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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

DOCKET NUMBER 920260-TL

DIRECT TESTIMONY OF

DONALD B. MCDONALD

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FPSC-RECORDS/REPORTING

1 Q. Please state your name and business address.
2 A. Donald B. McDonald, 101 East Gaines Street, Tallahassee, Florida
3 32399-0866.
4 Q. Where are you employed and in what capacity?
5 A. I am employed by the Florida Public Service Commission in the Division
6 of Communications as Engineer-Supervisor in the Bureau of Service
7 Evaluation.
8 Q. Please describe your communications and regulatory experience.
9 A. I joined the Commission staff in 1991, after thirty-one years of
10 telecommunications experience with GTE Florida and GTE Data Services.
11 My jobs with GTE were as a Traffic Engineer, Supervising Engineer,
12 Traffic Manager, Data Processing Manager and Customer Services Director.
13 My duties as Traffic Engineer and Supervising Engineer included
14 conducting traffic studies to determine the level of service being
15 provided and for preparing specifications for adding central office
16 switching equipment and trunking.
17 Q. What is your educational background?
18 A. I have a degree in Industrial Engineering from the University of
19 Florida.
20 Q. What are your responsibilities in your current position?
21 A. Since joining the Public Service Commission, I have been supervising the
22 Engineers who perform service evaluations. These evaluations include
23 initiating test calls, analyzing data, making inspections and reporting
24 the results of the tests and inspections.
25

1 Q. Have you previously testified before the Commission?

2 A. Yes, I filed testimony in the recent cases involving United Telephone
3 Company (Docket No. 910980-TL), St. Joseph Telephone Company (Docket No.
4 910927-TL), and Alltel Florida (Docket No. 920193-TL).

5 Q. What is the purpose of your testimony?

6 A. The purpose of my testimony is to address Issue 39 and provide an
7 independent analysis of the quality of service provided by Southern Bell
8 and Issue 403 as to whether there should be a penalty imposed upon
9 Southern Bell for poor quality of service. My testimony also addresses
10 Issue 39a as to Southern Bell's compliance with Rules 25-4.070 and 25-
11 4.110 which require a company to give a customer a rebate for an out of
12 service condition when the company fails to notify, within 24 hours of
13 the report, that the trouble is located in the customer's premise
14 equipment.

15 Q. With respect to Issue 39 and whether the quality of service is adequate,
16 how did Staff conduct its service evaluation of the company?

17 A. Staff's service evaluation methodology normally includes an analysis of
18 the company's periodic service reports of monthly exchange performance
19 in fourteen (14) categories, and field tests and inspections in seventy-
20 one (71) categories to measure the level of compliance with the
21 commission's service standards and generally accepted industry
22 performance levels. Staff initiated over 380,000 test calls in the
23 company's service area performing evaluations in 1992 and 1993 using
24 automated telephone test equipment. In addition, staff reviewed the
25 level of complaints filed with the Division of Consumer Affairs against

1 | the company and made suggestions, where appropriate, as to the
2 | corrective action the company should take.

3 | Q. What does your analysis of the company's 1991 and 1992 periodic reports
4 | show?

5 | A. In the 1991 periodic reports, SBT reported that they missed the
6 | objective of repairing out of service trouble within 24 hours from a
7 | range of 6 to 39 centers per month out of a total of 102 centers (see
8 | Exhibit DBM-1, page 1). During the first seven months of 1992, they
9 | reported missing the objective from a low of 9 to a high of 36 centers.
10 | I didn't consider the months of August through December, 1992 due to
11 | Hurricane Andrew. The largest number of misses (36) occurred in July
12 | and was down from the high in 1991 of 39 centers that missed the
13 | objective.

14 | On the rule where service orders must be completed within three days,
15 | during 1991 the number of centers that missed this rule ranged from 0
16 | to 6 (out of 102). During 1992 the range was 2 to 19 with the 19
17 | occurring in July. This data is reflected in Exhibit DBM-1, pages 1 and
18 | 2.

19 | Q. Have you reviewed the periodic reports for 1993?

20 | A. Yes. I reviewed the periodic reports covering the period from January
21 | through September 1993. The report shows that failures to meet the out
22 | of service over 24 hours increased dramatically in 1993 over both 1992
23 | and 1991. The third quarter report shows that every repair center in
24 | the state missed the objective for the months of July, August, and
25 | September. In addition, for the entire year an average of 77.8% of the

1 repair centers have not made the objective. The data is reflected in
2 Exhibit DBM-1, page 3.

3 Q. What does the report show concerning service orders?

4 A. Through September 1993, an average of 21.6% of the service centers have
5 failed to meet the rule on installing new service within three days.
6 This is a large increase in the failure to meet the rule over both 1992
7 and 1991.

8 Q. What conclusion would you draw from these reports on trouble and on
9 service orders?

10 A. There is a very disturbing trend that indicates an increase in the
11 centers that failed to meet the service order completion within three
12 days (delayed connects) and in repairing trouble within 24 hours.
13 Delayed connects increased from 2.5% of the centers missing the
14 objective in 1991 to 8.5% of the centers missing it in 1992 to the 21.6%
15 in 1993. In repairing trouble within 24 hours, 18.1% of the repair
16 centers missed it in 1991 whereas in 1992 the average was 21.1% and in
17 1993, 77.8% missed the objective.

18 Q. Are there any other results in the periodic reports which are of concern
19 to you?

20 A. Yes. The 1993 reports bear out a concern we have for the answer time
21 in the business office and in repair under the new answer time rules.

22 Q. What changes were made to the answer time rules?

23 A. In Docket 910506-TL there was an amendment to Rule 25-4.073, F.A.C.
24 Answering Time that went into effect November 24, 1992. This rule was
25 modified to take into account the menu systems that the companies are

1 using to direct calls principally to repair and the business office.
2 It also changes the method that staff uses to evaluate answer time in
3 that timing begins from the last digit dialed rather than from the first
4 ring back tone.

5 Q. What results did you see using the new answer time rules?

6 A. The business office answering time objectives, as measured under the new
7 answer time rule, have been met only 30.1% of the time during 1993.
8 This was an improvement over both 1991 and 1992.

9 Q. What was the answer time for repair?

10 A. The answer time objective for repair was met once this year (September).
11 However, since the company is now providing "live" answer instead of a
12 menu system, the answer time has improved. Prior to removing the menu
13 system for repair in June, the company missed the objective 67% of the
14 time versus 25% since removing it, and met the objective in September.

15 Q. Have you reviewed the customer complaints for Southern Bell?

16 A. Yes. I have reviewed the level of complaints for both 1991 and for 1992
17 through July in order to discount the effect of Hurricane Andrew. I
18 have also reviewed the complaints for 1993. In 1991 the level of
19 complaints against SBT was .492 per 1000 customers versus the state
20 average of .416 per 1000 customers. In 1992 it has dropped for both SBT
21 and the state as a whole. Through July, It was .203 per 1000 customers
22 for Southern Bell and the state average was .186 per 1000. The results
23 through September, 1993 show Southern Bell was .274 and the state was
24 .243 per 1000. Exhibit DBM-2, pages 1, 2 and 12 reflect these figures.

25 Q. What have been the majority of the complaints?

1 | A. In 1991 the majority of complaints were delayed connects for new
2 | service. As outlined in Exhibit DBM-2, pages 3 and 4, staff wrote SBT
3 | a letter dated 9-12-91 outlining that from January 1990 through August
4 | 1991, SBT had 731 delayed connects out of a total of 808 for the entire
5 | state. Staff requested that SBT indicate what action they would take
6 | to address this continuing problem.

7 | Q. Did staff receive a response from SBT?

8 | A. Yes. SBT responded on October 31, 1991 (Exhibit DBM-2, pages 5 and 6)
9 | with its plans for reducing the number of delayed connects. The company
10 | also responded to another staff inquiry (Exhibit DBM-2, page 7) as to
11 | when plans would be put into place and stated that the implementation
12 | date was November 12, 1991 with improved results expected immediately
13 | (Exhibit DBM-2, pages 8, 9, 10, and 11).

14 | Q. Was the company's corrective action effective?

15 | A. Partially. Through July, 1992, the PSC received 120 delayed connect
16 | complaints as compared to 251 for the same period of 1991. This
17 | reflects a reduction in delayed connect complaints of 52% which would
18 | indicate that SBT's plan for reducing delayed connects has succeeded in
19 | reducing complaints. However, this reduction in delayed connect
20 | complaints is not reflected in the periodic reports, which as I
21 | previously testified, reflects an increase in the number of centers
22 | missing the service connect objective in 1992 as compared to 1991.

23 | Q. What did the 1993 complaints show?

24 | A. The majority of complaints for 1993 have been service outages. We are
25 | in the process of requesting that Southern Bell provide to staff what

1 | actions they will take to resolve this problem.

2 | Q. What has been the result of staff's 1992 service evaluation?

3 | A. Exhibit DBM-4 is a copy of staff's service evaluation report for the
4 | period of May 11 through July 17, 1992, involving the Gainesville and
5 | Orlando LATA areas. The Executive Summary shown on pages 1 through 8
6 | of Exhibit DBM-4 describes each LEC and IXC category evaluated, the
7 | Commission rule requirement or accepted industry standard, the company's
8 | performance and whether the rule or standard was met. Of the seventy-
9 | one (71) LEC standards measured, Southern Bell failed to meet fourteen
10 | (14). Eight (8) of the failures related to the company's pay telephone
11 | operations. All eight (8) of these were rule violations. The major
12 | violations were handicapped access, no address on the payphones, no
13 | current directory, serviceability and automatic coin returns. The three
14 | other payphone rule violations were less than 1% below the objective and
15 | included inadequate lighting, no telephone number listed, and no dial
16 | instructions. The six (6) other violations included three rule
17 | violations and three missed standards. The three rule violations
18 | included repair and business office answer times and customer rebates.
19 | The business office answer time of 1.1% versus the rule of 80% was very
20 | poor. Repair answer time was 45.1% versus the 90% requirement. Both
21 | of these results were lower than in the previous evaluation and continue
22 | to be a problem.

23 | Q. Was this new answer time rule used during this evaluation?

24 | A. Since this rule went into effect on November 12, 1992 which was after
25 | our evaluation, this rule was not used in our 1992 evaluation. However,

1 we made tests calls in the Gainesville and Pensacola areas in December,
2 1992 to determine if SBT was meeting the new rule in the business office
3 and in repair. The first part of the rule requires that 95% of all
4 calls made to either repair or the business office be answered by a menu
5 driven automatic answering system within 15 seconds. Our study showed
6 SBT answered 100% in both repair and the business office under this
7 criteria. Another part of the rule is that subscribers, electing the
8 option of transferring to a live operator, be answered 95% of the time
9 within 55 seconds after the last digit of the telephone number listed
10 in the directory for the company's service was dialed, except for the
11 business office which is 85%. SBT answered 93.9% versus the required
12 95% for repair and 82.9% versus 85% for the business office. In
13 addition, the new rule requires that at any time during the call the
14 customer shall be transferred to a live attendant if the customer fails
15 to interact with the system for a time period of ten (10) seconds
16 following any prompt. For repair, the transfer time in this scenario
17 exceeded ten seconds on all calls and for the business office, the ten
18 second requirement was met only 52.4% of the time. This is outlined in
19 Exhibit DBM-3.

