the last time it can be done under tariff who penalty

Claims we will insurance money (\$74\$\vec{m}\$) to put up aerial cable &

new pulling down perfectly gd cable & putting it undergd "for next

hurricans"

17 Said he had ac of troll that which show closeout when whe not comple

I asked if others also had them to ke said "yis" so I asked if he

would plud me copies. He said he would called to send them to me

I told him to send them to me "Open by addressee Only"

2/16/93 200 call to Jerry Sanders re (1) Loaned E'ees unhappy w/reduction of wh g hrs Sanders said o/all assessment was we were mot getting froductivity fr 13 on /1 off exhibite, so decided to go to bon /1 off.

u/std 0/T JS laid they articipated unhappy is aming beared

="24 Lid not believe dept would change approach (2) re aerial cable being taken down & buried - JS said much cable was put up to get service restand, much was underwied & meeded to be replaced such replacement was planned from the beginning — Cable in this area will survive better being buried (3) JS was very concerned about fremature closeout of trouble that the wants to investigate ble agree of supr'rs are ordering or condoning it, some supr'rs must go! 324

AGE

* Uneth Condight] * Falsify Co nec.

-07: 10 10 5,=1/4 - 1/4: 100 . 6

Test Ctr Cose Out - Close Out Cust Rpts Parison Givings in it is the Lay for (Lax wit 7 days

Told from go on 6 day we wh

on boan. Talkers about leaving 450 min mod -Calfferice 10 min/rute

74M Coll But Up avail new

4 new Crice

Take down , put in gol - New buried cable

Fresh get with to get sent back in Derwice

Want ans, new - Pushing

154-12 (and state) - perd home

ULLI DOLLT CARE ATTITUDE

st Levels in feat

· Level Visites - Visit - planiet / Shiduled /

he out treb. - ordered to do

To Take Jan た こしょうちゅう 主した

5005069 0000395

Dien't come dans

days furk

Mr. Oncill To my serrow I henred yesterday that several people in the test center had been picked by the Florida PSC or some one to testify to them concerning what you and I had discussed Inst week My mind and my eye's see that this company is being distriged by its own managers who are covering up simple silly mess such as closing out daily _____trouble loads, when the simple Answer is and has been for the last thirty years fif the dam thing and don't worry about it for ten and many twenty years These people are costing this company ____ (That its employees use to be so sploud to be a part of) millions of excess dollars avery month that exist becouse in there minds they think that vice paper work & ___ clear books make this company work, Iwould say that it A NEW CARRIAN were to mucin on us foday and offer good service we would losse seventy percent of our constance base in Avery whert period of time Most of the const personal here have a total helpless feeling and are Just drying to make it to thirty years befor the system falls on its face, FO3B36Z 0000326-Help is stop the down Fall that is going on 326

. ---

Like I said people are scared to say paything. Is it possible for you to send Me A lot of signed letters stating that there will not be any retalation aganst anyone. It might bring out the good in some of the managers that act like Although slip we as a massive telecomnunication orginazation still have still a little time to get back into being the per Telephone company that exist. You know we were

Lupry & understand

15

faith in this outcome. Temp Alleur

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Wed 14 91

Here in just a few of my de Ticketo that I reconvered they went on so long and I am a little surely one they packe me thus out all the stuff in the ead. I will get and forward Tulet from grany other employees as soon as I ion get then to trust this was very of Therhung. They are saying that you take sill sun me off for salling you. Two second me a thanks up but are affirmed of the warme thing, last to show you the content of 15 only service look at the dollar on the one with the big circle on it. Now on the fact of the week we will be lock on things that have been out unless They have getter in to this. I gues nothing could be done about the cut back by the weekend. Xeveral groups signed up to lione. Masy they are right , its not possible To change things but some of is that beleave in this company till lope. Down kned with it of Thanks for Talking to me . How me a sail if you ment kelp.