20 Q. Did SBT meet the new answer time rule?

21 A. No, based on the 1992 evaluation, SBT did not meet all the criteria of
22 the new rule. Using a composite of the three factors mentioned
23 previously in the new answer time rules, repair was answered 67.4% and
24 the business office 71.4%. Both missed their objective. While they
25 were closer than under the previous rule, SBT still needs to make

1 | improvements, particularly in the area of promptly transferring a
2 | customer to a live operator following any prompt to which the customer
3 | does not respond.

4 | Q. Did the company agree to take corrective action to address the
5 | deficiencies identified in staff's evaluation?

6 | A. Yes. Southern Bell advised us of the action they would take and have
7 | taken to resolve most deficiencies. See Exhibit DBM-9, Pages 1-7.
8 | However, they stated that they would not rebate for out of service
9 | trouble caused by customer premise equipment (CPE) (see Exhibit DBM-9,
10 | pages 4 & 5). For staff's comments to Southern Bell's response see
11 | Exhibit DBM-9 pages 6 & 7.

12 | Q. What are the results of staff's 1993 service evaluation?

13 | A. Exhibit DBM-5 is a copy of staff's service evaluation report for the
14 | period of July 12 through September 2, 1993, involving the Jacksonville,
15 | Pensacola, and Panama City LATA areas. The Executive Summary shown on
16 | pages S.1 through S.5 and pages E.1 through E.3 of this exhibit
17 | describes the company's performance and whether the standard was met.
18 | Southern Bell failed to meet fourteen (14) of the seventy-one (71)
19 | standards. Eight of the standards missed involved paystations.
20 | Although this was the same as the 1992 evaluation, there was improvement
21 | as the misses were closer to the standards. Two standards, Directory
22 | Assistance Billing and Availability of Service were very close to the
23 | standard. The answer time for both repair and the business office were
24 | much improved and exceeded the standard.

25 | Q. What are the major concerns reflected in the 1993 service evaluation?

1 | A. The major concerns remain repairing out of service trouble and in
2 | providing rebates. Out of service restoral was 85.2% versus the
3 | standard of 95% and same day restoral was 62.0% versus 80%. Rebates
4 | were provided 83% versus 100%.

5 | Q. How are violations handled that are found during service evaluations?

6 | A. The company is asked to respond to our service Evaluation Report and to
7 | specify the corrective action that has been or will be taken. In some
8 | cases corrective action is taken by the company during the evaluation.
9 | However, since our evaluation report was only recently completed, the
10 | company's initial response to the evaluation was not available when this
11 | testimony was filed.

12 | Q. Has the company satisfactorily addressed the service evaluation
13 | violations?

14 | A. Since they are still reviewing the evaluation, not all items have been
15 | addressed as yet. Many of the items were mentioned during the
16 | evaluation and Southern Bell has already taken steps to address most of
17 | the deficiencies mentioned. Staff will be working with the company to
18 | resolve all the remaining deficiencies found during the evaluation.
19 | With respect to issue 39a, the company has stated that it does not
20 | intend to rebate out-of-service trouble reports that go over 24 hours
21 | and are customer premise equipment (CPE) problems. The majority of
22 | reports that went over 24 hours and were not rebated were in this area.

23 | Q. In your opinion, is this a violation of the rules?

24 | A. Yes. Rule 25-4.070 reads in part "Also, if the company finds that it
25 | is the customer's responsibility to correct the trouble, it must notify

1 or attempt to notify the customer within 24 hours after the trouble was
2 reported." Therefore, I believe that when the company fails to notify
3 a customer within 24 hours that the trouble is not the company's
4 responsibility, the company is required to make an adjustment under this
5 rule. In addition, Rule 25-4.110 reads in part "Each company shall make
6 appropriate adjustments or refunds where the subscriber's service is
7 interrupted by other than the subscriber's negligent or willful act, and
8 remains out of order in excess of twenty-four hours after the customer
9 notifies the company of the interruption." Thus, no matter who is
10 responsible for correcting the problem, if the company does not notify
11 the customer otherwise, and the trouble is not due to the customer's
12 willful act or negligence, then the company is required to make the
13 rebate.

14 Q. Should the Commission consider any other factors relating to the quality
15 of service provided by Southern Bell?

16 A. Yes. The Weighting System Rule that was adopted on June 2, 1993 is a
17 useful tool to measure the company's overall performance, rather than
18 simply considering the company's pass/fail service evaluation
19 performance on each of the standards. The Weighting System is a formula
20 that allows a telephone company's performance on each of the standards
21 to be weighted into a single number on a scale between zero to one
22 hundred (100). Using this formula, a company exactly meeting the
23 Commission's minimum standards on all criteria would receive an overall
24 rating of 75. Staff has computed Southern Bell's service evaluation
25 performance using the weights and rule standards which were adopted.

1 Q. What was the weighted index for the 1992 evaluation?

2 A. Using the composite answer time that is shown in Exhibit DBM-3 the
3 weighted index was 68.4 (see Exhibit DBM-6, pages 1-4).

4 Q. Did the 1993 service evaluation show any improvement in the weighted
5 index?

6 A. Yes, the weighted index for the 1993 evaluation was 75.0 which meets the
7 minimum standard of 75 points if all standards are exactly met (see
8 Exhibit DBM-5 pages W.1 through W.4). However, the company failed to
9 meet several standards. Nevertheless, this is an improvement over the
10 1992 evaluation of 68.4 points.

11 Q. In your opinion, is the quality of service provided by Southern Bell
12 satisfactory?

13 A. No. Although the latest evaluation shows that Southern Bell has
14 improved over the 1992 evaluation and is just meeting the minimum index
15 of 75 points by exceeding some standards to compensate for those that
16 were missed, I cannot easily dismiss the fact that according to their
17 own periodic reports, not one repair center is meeting the standard for
18 repairing out of service trouble within 24 hours. We are in the process
19 of requesting that Southern Bell provide us with what action they intend
20 to take in order to meet this standard. In addition, improvement is
21 still needed on their business office answer times. Although the latest
22 evaluation showed that they met the standards, the periodic reports show
23 that they are still missing the standards 30.1% of the time. The
24 company should also reduce the number of delayed connects. In addition,
25 the company should be required to rebate customers for any out-of-

1 service condition that occurs when the company fails to notify the
2 customer within 24 hours that the trouble is located on the customer's
3 side of the demarcation point.

4 Q. Since Southern Bell's incentive regulation plan was first approved, has
5 the staff notified the Commission concerning Southern Bell's failure to
6 meet Commission rule standards?

7 A. Yes, four dockets are involved. In Docket No. 910505 Staff recommended
8 initiation of show cause proceedings against Southern Bell for failure
9 to meet Commission Rules 25-4.110(2), involving refunds and Rule 25-
10 4.073(1)(b) which is about answering time. In Docket No. 910506 Southern
11 Bell petitioned to amend Rule 25-4.073, regarding answer time. In Docket
12 No. 910622 the commission accepted Southern Bell's settlement offer of
13 \$40,000 to resolve allegations that the company failed to meet the
14 answer time Rule 25-4.073 (Exhibit DBM-7). Docket No. 910505 was closed
15 as a result of the settlement; however, staff was directed to further
16 investigate Southern Bell's compliance with Rule 25-4.110, on rebates.
17 This investigation is ongoing in Docket No. 910727. Southern Bell's
18 petition to amend the answer time rule was approved and the rule has now
19 been amended as discussed earlier in my testimony.

20 Q. Has the staff used the Weighting System to compare Southern Bell's
21 performance over time?

22 A. Yes. It must be recognized, however, that our service evaluations are
23 not companywide at any one time because of the size of Southern Bell.
24 Year to year evaluations are also conducted at different locations
25 within Southern Bell. However, staff has applied the current weighting

1 factors to Southern Bell's historical service evaluation performance.
2 Exhibit DBM-8 shows what the weighted index was on each of the last six
3 evaluations. In the review that was done in 1987 prior to approval of
4 the company's rate stabilization plan, the index was 79.3 points which
5 was above the standard of 75 points. In the third quarter 1988
6 evaluation it rose to 86.1 points. However in the next three
7 evaluations it fell to 84.2 in 1989, 71.9 in 1991, 68.4 in 1992 and
8 currently is at 75.0 points.

9 Q. With respect to issue 403, do you believe a penalty should be imposed
10 upon Southern Bell for poor quality of service?

11 A. Yes, based on the current trend (Third Quarter, 1993 Periodic Report,
12 see Exhibit DBM-1, page 3) that shows that the company is not currently
13 repairing out of service trouble within 24 hours in any of its service
14 centers and for its failure to satisfactorily meet the repair standards
15 in our 1993 evaluation, I feel that a penalty of one tenth on one
16 percent (.10%) of return on equity should be levied against the company.
17 Southern Bell should also be ordered to provide rebates on all CPE
18 caused out of service troubles when the company fails to notify the
19 customer (or attempts to notify) within twenty four hours of the
20 original report.

21 Q. Does this complete your testimony?

22 A. Yes.

23

24

25

SBT PERIODIC REPORT 1991

MONTH	OOS-24HRS			SO w/in 3 DAYS		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	6	102	5.9	2	102	2.0
FEB	7	102	6.9	2	102	2.0
MAR	7	102	6.9	0	102	0.0
APR	8	102	7.8	2	102	2.0
MAY	11	102	10.8	1	102	1.0
JUN	24	102	23.5	4	102	3.9
JUL	39	102	38.2	6	102	5.9
AUG	31	102	30.4	4	102	3.9
SEP	23	102	22.5	2	102	2.0
OCT	30	102	29.4	3	102	2.9
NOV	14	102	13.7	3	102	2.9
DEC	21	102	20.6	1	102	1.0

1991 AVG 18.1 2.5

MONTH	ANS-TIME Operator			ANS-TIME Dir. Assistant		
	FAILED	TOTAL	%PASS	FAILED	TOTAL	%PASS
JAN	0	1	100.0	0	4	100.0
FEB	0	1	100.0	0	4	100.0
MAR	0	1	100.0	0	4	100.0
APR	0	1	100.0	0	4	100.0
MAY	0	1	100.0	0	4	100.0
JUN	0	1	100.0	0	4	100.0
JUL	0	1	100.0	0	4	100.0
AUG	0	1	100.0	0	4	100.0
SEP	0	1	100.0	0	4	100.0
OCT	0	1	100.0	0	3	100.0
NOV	0	1	100.0	0	3	100.0
DEC	0	1	100.0	0	3	100.0

1991 AVG 100.0 100.0

MONTH	ANS-TIME Repair			ANS-TIME Bus. Office		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	2	3	66.7	1	4	25.0
FEB	1	3	33.3	1	4	25.0
MAR	0	3	0.0	2	4	50.0
APR	1	3	33.3	4	4	100.0
MAY	1	3	33.3	4	4	100.0
JUN	3	3	100.0	4	4	100.0
JUL	2	3	66.7	4	4	100.0
AUG	2	3	66.7	3	4	75.0
SEP	2	3	66.7	2	4	50.0
OCT				1	4	25.0
NOV	MISSING DATA			1	4	25.0
DEC				0	4	0.0

1991 AVG 38.9 56.3

SBT PERIODIC REPORT 1992

MONTH	OOS-24HRS			SO win 3 DAYS		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	16	102	15.7	5	101	5.0
FEB	24	102	23.5	5	99	5.1
MAR	22	102	21.6	4	101	4.0
APR	21	102	20.6	2	101	2.0
MAY	9	102	8.8	2	101	2.0
JUN	23	102	22.5	16	101	15.8
JUL	36	102	35.3	19	100	19.0
AUG	53	102	52.0	6	101	5.9
SEP	35	102	34.3	18	100	18.0
1992 AVG			26.0			8.5

MONTH	ANS-TIME Operator			ANS-TIME Dir. Assistant		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	0	1	0.0	0	3	0.0
FEB	0	1	0.0	0	3	0.0
MAR	0	1	0.0	0	3	0.0
APR	0	1	0.0	0	2	0.0
MAY	0	1	0.0	0	3	0.0
JUN	0	1	0.0	0	3	0.0
JUL	0	1	0.0	0	3	0.0
AUG	1	1	100.0	2	3	66.7
SEP	1	1	100.0	1	3	33.3
1992 AVG			22.2			11.1

MONTH	ANS-TIME Repair			ANS-TIME Bus. Office		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	0	2	0.0	2	3	66.7
FEB	0	1	0.0	1	3	33.3
MAR	0	1	0.0	2	3	66.7
APR	0	1	0.0	2	3	66.7
MAY	0	1	0.0	0	3	0.0
JUN	1	1	100.0	2	3	66.7
JUL	1	1	100.0	3	3	100.0
AUG	1	1	100.0	3	3	100.0
SEP	1	1	100.0	3	3	100.0
1992 AVG			44.4			66.7

SBT PERIODIC REPORT 1993

MONTH	OOS-24HRS			SO w/in 3 DAYS		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	66	102	64.7	26	102	25.5
FEB	46	102	45.1	21	102	20.6
MAR	71	102	69.6	7	102	6.9
APR	59	102	57.8	11	102	10.8
MAY	68	102	66.7	20	102	19.6
JUN	98	102	96.1	20	102	19.6
JUL	102	102	100.0	19	102	18.6
AUG	102	102	100.0	41	102	40.2
SEP	102	102	100.0	33	102	32.4
1993 AVE			77.8%			21.6%

MONTH	ANS-TIME Repair			ANS-TIME Bus. Office		
	FAILED	TOTAL	%FAILED	FAILED	TOTAL	%FAILED
JAN	Missing Data			10	12	83.3
FEB	2	2	100.0	2	16	12.5
MAR	2	2	100.0	7	21	33.3
APR	3	4	75.0	7	21	33.3
MAY	1	4	25.0	5	18	27.8
JUN	2	3	66.7	3	20	15.0
JUL	1	3	33.3	7	20	35.0
AUG	1	3	33.3	8	20	40.0
SEP	0	2	0.0	8	20	40.0
1993 AVE			52.2%			30.1%

TELEPHONE INDUSTRY

YEAR-TO-DATE

	1991 Total Received	Percent Change From '90	Complaints Per 1000 Customers	Justified Per 1000 Customers
ALLTEL	63	43%	1.196	0.607
CENTEL	129	3%	0.472	0.212
FLORALA	2	0%	1.169	1.169
GTE	511	41%	0.304	0.120
GULF	1		0.131	0.000
INDIANTOWN	5	400%	2.048	0.410
LONG DISTANCE	979	14%	---	---
NE FLORIDA	4	-20%	0.713	0.000
PAY TELEPHONE	249	46%	---	---
QUINCY	4	-33%	0.439	0.110
ST. JOSEPH	8	-47%	0.364	0.228
SOUTHERN BELL	2160	13%	0.492	0.210
SOUTHLAND	1	-75%	0.326	0.000
UNITED	246	8%	0.230	0.067
VISTA-UNITED	2		0.292	0.146
INDUSTRY TOTAL	4364	17%	0.415	0.172

TELEPHONE INDUSTRY

YEAR-TO-DATE

	1992 Total Received	Percent Change From '91	Complaints Per 1000 Customers	Justified Per 1000 Customers
ALLTEL	34	-3%	0.622	0.330
CENTEL	61	-24%	0.213	0.049
FLORALA	0	-100%	0.000	0.000
GTE	275	-9%	0.159	0.078
GULF	2		0.260	0.000
INDIANTOWN	0	-100%	0.000	0.000
LONG DISTANCE	474	-25%	---	---
NE FLORIDA	1	-67%	0.172	0.000
PAY TELEPHONE	133	-8%	---	---
QUINCY	6	200%	0.621	0.414
ST. JOSEPH	1	-80%	0.044	0.000
SOUTHERN BELL	925	-28%	0.203	0.077
SOUTHLAND	1		0.319	0.319
UNITED	145	-7%	0.131	0.029
VISTA-UNITED	2	100%	0.312	0.156
INDUSTRY TOTAL	2060	-22%	0.186	0.071

COMMISSIONERS:
THOMAS M. BEARD, CHAIRMAN
MICHAEL WILSON
BETTY FASLEY
J. TERRY DEASON
SUSAN F. CLARK



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER,
DIRECTOR
(904) 488-1280

Public Service Commission

September 12, 1991

Mr. Marshall Criser, III
Operations Manager, Regulatory Affairs
Southern Bell Telephone Company
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Dear Mr. Criser:

The attached analysis of LEC complaint activity handled by the Division of Consumer Affairs points out that Southern Bell has a disproportionate share of the complaints (90%) for the past twenty months relating to delayed connection of service. Furthermore, this category of complaint appears to account for approximately 22% of the total complaints received against Southern Bell.

Under the circumstances, please respond by October 15, 1991, and indicate what action Southern Bell is taking to address this continuing problem area. Feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Alan Taylor".

J. Alan Taylor, Chief
Bureau of Service Evaluation

Attachment

c: T. Booker

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: September 12, 1991
 TO: ALAN TAYLOR, CHIEF OF SERVICE EVALUATION, DIVISION OF COMMUNICATIONS
 FROM: TERRILL BOOKER, ENGINEER III, DIVISION OF COMMUNICATIONS *TB*
 RE: CONSUMER COMPLAINT ANALYSIS

The data from the complaint activity reports are listed as follows:

		<u>SBT Delayed Connect</u>	<u>LEC's Delayed Connect</u>	<u>Total Number of SBT Complaints</u>	<u>Total Number of LEC Complaints</u>
August	1991	39	44	167	336
July	1991	40	41	211	374
June	1991	41	45	186	359
May	1991	37	40	190	399
April	1991	35	36	192	388
March	1991	40	45	194	408
February	1991	26	30	152	351
January	1991	32 <u>290</u>	35 <u>316</u>	167 <u>1459</u>	379 <u>2994</u>
December	1990 ***	441 <u>731</u>	492 <u>808</u>	1912 <u>3371</u>	3732 <u>6726</u>

*** Note(!) December 1990 is the total year end summary for 1990. The monthly data for 1990 is not available.



Exhibit DBM-2

Southern Bell

Marshall Criser, III
Operations Manager
Regulatory Relations

Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(904) 222-1201

October 31, 1991

Mr. Alan Taylor, Chief
Bureau of Service Evaluation
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Dear Mr. Taylor:

Attached is the response to your request for information in your letter dated September 12, 1991. We appreciate your extending us an additional two weeks to review our records.

Should you have any questions concerning the response, please contact Wayne Tubaugh at (904) 222-1201.

Yours Truly,


Operations Manager
Regulatory Relations

Attachment

cc: J. Sanders
T. Lombardo
H. Anthony
T. Kellerman
J. Moore
W. Tubaugh

001 3 10



Southern Bell

T. C. Taylor
Operations Manager-IMC

Room 14JJ1 Southern Bell Tower
301 W. Bay Street
Jacksonville, Florida 32202
(904) 350-3586

October 31, 1991

Mr. Marshall Criser, III
Operations Manager, Regulatory Affairs
Southern Bell Telephone Company
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Dear Mr. Criser:

Investigation into the cause of Southern Bell customers contacting the PSC regarding delayed requests for new service has revealed the majority of these complaints were generated from the Miami, Ft. Lauderdale and West Palm Beach exchanges.

Our plans for improvement is as follows:

1. Increase construction activity in these areas where facilities might be limited;
2. Re-evaluate the prioritization given to service provisioning on primary service requests.
3. Place additional emphasis on customer notification when service will not be provided within the time promised and provide the customer with intermediate status reports when necessary.

Yours truly,

Commissioners:
THOMAS M. BEARD, CHAIRMAN
MICHAEL WILSON
BETTY EASLEY
J. TERRY DEASON
SUSAN F. CLARK



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER,
DIRECTOR
(904) 488-1280

Public Service Commission

November 12, 1991

Mr. Marshall Criser, III
Operations Manager
Regulatory Relations
Southern Bell
150 South Monroe St.
Tallahassee, FL 32301

Dear Mr. Criser:

Pursuant to your company's approach to solving the new service delay complaint problems listed in your October 31, 1991 letter, what is the company's estimated time frame for your corrective actions to produce noticeable improvement in the number of complaints regarding delayed installation of new service?

Please respond by December 2, 1991. If you have any questions, you may contact me at 904/488-1280.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Alan Taylor".

J. Alan Taylor, Chief
Bureau of Service Evaluation

cc: Terrill Booker
FN: a:\mem.wp



Southern Bell

Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(904) 222-1201

file
13,2,1
SBT-Anna

Marshall Criser, III
Operations Manager
Regulatory Relations

December 3, 1991

Mr. Alan Taylor, Chief
Bureau of Service Evaluations
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Dear Mr. Taylor:

This is in response to your letter dated November 12, 1991 concerning the implementation of my company's plans to improve the problems identified with request for new service. Attached is our response and as you will note the implementation date was November 12, 1991 with improved results expected immediately.

Should you have any additional questions concerning this matter, please contact Wayne Tubaugh at (904) 222-1201.

Yours truly,

for i.w. Zulf
Attachment

- cc: J. Lacher
- J. Sanders
- T. Lombardo
- H. Anthony
- T. Kellermann
- T. C. Taylor
- J. Moore

RECEIVED

DEC 4 1991

DIVISION OF COMMUNICATIONS



Southern Bell

Room 14JJ1 Southern Bell Tower
301 W. Bay Street
Jacksonville, Florida 32202
(904) 350-3586

T. C. Taylor
Operations Manager -- CSCC

November 26, 1991

RECEIVED
DEC 2 1991

Mr. Marshall Criser, III
Operations Manager, Regulatory Affairs
Southern Bell Telephone Company Manager SEA
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301


U.S. MAIL & REG. RELATIONS
TALLAHASSEE, FL

Dear Mr. Criser:

In reference to Mr. Taylor's letter of November 12, 1991 please be advised that our plans went into effect October 16, 1991.

If additional information is desired please let me know.

Yours truly,


T. C. Taylor - Operations Manager
I&M/IMC Support Staff

cc: W. A. Tubaugh
K. M. Szymczak
R. Suarez

October 16, 1991

Memorandum

To: Operations Managers - Florida and Alabama

From: General Managers Florida and Alabama
Vice President South Operations

Subject: Delays in providing new service to customers

This letter is being issued to establish a consistent policy through out the South Operations regarding the prompt provisioning of service.

It is the goal of our corporation to have facilities available to meet the request of our customers for new service within the normal service order intervals within each state. Based on the volume of Public Service Commission appeals in Florida regarding delays in providing customers request for new service, we are falling dangerously short of this goal. It is imperative that each of you reevaluate your performance in this area.