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Mr. One:1/ Look Over Those And The others

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            icolors of pairs
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Acct Code YJM Hrs.
Acct Code Hrs.
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Transla

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ISVC CP'D 3-22 PER 1
 I $ $ SPEC CON
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RCC1 Code 7570 Hrs
Acc1 Code 24707 Hrs
RCC1 Code 9780 Hrs X
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Ma Loss Noise PI

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Product TW - CA
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(1	2/8	
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	7/8 United Sing 8668946	l Last trouble hist. automati obtained:	8/8 cally (
ITEST EQUIPMENT BUSYISIMULTANEOUS TEST I REQUEST MADE				
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	dispatch if1: 3 1/ ipr: 8143 bp: 8143 tcolors of pair:	facilities 6list terminal : 112005 SW 250 l	is: 2/6 TER	ļ
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:	CLOSE OUT EC# Time Clrd Dsptn Acct Code Acct Code Acct Code Travel Time SWO NFE	Comp Cause Hrs Hrs Noise	PI	
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The second of th

AYT. Given 1/Blerafti 116 Prior Troubles 13052585122 Tupe: AIRO-NOT di/std. telr: 14-17-93 tcat: cust. direc laddressi 2/8 IOOS: Y SUBS: 8
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IScreening info:

IScreening conts I/Blinitial tests 4/

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Info in creening conts I/Blinitial tests 4/

INOT IN CRE //T thossible ron

Info in creening info:

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NO ACC Fence Locked

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These must make things Look peter we were days Enly The A Look At Report & Comm on These And Note What we If re working the Monday After We are back on the New Due Stuff

F03B36Z 0000333

to te tell to te tell to the bounder

•:

3B36Z 0000334

OCB-P__OCB-B__DFH__PFRF.

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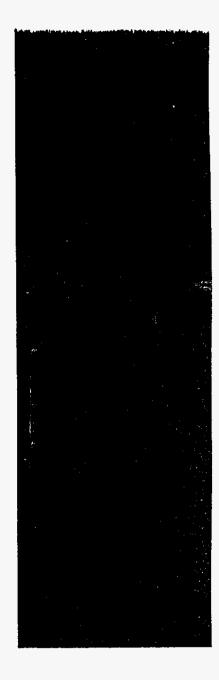
03B367 000033E

mero ... te

11513

COLUMN TO SERVICE STREET

These pre what were worked on during the foot weekend secked out dates and we were early on them Then back to the old quind of MAD Constraints on trenday



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Sect House

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This is from Tuesday on seedings

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                      last trouble hist
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 IRES
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(rec: 04-15-93 1838A: )
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 dispatch
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INOT A/P
                 1/8:
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                    |Screening info:
                    1005(OVR) VER 18
(Screening cont: 3/8(initial test: 4/8
                    IVER CODE NOT FOUND
IR-G OK
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18
                    icleared: 03-27-93
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due: 04-28-93 8688P )Yes
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l 8k 8v r-g	
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167.	
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H/1 / 13 /5/	

Do you see the difference In The Trouble dates As offosed To 4-19 4 417 last trouble hist last trouble hist Prior Tropble: 1/3|craft: 248 2/3 Itupe: Phys. Cond. iclr: 83-17-93 icat: cust. direct Subs: 1 |diso: 1218 loos: N INarr: : 24:C458 ispecial info: 3; (F/R . dispatch **CUSTOME** !address: 2/8 4/8 3/8!special info: 1FR IRES 6/8 5/8: 8/8 7/8:FI: IWP route: 4 rec: 84-18-93 838P:RESTRICTED SE grst ats :RV trouble nispatch 1/8: 2/8 INDT #ACCESS INEEDED#8SPEC !Screening info: !CONH** (OVR) DEFECTIVE 4/8 Screening cont: 3/8/initial test: IJACKS WAS NAS 84 ILINE IN USE :SUB(1) IAccess:A 8888A 5/8:last trouble icleared: 83-17-93 18 0500P : MSKENWORTHY 7/8:Last trouble 8/8 igttne thist. automatically Ptn: 0087887 lobtained: idue: 84-28-93 BS88P |Yes