The Southern Bell CT/CF Plan in Florida and South Central Bell practices in Alabama covering Service Provisioning detail responsibilities for the timely issuance and completion of service orders. When evaluating your performance in this area you are encouraged to reference these documents.

Specifically we must make every effort to provide service on or before the initial due date provided the customer by the business office. In many cases this will require a change in some operations procedures. When spare facilities are not available engineering must make decisions on what is required to release the order to meet the initial due date. In Florida this may involve breaking an under age CT.

If the proper decision to meet a new service order due date is to break a CT, it must be followed up with the correct documentation and initiation for restoral. The main emphasis must be on providing service to our customers as we initially agreed. If the decision is to clear defective pairs, repair personnel must devote the same priority to this effort as they do toward clearing an out of service customer report.

We must be more responsive to potential service connection delays and respond with the same intensity as we devote to restoring a customer service outage. This part of our business needs your personal involvement in order to continue our improvement.

concurred *Paul A. Kinley*, Gen. Manager-Network/SEFla

Concurred *W. L. ...*, Gen. Manager-Network/NFla

Concurred *[Signature]*, Gen. Manager-Network/SFla

Concurred *[Signature]*, Gen. Manager-Network/Ala

Approved *C. J. ...*, Vice President South Operation

TELEPHONE INDUSTRY

YEAR-TO-DATE

	1993 Total Received	Percent Change From '92	Complaints Per 1000 Customers	Justified Per 1000 Customers	Y-T-D Complaint Index*	September Complaint Index*
ALLTEL	13	-73%	0.224	0.086	0.52	0.80
CENTEL	75	-15%	0.248	0.083	0.57	0.77
FLORALA	2		1.073	0.000	2.47	0.00
GTE	409	11%	0.229	0.097	0.53	0.58
GULF	2	0%	0.253	0.000	0.58	0.00
INDIANTOWN	3		1.086	0.000	2.50	0.00
LONG DISTANCE	1371	134%	---	---	---	---
NE FLORIDA	1	-67%	0.160	0.160	0.37	0.00
PAY TELEPHONE	169	3%	---	---	---	---
QUINCY	2	-78%	0.196	0.000	0.45	0.00
ST. JOSEPH	11	1000%	0.464	0.169	1.07	0.00
SOUTHERN BELL	1277	8%	0.274	0.121	0.63	0.65
SOUTHLAND	0	-100%	0.000	0.000	0.00	0.00
UNITED	152	-18%	0.131	0.034	0.30	0.42
VISTA-UNITED	1	-50%	0.151	0.000	0.35	0.00
INDUSTRY TOTAL	3488	32%	0.243	0.101		

*Percentage of complaints divided by percentage of customers

ANSWER TIME STUDY-SOUTHERN BELL
 DECEMBER 4 & 7,1992 GAINESVILLE & PENSACOLA
 USING AMENDMENT OF RULE 25-4.073, F.A.C., ANSWERING TIME
 DOCKET NO. 910506-TL

	ANSWERED BY MENU WITHIN 15 SEC.	NON-INTERACTIVE WITHIN 55 SEC	INTERACTIVE WANTS OPERATOR 10 SECONDS
REPAIR			
CALLS	46	33	13
ANSWERED	46	31	0
% ANSWERED	100.0	93.9	0.0
MET RULE	YES	NO	NO
BUSINESS OFFICE			
CALLS	56	35	21
ANSWERED	56	29	11
% ANSWERED	100.0	82.9	52.4
MET RULE	YES	NO	NO

COMPOSITE

REPAIR	
CALLS	46
ANSWERED	31
% ANSWERED	67.4
RULE	95%
MET RULE	NO
BUSINESS OFFICE	
CALLS	56
ANSWERED	40
% ANSWERED	71.4
RULE	85%
MET RULE	NO

State of Florida

Exhibit DBM-4

Commissioners:
THOMAS M. BEARD, CHAIRMAN
BETTY EASLEY
J. TERRY DEASON
SUSAN F. CLARK
LUIS J. LAUREDO



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 488-1280

Public Service Commission

October 30, 1992

Southern Bell Telephone Company
ATTN: Mr. Marshall Criser, III
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

Dear Mr. Criser:

We performed a service evaluation of your company's operations in the Gainesville and Orlando LATA area during the period of May 11 thru July 17, 1992. The results of the evaluation are reflected in the attachments. Details are contained in the referenced exhibits. Additional observations, suggestions, and comments are contained in Appendix B.

No response is required for categories meeting the rules or where a rating of "Satisfactory" is shown. Where rules are not being satisfied or the results were unsatisfactory, we request you respond within thirty days from the date of this letter, outlining the corrective actions taken. If you have any questions, please contact Frank Williamson or Elton Howell at (904) 488-1280.

Sincerely,


Walter D'Haeseleer
Director

WDH/CF/emd
Attachments

cc: William Talbott
Richard Tudor
Alan Taylor
Frank Williamson
Elton Howell
Don McDonald
Public Counsel

Evaluation Summary

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
A. Dial Tone Delay					
Dial Tone Delay	95	99.9	X		1
B. Call Completions					
(1) Intra-Office	95	99.9	X		2A
(2) Inter-Office	95	99.2	X		
(3) EAS	95	99.7	X		
(4) Intra-Lata	95	98.2	X		
(5) Inter-LATA	90				2B
AT&T		99.0	X		
Allnet Comm.		97.6	X		
Biz Tel		97.9	X		
Cable/Wireless		98.3	X		
Delta Comm.		98.4	X		
MCI		98.7	X		
Metromedia		98.0	X		
Phone One		99.4	X		
National Telcom		99.1	X		
South Net		98.3	X		
South Tel/ATC		98.1	X		
Sunshine		94.3	X		
TeleFibernet		97.3	X		
Telenational		99.2	X		
Touch One		97.2	X		
U.S. Sprint		99.2	X		
C. Answer Time					
(1) Operator Answer Time	90	92.8	X		3A
(2) Directory Assistance	90	98.3	X		3B
(3) Repair Service	90	45.1		X	3C
(4) Business Office	80	1.1		X	3D

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
 May 11 thru July 17, 1992

Evaluation Summary

Continued

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
D. Adequacy of Directory Services					
(1) Directory Service	100	100.0	X		4A
(2) New Numbers	100	100.0	X		4B
(3) Numbers from Directory	NP/ 99	100.0	Satisfactory		4B
E. Adequacy of Intercept Services					
(1) Changed Numbers	90	100.0	X		
(2) Disconnected Service	80	100.0	X		
(3) Vacation Disconnects	80	***			
(4) Vacant Numbers	80	90.0	X		
(5) Disconnects Non-Pay	100	100.0	X		

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
May 11 thru July 17, 1992

Evaluation Summary

Continued

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
F. Public Telephone Service					

Each Exchange,					
1 or more Pay Station	100	100.0	X		
(1) Serviceability	100	98.4		X	
(2) W'chair/Hearing imp.	100	78.4		X	
(3) Glass	NP/ 95	100.0	Satisfactory		
(4) Door	NP/ 95	***			
(5) Level	NP/ 95	100.0	Satisfactory		
(6) Wiring	NP/ 95	99.0	Satisfactory		
(7) Cleanliness	95	99.7	X		
(8) Lights	100	99.7		X	
(9) Telephone Number	100	99.7		X	
(10) Name or Logo	100	100.0	X		
(11) Enclosure	NP/ 95	100.0	Satisfactory		
(12) Dial Instructions	100	99.7		X	
(13) Transmission	NP/ 95	99.7	Satisfactory		
(14) Dialing	NP/ 95	100.0	Satisfactory		
(15) Coin Return (Auto)	100	97.3		X	
(16) Coin Return (Opr.)	NP/ 95	96.6	Satisfactory		
(17) Opr. I.D. Coins	NP/ 95	99.0	Satisfactory		
(18) IXC Access	100	100.0	X		
(19) Ring-back (Opr.)	NP/ 95	95.6	Satisfactory		
(20) Coin-free (Operator)	100	100.0	X		
(21) Coin-free/rtn (D.A.)	100	100.0	X		
(22) Coin-free (911)	100	100.0	X		
(23) Coin-free/rtn (Repair)	100	100.0	X		
(24) Coin-free/rtn (Bus.Off)	100	100.0	X		
(25) Directories	100	98.3		X	
(26) Directory Security	NP/ 95	97.7	Satisfactory		
(27) Address/Location	100	97.0		X	

6

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
May 11 thru July 17, 1992

Evaluation Summary

Continued

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
G. Toll Timing and Billing Accuracy					
(1) Intra-LATA	97	100.0	X		7A
(2) Directory Assistance	97	98.0	X		7B
(3) Credit Card...ATT	97	100.0	X		7A
(4) Inter LATA	NP/ 97				7C
AT&T		0.0			Unsatisfactory
Allnet Comm.		0.0			Unsatisfactory
Biz Tel		0.0			Unsatisfactory
Cable/Wireless		0.0			Unsatisfactory
Delta Comm.		0.0			Unsatisfactory
MCI		0.0			Unsatisfactory
Metromedia/ITT		0.0			Unsatisfactory
Phone One		0.0			Unsatisfactory
National Telcom		0.0			Unsatisfactory
South Tel/ATC		0.0			Unsatisfactory
Sunshine		0.0			Unsatisfactory
TeleFibernet		0.0			Unsatisfactory
Telenational		0.0			Unsatisfactory
Touch One		0.0			Unsatisfactory
U.S. Sprint		0.0			Unsatisfactory
South Net		0.0			Unsatisfactory
H. Incorrectly Dialed Calls					
h. Incorrectly Dialed Calls	NP/ 95	93.3			8 Unsatisfactory
I. Availability of Service					
(1) Primary Service...3 day	90	100.0	X		
(2) Appointments	90	100.0	X		

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
May 11 thru July 17, 1992

Evaluation Summary

Continued

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
J. 911 Service					10
(1) Answer Time	95	98.2	X		
(2) 911 Service	NP/ 100	99.7			Unsatisfactory
K. Power Generators					11
k. Power and Generators	100	100.0	X		
L. Central Office					12
(1) Scheduled Routine Program	NP/ 95	100.0			Satisfactory
(2) Frame	NP/ 95	100.0			Satisfactory
(3) Facilities	NP/ 95	100.0			Satisfactory
M. Repair Service					13
(1) Appointments (OOS)	95	***			
(2) OOS Restoral-Same Day	NP/ 80	68.4			Unsatisfactory
(3) OOS Restoral-24 Hour	95	96.4	X		
(4) Rebates-Over 24 Hour	100	65.2		X	
(5) Restoral-72 Hours	95	95.8	X		
N. Rotary Test Numbers					14
3 Lines per Central Office	100	100.0	X		

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
May 11 thru July 17, 1992

Evaluation Summary

Continued

Category	FPSC Rule (%)	Evaluation Results (%)	Rule Satisfied		Exhibit Number
			Yes	No	
-----	-----	-----	---	---	-----
O. Transmission:					

(1) Central Office					

(a) Dial Tone Level	NP/ 100	100.0	Satisfactory		15A
(b) C.O. Loss	NP/ 100	100.0	Satisfactory		
(c) M.W. Frequency	NP/ 100	100.0	Satisfactory		
(d) C.O. Noise (Metallic)	NP/ 100	100.0	Satisfactory		
(e) C.O. Noise (Impulse)	NP/ 100	100.0	Satisfactory		
(2) Subscriber Loops					

(1) Subscriber Loops	NP/ 98	98.5	Satisfactory		15B
(3) IXC Inter LATA					15C

by carrier - next page					

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Evaluation Summary (Cont.)

Transmission - IXC Inter LATA

IXC Name	Metallic Noise	Impulse Noise	Insertion Loss	Rule Satisfied	Exhibit Number
-----	-----	-----	-----	-----	-----
	From Central Office....Azalea Park				15C
Biz Tel	13.0	2.0	6.4	Satisfactory	
Delta Comm.	10.0	0.0	5.6	Satisfactory	
National Telcom	17.0	0.0	6.0	Satisfactory	
South Net	14.0	0.0	5.6	Satisfactory	
	From Central Office....Sanford				
AT&T	11.5	0.0	6.2	Satisfactory	
Allnet Comm.	12.5	0.0	6.3	Satisfactory	
Cable/Wireless	17.0	0.0	7.5	Satisfactory	
South Tel/ATC	15.0	0.0	6.4	Satisfactory	
Phone One	13.5	0.0	6.3	Satisfactory	
Telenational	10.0	0.0	6.3	Satisfactory	
Touch One	11.5	1.0	6.3	Satisfactory	
South Net	12.5	1.0	6.5	Satisfactory	
Sunshine	14.5	0.0	9.5	Unsatisfactory	
TeleFibernet	13.0	0.0	6.3	Satisfactory	
U.S. Sprint	11.0	0.0	6.3	Satisfactory	
	From Central Office....Deltona				
Metromedia	13.0	0.0	6.5	Satisfactory	
MCI	11.0	0.0	6.4	Satisfactory	
	From Central Office....Sandlake				
U.S. Sprint	7.0	1.0	6.5	Satisfactory	

Evaluation parameters : Metallic Noise - 35dBm maximum
 Impulse Noise - 2 counts at 53 dBrc0 in 5 minutes
 Insertion Loss - 8 dB maximum

Southern Bell
 May 11 thru July 17, 1992

Evaluation Summary

 Continued

Category -----	FPSC Rule (%) -----	Evaluation Results (%) -----	Rule Satisfied		Exhibit Number -----
			Yes	No	
P. Safety -----					
(1) Adequate Grounding					16
(a) Recent Installations	NP/ 100	100.0	Satisfactory		
(b) Older Existing Loops	NP/ 92	100.0	Satisfactory		
(2) Safe Plant Condition					17
(a) From Service Evaluation			Satisfactory		
(b) Within the past 12 Months			Unsatisfactory		
Q. Periodic Report -----					
(1) Received Timely/Completely			Unsatisfactory		
(2) In Compliance with all Rules (From Report): -----					
(a) As Shown by Company			Unsatisfactory		
(3) Accuracy:					
(a) Report vs Service Eval.			Satisfactory		
R. Customer Complaints -----					
	State Avge		Company Avge		19
(1) Complaints/1000 lines	.186		.203		
S. Additional Observations, Suggestions and Comments:					
					Appendix 'B'

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Appendix A

Summary of Test Calls

Type of Call -----	Number of Calls -----
Dial Tone Delay	123500
Intra-Office	2400
Inter-Office	7348
EAS	10859
DDD-Intra-LATA	1083
DDD-Inter-LATA (IXC)	22872
Operator Answer Time	326
Directory Assistance	524
Repair Service	324
Business Office	369
Intercept	155
Pay Telephones-Serviceability	247
Timed Billing	457
Incorrectly Dialed	30
911 Service	702
Transmission (C.O.)	25
Subscriber Loops	259
IXC Transmission	18

Total Calls	171498

Southern Bell Telephone Co.
May 11 thru July 17, 1992

APPENDIX "B"

ADDITIONAL OBSERVATIONS, SUGGESTIONS AND COMMENTS

1. **Company Personnel:**

Staff found the company personnel generally to be friendly, helpful and service oriented. The company personnel assigned to assist the Commission staff were courteous and provided assistance in their area of expertise.

Management provided adequate work space and transportation assistance for the testing equipment.

2. **Professional Demeanor:**

All observed contacts with the company's customers by its employees were handled in a courteous and professional manner. Rule 25-4.041 is being complied with, both in spirit and substance.

3. **TDD: (Rule 25-4.079 & 25-4.073)**

The TDD operator and directory assistance services are provided by AT&T, and the answer time intervals spanned from 11 seconds to over 4 minutes. AT&T however, eventually answered all of the TDD calls. The business office and repair have the same telephone number for the TDD user. Of the 44 test calls staff initiated to the business office only 24 were answered; 16 were abandoned due to no company response to the TDD prompt. Two of the calls busied out - as a consequence only 59.1% of the calls were answered. See Exhibit 3D.

TDD 911 Emergency (Section 427.708)

911 emergency services failed to respond 27.3% of the time to TDD. Staff was unable to complete any TDD connection with Volusia County. They have the equipment, but are not sufficiently trained, or do not understand the importance of TDD. They pointed the failures to their phone equipment. Staff also had to abandon some calls (due to no response) in Orange County and Seminole County.

Staff found TDD services totally unacceptable. See Exhibit 10.

4. **Answer Times: (a) existing rules in effect
(b) as related to the new rules to take effect in November**

Southern Bell Telephone Co.
May 11 thru July 17, 1992

4. Answer Times continued:

(a) This 1992 evaluation seems to be a repeat of the 1991 report as the company failed to meet the answer time objectives on repair, and business office - see Exhibit 3. The percentages were lower than in the 1991 report. This evaluation found:

Repair answered within 20 seconds only 42.2% of the time.
The longest repair answer time exceeded 4-minutes.
Business Office answered only 1.1% of the calls within 20 seconds.
The longest business office answer time equaled 2-minutes; the shortest duration was 31-seconds.

Directory Assistance surpassed the PSC requirement of 90 with 98.3% answer completion within the allowable 20 seconds. This is commendable; however, the company needs to make immediate and dramatic improvement for business office and repair answer times.

(b) Recently Staff made ten test calls to the business office using the new answer time method as amended in Docket No.: 910506-TL (effective November - 92) and SBT answered 90.0%. However, extrapolating the data obtained in the evaluation, SBT would have made 64.6% under the new answer time method.

5. Safety and Plant Condition:

During this evaluation, Staff found the overall condition of the inside and outside plant to be in good safe condition with the exception of sixteen minor variances. The Company noted them and responded immediately to correct the service affecting potential by raising cables, closing open terminal lids and rearranging facilities away from power hazards.

The Bureau of Electric Safety has reported 305 safety variances pertaining to unsafe plant conditions for Southern Bell. Except where the Company disputes that there is a safety variance, the Company has responded with appropriate corrective action. With respect to the disputed variances, Staff is seeking an opinion from the NESC regarding the Company's practices.

Southern Bell Telephone Co.
May 11 thru July 17, 1992

6. LEC Payphones:

Company has shown a decline over the previous evaluation (1990). In the 1990 evaluation, six items did not meet the rules/standards. During this evaluation eight items were found deficient - see Exhibit 6. The automatic coin return failed to work properly on eight phones, there was no address on nine of the phones and 1.6 percent of the pay phones evaluated were not serviceable - not able to receive calls and/or have no dial tone - in effect out of service. Handicap compliance of 78.4% remains below rule of 100%. Staff acknowledges company's serious efforts in alleviating the discrepancies as they were found.

7. Rebate Objectives:

In the several preceding evaluations the company missed the 24 hour rebate objective. In the 1991 report staff found 76.9% compliance; this year the rebates were found to be only 65.2%. This trend can only suggest that company chooses to look at the rules differently than does the staff. Missed rebates reflect the company's opinion not to rebate on CPE regardless of the 24 hour Rule 25-4.070(1b).

8. Same Day Restoral:

Staff utilized a 3:00PM cutoff time in measuring the restoration of out of service during the same day. However, credit was given for any out of service that was reported after 3:00PM but restored the same day. The Company's results of 68.4% is below the objective of 80% cleared the same day. 96.4% of the out of service reports were restored within 24 hours which slightly exceeded the minimum of 95.0%.

Staff recommends that Company conform to the established guidelines by scheduling sufficient repair forces so that repairs can be made during the same day.

9. Consumer Complaints: Rule 25-4.022

Although complaints have been reduced in 1992 vs 1991, the year to date summary published by Consumer Affairs shows company above the industry average of consumer complaints and above the next two largest LECs. By the end of July, 925 complaints were registered; this averaged out to 0.203 complaints per one thousand customers, whereas the industry average equalled 0.186. In July there were 122 service complaints and 61 billing complaints for a total of 183 complaints. Of the 122 service complaints, 27 (22%) were delay connect complaints. See Rule 25-4.066.

Southern Bell Telephone Co.
May 11 thru July 17, 1992

With respect to delayed connection complaints, last year staff asked SBT what action it would take to reduce this category of complaints. At the time, according to our analysis, the delayed connections accounted for 22% of the total complaints against the company.

The company indicated that it would: (1) increase its construction activity; (2) re-evaluate the prioritization given to service provisioning; and (3) place additional emphasis on customer notification when due dates are not met. SBT implemented this program in November 1991; however, staff notes that in July 1992, delayed connections still represent 22% of the complaints against the company in the month prior to Hurricane Andrew.

In addition, staff, during this evaluation, was improperly billed for credit card third party calls, charges for DDD calls not placed by staff, and incorrect service connect charges. One explanation given was, "the Company was just a little slow in completing the disconnect service orders". Staff recommends these oversights be immediately corrected, for the new customer is not accountable for the previous calls or card holders charges.

10. Transmission:

The quality of transmission met the Commission's objective. The overall results of the subscriber loop tests are shown on Exhibit 15B. The staff's finding of 98.5 percent is satisfactory.

11. Adequacy of Intercept:

All numbers disconnected for non-pay were intercepted. However, not all of these disconnected numbers went to the recommended intercept announcement. Sixteen of the 58 disconnected numbers were routed to an announcement that said "This number is being checked for trouble". The recommended announcement is "The number you have reached xxx-xxxx has been temporarily disconnected".

SUMMARY:

In summary, this report finds in several areas (answer time for repair and business office), Southern Bell's service has declined over previous evaluations. Based on the proposed weighted index, Southern Bell Telephone had an index of 71.9 in their previous evaluation (1990) versus an index of 34.6 for this evaluation. However, if Southern Bell can improve their answer time to current standards their index would be above the 75 point minimum. Staff wants to see programs implemented that reverses the trend of decline for answer time.