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pr: 8466 bp: 8888	DILT PELBIUST	15: 6/6
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ICCt Code 474	1 Hrs	ブーーー
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THE WELL	Ch + C K	··~

13852554894 3/8/special info: IRES 1FR 6/8 7/81FI:CCS INP 6/8 cust at dispatch trouble NOT AIRO 2/8 **IScreening info:** 1#00S# VER 21 Screening cont: 3/8/initial test: -GROUND- AUTO SCR | GROUND |Access:A 5/8!last trouble Icleared: 05-20-91 7/8!Last trouble 8/8 lette thist. automatically 11<u>n: 8895429</u> lobtainedı Gres 84-17-93 8488P No diameter di establica IVERY HARD GROUND IEND OF SUNHARIES 1P-6 IVERY LIGHT GROUND 11-G 1 3500 k 1 517 k Bv t-g 3: icraft de: 5/8: 6/0 : 516k t-r! : 515k 1-9: 1 1k lv r-g! Icentral office: 7/81 8/8 diseate. incilities 1611 41 1/61ist terminal is:2/6 lprz 8430 bpz 8430 128881 SW 114 CT icolors of pairs 3/6:2nd terminal is:4/6 bps tors icolors of pairs ifz: 200015114C 5/61fz terminal is: 6/6 ipra 8839 bps 8814 IR 11438 SW 196 ST icolors of pairs cense our record EC#__ _ Dsp Time_ Time Clrd__ Comp Dsptn_ Acct Code Hard Hrs. Na___Loss__ Travel Time__ _Noise_ __REA___OCB-F SWO____NFE__ OCB-P_OCB-B_DPN_RAM

Over One Jack
Cut will
laddroser 2/8

JBI special info; 4/8

J/Bispecial infor Add Foo + 148. ino maint contract | . 554: VIST SAY 1 20 93 7/RIFT+CES Irouter-Irect 03-22-71 89380) |c05/ 01:2335191 1 dispatch NOT NOT A/P 1/81 DSY WHAT CLD, CUST ADV CABLE US CUT **IScreening infor** 1#005# VER 25 Screening cont: J/Blinitial test: 1-SC/GRO- AUTO SCR ISHORT AND GROUND |Access:A 5/8:last trouble 4/8 Icleared: 82-18-91 I SUB 7/Bilast trouble 8/8 icttns thist. automatically / tin: 8088495 Ho 3.5 0 14 due: 83-25-93 8688P