Rule 25-4.071

EXHIBIT - 1

Dial Tone Delay

Central Office	NXX	Dial Tone Attempts	Delay Over 3 Seconds	% W/I 3 Seconds
-----	---	-----	-----	-----
Azalea Park	249	41100	28	99.9
Sanford	320	18900	2	99.9
Pine Hills	290	17400	1	99.9
Deltona	860	16700	0	100.0
Sandlake	345	29400	26	99.9
		-----	-----	-----
Company Totals		123500	57	99.9

Rule 25-04.071

EXHIBIT 2A

Call Completion by LEC

Central Office	NXX	Intra-Off.		Inter-Off.		EAS		Intra-Lata	
		Tot.:	Fail:	Tot.:	Fail:	Tot.:	Fail:	Tot.:	Fail:
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
Azalea Park	249	1000	0	2398	24	4320	9	583	14
Sanford	320	450	0	150	0	2129	9	268	4
Pine Hills	290	650	0	2452	32	2460	11	54	0
Deltona	860	50	0	0	0	510	1	178	2
Sandlake	345	250	1	2348	4	1440	0	0	0
		-----	-----	-----	-----	-----	-----	-----	-----
Company Totals		2400	1	7348	60	10859	30	1083	20

Completion Rate (%) 99.9 99.2 99.7 98.2

Overall Completion Rate 99.5

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
 By
 IXC and Central Office

AT&T

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	0	0	156	0	0	0	0	0
Pine Hills	372	10	0	0	460	0	412	3
Deltona	0	0	0	0	461	0	429	11
Company Totals	372	10	156	0	921	0	841	14
Completion Rate	97.3		100.0		100.0		98.3	

Overall Completion Rate 99.0 %

Allnet Comm.

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Pine Hills	0	0	160	7	0	0	0	0
Deltona	0	0	0	0	459	3	428	15
Company Totals	0	0	160	7	459	3	428	15
Completion Rate	***		95.6		99.3		96.5	

Overall Completion Rate 97.6 %

Biz Tel

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Azalea Park	372	6	0	0	461	6	431	16
Sanford	0	0	154	2	0	0	0	0
Company Totals	372	6	154	2	461	6	431	16
Completion Rate	98.4		98.7		98.7		96.3	

Overall Completion Rate 97.9 %

Southern Bell
May 11 thru July 17, 1992

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
By
IXC and Central Office

Cable/Wireless

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	0	0	160	1	0	0	429	8
Deltona	370	10	0	0	264	0	221	6
Company Totals	370	10	160	1	264	0	650	14
Completion Rate	97.3		99.4		100.0		97.8	

Overall Completion Rate 98.3 %

Delta Comm.

Azalea Park Sanford	372		156		461		431	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Azalea Park	372	4	0	0	461	11	431	6
Sanford	0	0	156	2	0	0	0	0
Company Totals	372	4	156	2	461	11	431	6
Completion Rate	98.9		98.7		97.6		98.6	

Overall Completion Rate 98.4 %

MCI

Pine Hills	372		161		461		431	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Pine Hills	372	10	161	2	461	1	431	5
Company Totals	372	10	161	2	461	1	431	5
Completion Rate	97.3		98.8		99.8		98.8	

Overall Completion Rate 98.7 %

Southern Bell
May 11 thru July 17, 1992

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
By
IXC and Central Office

Metromedia

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	0	0	162	0	0	0	0	0
Deltona	372	11	0	0	0	0	406	8
Company Totals	372	11	162	0	0	0	406	8
Completion Rate	97.0		100.0		***		98.0	

Overall Completion Rate 98.0 %

Phone One

Azalea Park	372	3	0	0	461	1	431	4
Deltona	0	0	161	1	0	0	0	0
Company Totals	372	3	161	1	461	1	431	4
Completion Rate	99.2		99.4		99.8		99.1	

Overall Completion Rate 99.4 %

National Telcom

Azalea Park	372	4	0	0	461	2	861	10
Sanford	0	0	140	0	0	0	0	0
Company Totals	372	4	140	0	461	2	861	10
Completion Rate	98.9		100.0		99.6		98.8	

Overall Completion Rate 99.1 %

Southern Bell
May 11 thru July 17, 1992

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
By
IXC and Central Office

South Net

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Azalea Park	0	0	0	0	460	0	421	8
Sanford	0	0	159	3	0	0	0	0
Pine Hills	372	10	0	0	461	3	431	16
Deltona	372	11	0	0	461	3	361	7
Company Totals	744	21	159	3	1382	6	1213	31
Completion Rate	97.2		98.1		99.6		97.4	

Overall Completion Rate 98.3 %

South Tel/ATC

	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	371	12	0	0	458	1	414	11
Pine Hills	0	0	159	2	0	0	0	0
Company Totals	371	12	159	2	458	1	414	11
Completion Rate	96.8		98.7		99.8		97.3	

Overall Completion Rate 98.1 %

Sunshine

	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	372	23	0	0	461	17	431	31
Pine Hills	0	0	160	10	0	0	0	0
Company Totals	372	23	160	10	461	17	431	31
Completion Rate	93.8		93.8		96.3		92.8	

Overall Completion Rate 94.3 %

Southern Bell
 May 11 thru July 17, 1992

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
 By
 IXC and Central Office

TeleFibernet

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	726	17	0	0	461	14	0	0
Pine Hills	0	0	161	6	0	0	0	0
Company Totals	726	17	161	6	461	14	0	0
Completion Rate	97.7		96.3		97.0		***	

Overall Completion Rate 97.3 %

Telenational

Sanford	372	4	0	0	0	0	0	0
Deltona	0	0	161	0	0	0	0	0
Company Totals	372	4	161	0	0	0	0	0
Completion Rate	98.9		100.0		***		***	

Overall Completion Rate 99.2 %

Touch One

Sandlake	0	0	0	0	0	0	431	12
Company Totals	0	0	0	0	0	0	431	12
Completion Rate	***		***		***		97.2	

Overall Completion Rate 97.2 %

Southern Bell
 May 11 thru July 17, 1992

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
 By
 IXC and Central Office

U.S. Sprint

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Sanford	0	0	160	2	0	0	0	0
Sandlake	372	3	0	0	461	3	0	0
Company Totals	372	3	160	2	461	3	0	0
Completion Rate	99.2		98.8		99.3		***	

Overall Completion Rate 99.2 %

Rule 25-4.073
 25-4.079

Exhibit 3A

Answer Times

Operator Service

Central Office	NXX	Total Calls	Busy &/ Failures	Total Ans.	Ans. W/I 10 Secs.	% Comp.	% Ans. W/I 10 Secs.
Azalea Park	249	31	0	31	30	100.0	96.8
Sanford	320	11	0	11	9	100.0	81.8
Pine Hills	290	15	0	15	12	100.0	80.0
Deltona	860	11	0	11	11	100.0	100.0
Sandlake	345	15	0	15	13	100.0	86.7
Pay Telephones	**	243	20	223	209	91.8	93.7
Company Totals		326	20	306	284	93.9	92.8

Overall Percentage (including failures)... 87.1 %

** Calls made from various NXX's

Rule 25-4.073
 25-4.079

Exhibit 3B

Answer Times

Directory Assistance

Central Office	NXX	Total Calls	Busy &/ Failures	Total Ans.	Total Ans. W/I 20 Secs	% Comp.	% Ans. W/I 20 Secs
-----	----	-----	-----	-----	-----	-----	-----
Azalea Park	249	31	0	31	31	100.0	100.0
Sanford	320	11	0	11	10	100.0	90.9
Pine Hills	290	15	0	15	15	100.0	100.0
Deltona	860	11	0	11	11	100.0	100.0
Sandlake	345	15	0	15	15	100.0	100.0
Business Office	345	194	0	194	192	100.0	99.0
Pay Telephones	**	243	0	243	241	100.0	99.2
TDDs	**	4	0	4	0	100.0	0.0
Company Totals		524	0	524	515	100.0	98.3

Overall Percentage (including failures)... 98.3 %

** Calls made from various NXX's

Southern Bell
 May 11 thru July 17, 1992

Exhibit DBM-4

Rule 25-4.073
 25-4.079

Exhibit 3C

Answer Times

Repair Service

Central Office	NXX	Total Calls	Busy &/ Failures	Total Ans.	Total Ans. W/I 20 Secs	% Comp.	% Ans. W/I 20 Secs
-----	---	-----	-----	-----	-----	-----	-----
Azalea Park	249	31	0	31	17	100.0	54.8
Sanford	320	11	0	11	8	100.0	72.7
Pine Hills	290	15	0	15	12	100.0	80.0
Deltona	860	11	0	11	5	100.0	45.5
Sandlake	345	15	0	15	10	100.0	66.7
Pay Telephones	**	241	5	236	92	97.9	39.0
Company Totals		324	5	319	144	98.5	45.1

Overall Percentage (including failures)... 44.4 %

** Calls made from various NXX's

Rule 25-4.073
 25-4.079

Exhibit 3D

Answer Times

Business Office (Combined)

Central Office	NXX	Total Calls	Busy &/ Failures	Total Ans.	Total Ans. W/I 20 Secs	% Comp.	% Ans. W/I 20 Secs
-----	---	-----	-----	-----	-----	-----	-----
Azalea Park	249	31	0	31	0	100.0	0.0
Sanford	320	11	0	11	0	100.0	0.0
Pine Hills	290	15	0	15	0	100.0	0.0
Deltona	860	11	0	11	0	100.0	0.0
Sandlake	345	15	0	15	0	100.0	0.0
Pay Telephones	**	239	0	239	2	100.0	0.8
TDDs	**	44	18	26	2	59.1	7.7
		-----	-----	-----	-----	-----	-----
Company Totals		366	18	348	4	95.1	1.1

Overall Percentage (including failures)... 1.1 %

** Calls made from various NXX's

EXHIBIT 4A

ADEQUACY OF DIRECTORY SERVICES

	In Compliance	
	YES	No
	---	--
A. Regularly Published (Within 15 Months)	X	
B. Name, Address, Numbers	X	
C. Second Listing Available Upon Request	X	
D. Listings in Alphabetical Order	X	
E. No Charge for Dual Listings	X	
F. Each Subscriber Provided One (1) Copy	X	
G. Reasonable Fee for Additional Copies	X	
H. Total Calling Area Listings Provided	X	
I. Name, Area, Month and Year Published	X	
J. Emergency Numbers Published	X	
K. PSC Block Prominently Displayed	X	
L. Instructions for Calling Loc & L.D	X	
M. Instructions for Calling Repair & D.A	X	
N. Instructions for Calling Bus. Office	X	
O. Instruct for Speech/Hearing Imp.	X	
P. TDD Info in front of Directory	X	
Q. TDD No Charge Option listed	X	
R. No charge for TDD UNPUB/UNLISTED #	X	
Total Areas Reviewed	18	
Total in Compliance	18	
In Compliance Percentage	100.0	

EXHIBIT 4A

ADEQUACY OF DIRECTORY SERVICES

	In Compliance	
	YES	No
	---	--
A. Regularly Published (Within 15 Months)	X	
B. Name, Address, Numbers	X	
C. Second Listing Available Upon Request	X	
D. Listings in Alphabetical Order	X	
E. No Charge for Dual Listings	X	
F. Each Subscriber Provided One (1) Copy	X	
G. Reasonable Fee for Additional Copies	X	
H. Total Calling Area Listings Provided	X	
I. Name, Area, Month and Year Published	X	
J. Emergency Numbers Published	X	
K. PSC Block Prominently Displayed	X	
L. Instructions for Calling Loc & L.D	X	
M. Instructions for Calling Repair & D.A	X	
N. Instructions for Calling Bus. Office	X	
O. Instruct for Speech/Hearing Imp.	X	
P. TDD Info in front of Directory	X	
Q. TDD No Charge Option listed	X	
R. No charge for TDD UNPUB/UNLISTED #	X	
Total Areas Reviewed	18	
Total in Compliance	18	
In Compliance Percentage	100.0	