CLOSS OUT BLOOM

EC# (ST Dsp Time /J D

Time Cird' Comp JJ P

Dsptn Dill Cause J20

Acct Code Hrs

Acct Code Hrs

Ma Loss Noise PI

Travel Time //

SWO NFE REA OCB-F

OCB-P OCB-B DPN RAML

Trbl Lctn

220 Replet BSU-2 WHASUS fort Pot CA

Rmrks___

343

10 DOYS TOPA IU BAY JACK Ma U.'s 13052575165 laddress: 126615 SH 137TH AV. 1 2 C501 3/8:special info: 4/8 IRES 1FR * 5/8! 4/R Customer Irate 7/8/FII CCS 1WP 8/8 iroutes Irec: 64-11-93 87380110 \$ icust su dispatch THOT BEOT RHOS 1/81 IONCE NOTH DOS 18 IDYS (CL 84 DP iScreening infor T(DVR) OPH OUT DA 3/8/initial test: 4/8 WAS NAS B4 ICPE OR HIGH RESISTANCE OPEN ISUB(2) IAccess:A . S/8!last trouble 18 i Icleared: 81-81-78 HS:REERE'S 7/8:Last trouble 8/8 15. fz thist. automatically Ittn: 8143129 lobtaineds Idue: 84-14-93 8688P IND di 10 1 . 30 TOPEN OUT BALANCEN- TEND OF SUMMARIES ICAP BAL 99 % ! IDISTANCE FROM C.G. 1 9588 FT 11 ldc meass 1 3500 t-r 1 3500 Bv 1-o 31 3500 leraft des S/81ac: 1-r: 2008k 13588k t-q! 974k 13588k t-9 13586k Iv r-q! 851k Icentral office: 7/8: 8/B Icao 99 % lline ckt ak Ifrom co = 9500 ft Idial tone ok In it is an dienatch 1/611st terminal is:2/6 1f1: 6 lpr: 8818 bp: 8868 icolors of pairs 162: 3/612nd terminal is:4/6 Det bos icolors of pair: 13508H S/61fz terminal is: 6/6 lfz: tpr: 0784 bo: 0084 IR 26618 SW 136 AV icolors of pair: CLOSE UND DSP Time // Comp // Comp // Comp // Comp // Comp // Comp // Cause Acct Code // Hrs // Acct Code Hrs // Acct Code Hrs ÇL9⊊հ, 00% ___Noise_ Ma__Loss__Noise__PI_ Travel Time_V/ SWO__NFE__REA__OCB-F_ OCB-P__OCB-B__DPN__RAML_ Trb1 Lctn_____ Rmrks___ 210 CIT AND LOP IN TO F

ssed 5.0. on 413.95 -) No visit No FACT New Trailor ... Litethe Rest 13052451358 laddress: 110(41-1) 3/8/special info: 4/8 IRES 1FR **S/R**I 6/8 7/8:FI:UNP Froute: 385_257 25841 irec: 64-14-92 8309P1 |cust at: 8008000000 1 TON TONE 2/8 **IScreening infor** IVER41 OPN OUT Screening cont: 3/Blinitial test: 1100/11D0S## IAMALYSIS OF FULL PRESULTS NEEDED IACCess:A S/8!last trouble Icleared: 86-13-92 # 7/B:Last trouble 8/9 lettni thist. automatically Ittm: 8313443 lobtained: due: 84-19-93 8688P 1No direct h rest ITEST EQUIPMENT BUSYITINE OUT IN ACCESS IOFFICE OVERFLOW IEND OF SURMARIES 4/8 5/8: 8/8 Icentral office: 7/81 8/8 di spatch Osilities 1f1: PG39 1/6:1st terminal is:2/6 lpr: 157 bp: 187 icolors of pairs 1621 3/6:2nd terainal is:4/6 ipr: icolors of pairs lfz: 1330152885 5/61fz terminal is: 6/6 lpr: 725 bo: ENC colors of pairs FA! CT 955 QUT RECORD EC# 657 Dsp Time_ Time Clrd Time Clrd Deptn**028**(Cause /00 Acct Code 48M Hrs K Acc: Code____ Hrs__ Ma___Loss__N Travel Time_Jg Noise__ REA___OCB-F SWO____NFE OCB-P__OCB-B__DPN__RAML KOD_EMP_ PICT DOU BONT BXJ - X BOX + Res

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S. Routiddy MMAY
  S,0.<del>~</del>
 dispatch |
                                     2/8
                    l address:
                    ! HRISD
ILOT 208
                 3/8/special infor
IRES.
                  Z/BIFIICOS INF
Irec: #3-23-73 #19971 #25121CTS
INDT CRO
IPHNS
                    Screening info:
1400S# VER 41 -0/0
Screening cont: 3/8/initial tests
                                     4/8
 ICL BEF DISP-AUTO
                    TOPEN OUT: BALANCED
 !SCR
                  5/8!last trouble
                                      6/8
 :Access:A
                     Icleared: 18-26-88
 18
 INRS
                  7/8:Last trouble 8/8
 ict to:
                     thist. automatically
 11tn: $217669
                     lobtained:
 idue: 93-26-93 8688P !No
                      director test
 TOPEN OUT BALANCED- TEND OF SURMARIES
 :CAP BAL 188 X
 IDISTANCE FROM C.O.
        4808 FT
                                      4/8
                     dc meas:
                     : 3500
                                      t-r
                     : 3580
                    3: 3500
                  5/81 ac:
 teraft des
                  1-r! 2000k
                                       t-r
 :3586k
                 1-91 472k
  :3SABk
                                       1-0
 13500k
              6v r-g! 479k
  Icentral office: 7/8!
                     Icap 188 %
  :line ckt ok
                      ifrom co = 6888 ft
  idial tone of
                       . . iliti.
  dispotch
        25
                   1/611kt terminal is:2/6
  ifl:
  ipr: 8198 bp: 6198
                  3/612nd terminal is:4/6
  icolors of pairs
  | 1621 | 1000EHOURT S/61/2 terminal is: 6/6
  ipr: 6895 bp: 6812 IR icolors of pair: 116y 200
CLOSE OUT RECORD

EC# 15 Dsp Time 21

Time Cird 1/7 Comp 33
  Depin 0/9/
Acct Code
  HCCt Code 151A Hrs
Rcct Code 151A Hrs
                            Hrs_
   Acct Code_
                       Noise
           Loss
   Travel Time__
                       REA
   SWO____NFE_
                               OCB-F
: 0CB-P___0CB-B___DPH__
Trb1 Lctn_____
   Rerks_
     500-00-
        130-240 Meeting
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auf As
                 special info: 4/8
      1FR
!PFS
Irec: 04-06-73 09300110 #
loust at12541119 = 1 , 5 10.
THOT NOT NU
ISVC3-38 NOS NEW
ILNE PER BOACE.
                  IScreening infor
INFT438P
                  1#005# VER 41 -0/0
IScreening cont: 3/8/initial test: 4/8
ICL BEF DISP-AUTO 10PEN OUT: BALANCED
ISCR
IAccess:A 8200P 5/8:last trouble
18 8688P p
                  Icleared: 01-01-78
INR
                7/8:Last trouble 8/8
CLINE
                  thist. automatically
 111n# 8858896
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Idue: 84-89-93 8688P !No
 Tipotch.
                   والمرجودية
 TOPEN OUT BALANCED- LEND OF SUMMARIES
 1CAP BAL 186 %
 IDISTANCE FROM C.O.
     22500 FT
                   1 3510
                                  t-r
                   1 3596
                 31 3580
 :craft dc:
                S/B! ac:
                1-r: 348k
                                  t-r
             Dv 1-g: 287k
                               --. 1-9
            Ev r-gl 297k
                                  r-q
 Icentral office: 7/8:
 lline ckt ok
                   1cap 188 %
                   Ifrom co = 22580 ft
 idial tone ok
                1/611st terminal is:2/6
 :f1:
 ipr: 1252 bp: 8152 IF 19828 SN 119 AV
 icolors of pairs
                3/612nd terminal is:4/6
          bp:
 ipr:
 colors of pairs
 ifz: 198285119A 5/6;fz terminal is: 6/6
 (pr: 8492 bp: 8881 - IR 11961 SW 198 ST
  icolors of pairs
 CLOSE QUE PECON
              __ Dsp Time_
 EC#
 Time Clrd
                      Comp
 Ospin @Vd) Cause /00
Acct Code Hrs
 Acct Code_
                        Hrs
 Acct Code
                        Hrs
                    Noise__
        _Loss___
  Travel Time 4
 SWO___NFE___REA___OCB-F
  OCB-P
            _OCB-B___DPN_
  Trbl Lctn_
     100 Emp Rad PICO AXIT
    Proch affied in IU_
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A: Iled & Paid For! Three months - Not even Hooked was At perident Sent out to Add New Jack laddress: This company Iserial: QXX5906 llocations 3/8/special info: 4/8 I due: 84-86-93 8588P With The York lappt. code: W 10 ASC 5/8laccess remarks: 6/8 lcust ats 1-ody Assed |route: · As wirked iaccess con'ts 7/8|service code: 8/8 HIFR irelated order? N 15.0, nors IN JANUARY 17 serv order dispatch serv order info lbillings 1/61 iserialk 0XX5986 Ittm: 0392679 lest. tine: 1030 SEE 3/6154Ea 4/6 1/11 VCA/11 IRJIIC/II ESX/II 1 Org odr 161SEES NEVEN serv order diseatch (toilities lf1: 16 1/7:1st terminal is:2/7 lpr: 0163 bp: 0163 IR 11870 SW 181 ST colors of pairs inarrative: 3/7inarrative: IOE AAB4-1-02-28 | Inarrative: 5/7/narrative: Customer Comment She Thought She had introllyth PANING so they would en they got ground To it. CLOSE GUT RECORD
ECH S6 DSP, Time
Time Cird Comp Dsptn. Cause Acct Code 9 AT Hrs 7 Kg Acct Code____ Ma____Loss_ Noise_ Travel Time K SWO____NFE_ _REA___OCB-F OCB-P_OCB-B_DPN_RAML Rmrks 500 ch pica ID- Bite-BXJ REXX HVO CAM. H KO R-11830 183