EXHIBIT 4B

Adequacy of Directory Assistance

	Total Calls -----	Total Requests -----	Total Found -----	% Found -----
New Numbers - 48 Hours Old -----	137	137	137	100.0
Numbers from Directory -----	57	55	55	100.0
Company Total	----- 194	----- 192	----- 192	----- 100.0

Rule 25-4.074

EXHIBIT 5

Adequacy of Intercept Service

	Total Checked	--Intercept--		RNA	Failed	Busy	% Comp.
		Correct	Other				
Changed Number	48	48	0	0	0	0	100.0
Disc. Service	34	34	0	0	0	0	100.0
Vacation Disc.	0	0	0	0	0	0	N/A
Vacant # Group	20	18	0	0	0	2	90.0
Disc. Non Pay	58	42	16	0	0	0	100.0
Company Totals	160	142	16	0	0	2	98.8

Rule 25-4.076

Exhibit 6
 Public Pay Telephone Service
 Discrepancies Found

	No. Tested	No. Failed	% Sat.	Rule Satisfied	
				Yes	No
	-----	-----	-----	---	---
1 - Serviceability	304	5	98.4		X
2 - W'chair/Hearing Imp.	305	66	78.4		X
3 - Glass	302	0	100.0	Satisfactory	
4 - Door	0			N/A	
5 - Level	304	0	100.0	Satisfactory	
6 - Wiring	305	3	99.0	Satisfactory	
7 - Cleanliness	305	1	99.7	X	
8 - Lights	305	1	99.7		X
9 - Telephone Number	305	1	99.7		X
10 - Name or Logo	305	0	100.0	X	
11 - Adq. Enclosure	305	0	100.0	Satisfactory	
12 - Dial Instructions	305	1	99.7		X
13 - Transmission	298	1	99.7	Satisfactory	
14 - Dialing	298	0	100.0	Satisfactory	
15 - Coin Return (Auto)	294	8	97.3		X
16 - Coin Return (Opr)	293	10	96.6	Satisfactory	
17 - Opr. I.D. Coin	293	3	99.0	Satisfactory	
18 - IXC Access	298	0	100.0	X	
19 - Ring-back (Opr.)	296	13	95.6	Satisfactory	
20 - Coin Free (Operator)	299	0	100.0	X	
21 - Coin Free/Rtn (D.A.)	299	0	100.0	X	
22 - Coin Free (911)	280	0	100.0	X	
23 - Coin Free/Rtn(Repair)	299	0	100.0	X	
24 - Coin Free/Rtn(Bus Off)	279	0	100.0	X	
25 - Directory Current	302	5	98.3		X
26 - Directory Security	302	7	97.7	Satisfactory	
27 - Address/Location	301	9	97.0		X

Southern Bell
May 11 thru July 17, 1992

Exhibit DBM-4

Rule 25-4.077

EXHIBIT 7A

Intra-Lata Timing and Billing

Central Office -----	Timing Accuracy -----					Billed Per Tariff -----
	No. Calls	Under Timed	Over Timed	Correct No.	%	
Azalea Park	108	0	0	108	100	Yes

Credit Card Timing and Billing

Issued by -----	Timing Accuracy -----					Billed Per Tariff -----
	No. Calls	Under Timed	Over Timed	Correct No.	%	
ATT	54	0	0	54	100	Yes

Southern Bell
May thru July , 1992

Exhibit DBM-4

Rule 25-4.077
Rule 25-4.115

Exhibit 7B

Billing Accuracy
(Directory Assistance)

Central Office	Telephone Numbers	Total Calls	Allowance	Billable Calls	Billed Calls	Variance
		-----	-----	-----	-----	-----
Azalea Park	823-7811	31	3	28	28	0
Sanford	330-2409	11	3	8	8	0
Pine Hills	578-0952	15	3	12	12	0
Deltona	860-6257	11	3	8	8	0
Sandlake	363-7346	15	3	12	12	0
Business Office	352-3459	141	3	138	136	-2
	352-4661	18	3	15	16	1
	352-3564	37	3	34	32	-2
		-----	-----	-----	-----	-----
Company Totals		279	24	255	252	5

Percentage correctly billed 98.0 %

Exhibit 7C

Toll Timing and Billing Accuracy

(Inter LATA)

Inter-Exchange Carrier	No. Calls	Timing Accuracy				Billed Per Tariff
		Under Timed	Over Timed	Correct No.	%	
AT&T	54	0	0	54	100.0	Yes
Allnet Comm.	54	6	0	48	100.0	Yes
Biz Tel	54	No bills received			0.0	No
Cable/Wireless	54	0	2	52	96.3	No
Delta Comm.	54	0	0	54	100.0	Yes
MCI	54	0	0	54	100.0	Yes
Metromedia/ITT	54	0	0	54	100.0	Yes
Phone One	54	8	0	46	85.2	No
National Telcom	54	3	0	51	94.4	No
South Tel/ATC	54	5	0	49	90.7	No
Sunshine	54	0	8	46	85.2	No
TeleFibernet	54	0	0	54	100.0	Yes
Telenational	108	0	108	0	0.0	No
Touch One	108	4	0	104	96.3	No
U.S. Sprint	54	0	0	54	100.0	Yes
South Net	54	38	0	16	29.6	No

Note: Our tests to measure the timing of Toll Calls for billing purposes require that our calls be precisely timed to assure that the elapsed times are the same for each carrier's series of calls. To evaluate the accuracy of each network, all test calls are completed between our computerized testers to measure and record call duration and simultaneously disconnect and record disconnect time. The clock in each terminal is synchronized with the National Bureau of Standards time. Three calls are completed at each of the following intervals: 183, 181, 180, 179, 178, 123, 122, 121, 120, 119, 118, 63, 62, 61, 60, 59, and 58 seconds.

Bills for the calls are analyzed and compared to the records generated by our testers for origination and duration time. Our measurements are based entirely on available conversation time during the call regardless of how the company measures usage.

Exhibit 8

Incorrectly Dialed Calls

1 - Toll Access Not Dialed on Toll Calls

Central Office	NXX	Correct Response	Other	Failures		
				Fast	Slow	Operator
Azalea Park	249	X				
Sanford	320	X				
Pine Hills	290	X				
Deltona	860	X				
Sandlake	345	X				

2 - Toll Access and Invalid Office Code Dialed

Azalea Park	249	X			
Sanford	320	X			
Pine Hills	290			X	
Deltona	860	X			
Sandlake	345	X			

3 - Toll Access and Non-Working Area Code Dialed

Azalea Park	249	X			
Sanford	320	X			
Pine Hills	290			X	
Deltona	860	X			
Sandlake	345	X			

4 - Toll Access and Insufficient Digits Dialed

Azalea Park	249	X			
Sanford	320	X			
Pine Hills	290	X			
Deltona	860	X			
Sandlake	345	X			

Southern Bell
 May 11 thru July 17, 1992

Rule 25-4.071
 25-4.074

Exhibit 8 (Cont.)

Incorrectly Dialed Calls

5 - Toll Access Dialed on EAS Call

Central Office	NX	Correct Response	Other	Failures		
				Fast	Slow	Operator
Azalea Park	249	X				
Sanford	320	X				
Pine Hills	290	X				
Deltona	860		X			
Sandlake	345	X				

6 - Area Code Dialed on EAS Call

Azalea Park	249	X				
Sanford	320	X				
Pine Hills	290	X				
Deltona	860		X			
Sandlake	345	X				
Company Totals		26	2	2	0	0

In Compliance percentage 93.3

Rule 25-24.066
25-24.0770

Exhibit 9

Service Order Review - New Primary Service

Total Reviewed	Total Applicable	Total Delayed by Subscriber	3-Day Completion		Appointments		
			Total Required	Completed Total %	Total Made	Broken by LEC Total %	
48	48	14	34	34 100.0	4	0	0.0

EXHIBIT - 10

911 Service

Central Office	Total Calls	No. Busy	No. Fail	No. Ans.	Ans. W/I 10 Secs. (20 Sec/TDD)	% Comp.	% W/I 10 Secs. (20 Sec/TDD)
Azalea Park	31	0	0	31	30	100.0	96.8
Sanford	11	0	0	11	11	100.0	100.0
Pine Hills	15	0	0	15	14	100.0	93.3
Deltona	11	0	0	11	11	100.0	100.0
Sandlake	15	0	0	15	13	100.0	86.7
Pay Telephones	246	0	1	245	244	99.6	99.2
Company Totals	329	0	1	328	323	99.7	98.2
TDD's	22	0	6	16	1	72.7	4.5

Exhibit 11

Standby Power and
Emergency Generators

Central Office -----	NXX ---	Minimum 3-5 Hour Capacity		Standby Generator	
		Yes ---	No --	Fixed -----	Portable -----
Azalea Park	249	X		X	
Sanford	320	X		X	
Pine Hills	290	X		X	
Deltona	860	X		X	
Sandlake	345	X		X	

Rule 25-4.069

EXHIBIT 12

Central Office

Central Office -----	Scheduled Routine Program			Frame Sat -----	Facilities		
	NXX ---	Sat. -----	Unsat. -----		Unsat. -----	Sat. -----	Unsat. -----
Azalea Park	249	X		X		X	
Sanford	320	X		X		X	
Pine Hills	290	X		X		X	
Deltona	860	X		X		X	
Sandlake	345	X		X		X	

Rule 25-4.022
 25-4.070
 25-4.077
 25-4.110

EXHIBIT 13
 Repair Service Review

Trouble Report Summary

Reports Reviewed	S.A	Non S.A	OOS	Excl	24-Hr Repair		Rebates		Appointments		
					Due	Done	Due	Made	Made	N/AC	KEPT
630	166	53	411	0	411	396	23	15	0	0	0

Repair Summary

	Total	Same Day	W/I 24 Hrs	W/I 24-48 Hrs	Over 48 Hrs	W/I 72 Hrs	Over 72 Hrs
Out of Service	411	171	396	15	0	N/A	N/A
Service Affecting	166	59	N/A	N/A	N/A	159	7

Company Percentanges:

- (1) Appointments.... N/A
- (2) OOS Same Day.... 68.4 (Note)
- (3) OOS - 24 Hour... 96.4
- (4) Rebates..... 65.2
- (5) S.A. 72 Hours... 95.8

Note....This percentage takes into consideration that trouble reports received after 3:00 P.M are not used in the same day calculation (unless completed in the same day).