Form 3181-8

D

Employee's Nam-		Title Maintenance Administrator
Department	Network	Location 3100 Emerson St., Rm. 121

Emp's. Initials Heid By Content Of Interview BN Warned concerning her unsatisfactory attendance. Advised her that she must improve to a satisfactory level or further disciplinary action could be taken, up to and including dismissal. F03B36Z 0000911 -



Employee's		Title Maintenance Administrator	
Dapartment	N	letwork Location 3100 Emerson St., Rm. 121	_
Date	Held By	Content Of Interview	Emp's Initials
9-20-91	BM.	Warned concerning her unsatisfactory attendance.	
	•	Advised her that she must improve to a satisfactory level or	
		further disciplinary action could be taken, up to and	
	_	including dismissal.	
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FORM 3181-8 JAN. 1976

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PERSONNEL RECORD **CURRENT ENTRY SHEET**

DEPARTMENT Attucks DATE HELD BY * CONTENT OF INTERVIEW 10/1/90 SN. Counciled with Consuming two Location 3100 Emiko occ Lo	
DATE HELD BY * CONTENT OF INTERVIEW 10/1/90 &M. Counciled with Concuming here Limporting actions afternoonal w/1,	<u> </u>
10/1/90 BM. Counciled with Concitaing Live Limporting attendance: "/",	
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SECEIVED-	
MI 0 1 90	
OPERATIONS MANAGER	
NETWORK SOUTH JAX	
,	B36Z 00009



Form 3181-B (10-8-4)

Employee's Name Department		i Maintenance Administrator	Maintenance Administrator		
Debarrmen	NN	letwork St.			
Date	Held By	Content Of Interview	Emo's Initial		
6-2-88	DDB	Counselled on her unsatisfactory			
		attendance. 6/2/88			
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Form 3161-B (10-84)

3

	Name	* Title Maintenance Administrator	
Department	Net	Location Rm. 114A, 3100 Emerson St.	
Date	Held By	Content Of Interview	Emp' Initia
3-14-51		Suspended for 5 hours on Sunday, 02/28/88, for	
		her unauthorized absence on 02/27/88. Advised	
		future incidences of a similar nature will result in more	
		severe disciplinary action, up to and including termination.	
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Form 3181-B (9-80)

Personnel Record Current Entry Sheet

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epartment		Distribution Location 115 Alhambra Circle., Rm.	321
Date	Held By	Content Of Interview	
06/01/84	RJK	Counselled employee on overall attendance.	
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Form 3181-B (9-80)

Personnel Record Current Entry Sheet

Employee's	Name	THIS MAINTAINENCE ADMINISTRATOR
Department	D1511	LOCATION 214 ALMANDA COR BAS. 50
Date	Held By	Content Of Interview
//-22.83	Ism	REVIEWED SUSPENSION OF 4-25-83 FOR LESS THAN SATISFACTORY PUNCTUALITY. ADVISED MS. KING THAT THE SUSPENSION WAS STILL IN EFFECT AND THAT IMMEDIATE AND SUSTAINED IMPROVEMENT MUST BE MADE AND MANDAMED OR MORE SEVERE DISCIPLINA ACTION MAY BE TAKEN.
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FORM 3181-8 JAN. 1976

PERSONNEL RECORD **CURRENT ENTRY SHEET**

	EMPLOYEE	I'S NAME.		TITLE M.A.
	DEPARTME	мт	15	RIBUTION LOCATION CORAL GABLES
	DATE	HELD BY	*	CONTENT OF INTERVIEW
4	4-25-83	BNH		Suspended, Low one day (4-26-83) for less
			<u> </u>	then satisfactory princtiglity admised for
				that immediate and sustained improvement
				must be made and maintained or more
7			<u> </u>	severe disciplinary action may be taken
1				4)25/83
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Form 3181-8 (9-80)

Personnel Record Current Entry Sheet

	Employee's	Name	Title Maintenance Administrator
	Department	Distr	ibution Location 214 Alhambra Circle, Room 504
	Date	Held By	Content Of Interview
4	2/24/83	B.W.H.	Reviewed the warning of July 23, 1982 and warned that
			improvement in Punctuality must be made and maintained or more
7			severe disciplinary action may be taken.
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epartment _		ibution Location 214 Alhambra Circle, Room 504
· · · · · · · · · · · · · · · · · · ·		Content Of Interview
	Held By	
/24/83	B_W_H	Reviewed the warning of February 8, 1982 and warned hat improvement in attendance must be made and maintained or more
		severe disciplinary action may be taken.
		2/24/83
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Form 3181-8 (9-80)

Personnel Record Current Entry Sheet

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Employee's Name		Title DISPARA CLEAK
)eparitment	DISTR	IBUTION Location 214 ALHAMBRA Con Rosso
Date	Held By	Content Of Interview
7-26-82	JSM	REVIEWED THE WARNING OF 12-1-81 AND WARNED
		THAT IMPROVEMENT IN PUNCTUALITY MUST
		BE MADE AND MAINTAINED ON MORE SEVENE
		DISCIPLINARY ACTION MAY BE TAKEN.
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Form \$181-13 (9-80)

Personnel Record Current Entry Sheet

Employee's Name _		Title Dispatch Clerk		
Department	Distr	ibution Location 214 Alham. Circ., Rm.504		
Date	Held By	Content Of Interview Warned bout her unsatisfactory attendance, advised her that		
2/8/82	J <u>SM</u>			
	<u>.</u>	improvement must be made and maintained or more severe discipling	iar	
		action may be taken. 2/8/82		
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Form 3181-8 (9-80)

Personnel Record Current Entry Sheet

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Employee's	Name	Title Dispatch Clerk
Department	Distri	bution Location 214 Alhambra Circle, Rm.504
Date	Held By	Content Of Interview
1/5/82	JSM	Counselled with concerning her unsatisfactory
		Attendance performance. 4x 5,1982
 		
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Southern Bell

Personnel Record Current Entry Sheet

Department .	Distr	ibution Location 214 Alhambra Circle,	-Rm -504			
Date	Held By	Content Of Interview				
12/1/81	JSM	Warned about her unsatisfactory punctuality.				
<u> </u>		Advised her that improvement must be made and maintained				
		or more severe disciplinary action may be taken.	14			
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FORM 3181-8 JAN. 1976

PERSONNEL RECORD CURRENT ENTRY SHEET

	EMPLOYEE	S NAME_		TITLE Dispatch Clerk		
	DEPARTME	NT Dis	trib	Dution LOCATION 214 Alhambra Circle, I		
		DATE HELD BY *		CONTENT OF INTERVIEW		
45	9-10-81	J. M.		Counseled with concerning her unsatisfactory Punctuality performance.		
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<u> </u>				F	03B36Z 00009	