Southern Bell
May 11 thru July 17, 1992

Exhibit DBM-4

Rule 25-4.072

EXHIBIT 14

Milliwatt Test Numbers

Central Office -----	NXX ---	3-Line Rotary -----	
		Yes ---	No --
Azalea Park	249	X	
Sanford	320	X	
Pine Hills	290	X	
Deltona	860	X	
Sandlake	345	X	

In Compliance Percentage....100.0

Rule 25-4.072

EXHIBIT 15A

Transmission
 (Central Office)

Central Office	NXX	Dial Tone Level (-dBm)	Loss -dBm	Freq. (Hz)	Noise dBrnc	Impulse (5 Min.)
-----	-----	-----	-----	-----	-----	-----
Azalea Park	249	11.4	0.4	1004.0	14	0
Sanford	320	11.2	0.4	1004.0	13	0
Pine Hills	290	11.4	0.5	1004.0	13	0
Deltona	860	11.0	0.6	1004.1	10	0
Sandlake	345	9.5	0.4	1004.0	4	1
-----	-----	-----	-----	-----	-----	-----
In Compliance Percentage		100.0	100.0	100.0	100.0	100.0

PSC Proposed Limits

- Dial Tone..... -5 to -22 dBm
- C.O. Loss..... 0 to -2.5 dBm
- MW Frequency..... 994 to 1014 Hz.
- C.O. Noise (Metallic) 20 dBrnc0 or less
- C.O. Noise (Impulse) 5 counts or less in 5 minutes, at 59dBm
 2 counts or less in 5 minutes, at 53dBm
 (59 dBm for Electro-Mechanical offices)
 (53 dBm for Digital offices)

EXHIBIT 15B

Subscriber Loops

 (Excluding Grounds)

Central Office	NXX	Total Tested	No. Unsat.	No. Marginal	No. Sat.	% Unsat.	% Marginal	% Sat.
Azalea Park	249	27	0	2	25	0.0	7.4	92.6
Sanford	320	50	0	2	48	0.0	4.0	96.0
Pine Hills	290	2	0	0	2	0.0	0.0	100.0
Deltona	860	12	0	2	10	0.0	16.7	83.3
Sandlake	345	30	0	0	30	0.0	0.0	100.0
Orlando Main	220	26	0	3	23	0.0	11.5	88.5
Colonial	222	25	0	5	20	0.0	20.0	80.0
Debary	668	4	0	0	4	0.0	0.0	100.0
Geneva	349	2	0	0	2	0.0	0.0	100.0
Oviedo	359	28	2	8	18	7.1	28.6	64.3
Pine Castle	240	50	2	0	48	4.0	0.0	96.0
Lake Mary	333	3	0	0	3	0.0	0.0	100.0
Company Totals		259	4	22	233	1.5	8.5	90.0

Percentage Acceptable: 98.5

Objectives:

LOOP CURRENT: Sat. : > 20 ma (Except some carriers as low as 17 ma)
 Unsat.: < 20 ma (Except some carriers as low as 17 ma)

CURRENT TO GROUND: Expect I_g to be => 1.2 times I(1)

LOSS : Sat. 0.0 to 8.0.... NOISE (Nm): Sat. < 20 dBrcn0
 Marginal : 8.0 to 10.0 : Marginal: 21 to 26
 Unsat. : >10.0 : Unsat. > 26

POWER INFLUENCE : Sat. 0.0 to 80.... BALANCE: Sat. >60
 Marginal: 81 to 90 : Marginal: 50-60
 Unsat. : >90 : Unsat. < 50

Two marginal readings in Loss, Noise, and Power Influence = Unsat. Loop

EXHIBIT 15C

IXC Transmission

IXC Name	Telephone Number	Metallic Noise	Impulse Noise	Insertion Loss	Rule Satisfied	
					Yes	No
From Central Office....Azalea Park						
Biz Tel	273-3813	13.0	2.0	6.4	Satisfactory	
Delta Comm.	380-0932	10.0	0.0	5.6	Satisfactory	
National Telcom	380-0640	17.0	0.0	6.0	Satisfactory	
South Net	381-9333	14.0	0.0	5.6	Satisfactory	
From Central Office....Sanford						
AT&T	238-9014	11.5	0.0	6.2	Satisfactory	
Allnet Comm.	238-9311	12.5	0.0	6.3	Satisfactory	
Cable/Wireless	327-4027	17.0	0.0	7.5	Satisfactory	
South Tel/ATC	330-2336	15.0	0.0	6.4	Satisfactory	
Phone One	322-9017	13.5	0.0	6.3	Satisfactory	
Telenational	321-7927	10.0	0.0	6.3	Satisfactory	
Touch One	321-8333	11.5	1.0	6.3	Satisfactory	
South Net	327-8132	12.5	1.0	6.5	Satisfactory	
Sunshine	328-9412	14.5	0.0	9.5	Unsatisfactory	
TeleFibernet	324-3863	13.0	0.0	6.3	Satisfactory	
U.S. Sprint	321-7932	11.0	0.0	6.3	Satisfactory	
From Central Office....Deltona						
Metromedia	574-1777	13.0	0.0	6.5	Satisfactory	
MCI	860-6207	11.0	0.0	6.4	Satisfactory	
From Central Office....Sandlake						
U.S. Sprint	345-9371	7.0	1.0	6.5	Satisfactory	

Evaluation Parameters: Metallic Noise - 35dBm maximum
 Impulse Noise - 2 counts at 53 dBnc0 in 5 minutes
 Insertion Loss - 8 dB maximum

Rule 25-4.036
25-4.038
25-4.072

EXHIBIT 16

Ground Deficiencies

Location	NXX	Number of Loops Tested	Number with Poor Ground	Percentage with Defective Ground
Azalea Park	249	24	0	0.0
Sanford	320	48	0	0.0
Pine Hills	290	0	0	0.0
Deltona	860	12	0	0.0
Sandlake	345	28	0	0.0
Orlando Main	220	24	0	0.0
Colonial	222	24	0	0.0
Debary	668	4	0	0.0
Geneva	349	0	0	0.0
Oviedo	359	19	0	0.0
Pine Castle	240	48	0	0.0
Lake Mary	333	3	0	0.0
Company Totals (Older Loops)	234		0	0.0
Recent Installs	All	25	0	0.0

EXHIBIT 17

Safety

Grounding/Bonding

(1) Number of New Installations Evaluated for Grounding.....	25
(2) Number of New Installations with Satisfactory grounds.....	25
(3) Percentage of Satisfactory Grounds on New Installations....	100.0

General Practices

(4) Excluding New Installs, percent with Satisfactory grounds..	100.0
(5) Total number of LEC Pay Telephones evaluated.....	244
(6) Number of days observing Safety conditions and practices...	30
(7) Number of Central/Business/Repair Offices Evaluated.....	5
(8) Total Cable Route Miles observed for safety conditions.....	1290
(9) Percentage of Total Area evaluated for safety:	
(1) Less than 1 percent. (2) 1 to 5 percent	
(3) 5 to 10 percent. (4) Over 10 percent	
Select by number.....	1
10) Number of other Violations, Variances or Hazards observed...	16
11) Total Violations or Variances observed in last 12 months...	305
12) Safe Plant Condition	
(a) From Service Evaluation.....	Satisfactory
(b) Within the past 12 months.....	Unsatisfactory

EXHIBIT 17

Safety

Grounding/Bonding

(1) Number of New Installations Evaluated for Grounding.....	25
(2) Number of New Installations with Satisfactory grounds.....	25
(3) Percentage of Satisfactory Grounds on New Installations....	100.0

General Practices

(4) Excluding New Installs, percent with Satisfactory grounds..	100.0
(5) Total number of LEC Pay Telephones evaluated.....	244
(6) Number of days observing Safety conditions and practices...	30
(7) Number of Central/Business/Repair Offices Evaluated.....	5
(8) Total Cable Route Miles observed for safety conditions.....	1290
(9) Percentage of Total Area evaluated for safety:	
(1) Less than 1 percent.	(2) 1 to 5 percent
(3) 5 to 10 percent.	(4) Over 10 percent
Select by number.....	1
10) Number of other Violations, Variances or Hazards observed...	16
11) Total Violations or Variances observed in last 12 months...	305
12) Safe Plant Condition	
(a) From Service Evaluation.....	Satisfactory
(b) Within the past 12 months.....	Unsatisfactory

Rule 25-4.0185

EXHIBIT # 18

Periodic Report

Period Covered by PSC/CMU Form 28 Used: Second Quarter 1992

Complete Periodic Report forwarded in timely fashion ?....No

Sched -----	Title -----	Periodic Report Rule Satisfied		Service Evaluation Rule Satisfied	
		Yes ---	No --	Yes ---	No --
1	Timely Base Rate Area Survey Report	N/A		N/A	
2	Summary of Completed Svce Orders (New Svce)		X	X	
3	Summary of held Applications (New Svce)		X		X
4	Held Applications over 6 Months (New Svce)		X		X
5	Summary of Completed Svce Orders (Regrades)	N/A		N/A	
6	Summary of Held Applications (Regrades)	N/A		N/A	
7	Held Applications over 6 Months (Regrades)	N/A		N/A	
8	Access Lines Data	N/A		N/A	
9	Central Office Data - Dial Tone Delay	X		X	
10	Central Office Data - Class of Service	N/A		N/A	
11	Repair Service - Trouble Reports (1st Month)		X		X
11	Repair Service - Trouble Reports (2nd Month)		X		X
11	Repair Service - Trouble Reports (3rd Month)		X		X
13	Answer Time - Operator	X			X
14	Answer Time - Directory Assistance	X		X	
15	Answer Time - Repair Service		X		X
16	Answer Time - Business Office		X		X
17	Repair Service Appointments		X	***	
18	Service Order Appointments		X	X	
19	Central Office Data Base	X		X	
20	Equal Access and C.O.E.	X		X	
21	Capital Expenditure/Demand/Facilities Charts	N/A		N/A	

Any major difference noted between company's report
 and Staff's findings during the evaluation.....No

Note: *** indicates that the relevant item was not evaluated or that
 no pertinent data was found.

EXHIBIT - 19

Complaint Activity
 July 1992

	Complaints Logged in Month			Major Complaint Type	Complaints Closed in Month			Percent Justified
	Service	Billing	Total		Justification Yes	No	Some	
Company	122	61	183	Dly Conn	88	53	46	47.0
Industry	211	135	346	Dly Conn	172	98	81	49.0

Complaint Activity

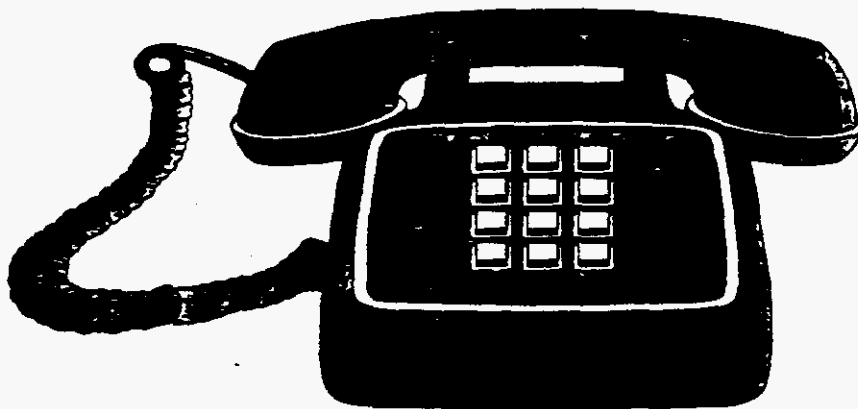
Year-to Date

	Current Year Total Recvd.	Percent Chng from Last Year	Complaints Per 1000 Access ln.	Justification Per 1000 Access lines
Company	925	-28	.203	.077
Industry Total	2060	-22	.186	.071

SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY

SERVICE EVALUATION

JULY 12 THRU SEPTEMBER 2, 1993



**DIVISION OF COMMUNICATIONS
FLORIDA PUBLIC SERVICE COMMISSION
NOVEMBER 5, 1993**

**ENGINEERS:
CLAUDE FORDE
ELTON HOWELL
THANG PHAM
FRANK WILLIAMSON**

Southern Bell
July 12 Thru Sept 2, 1993

TABLE OF CONTENTS

<u>CATEGORY</u>	<u>PAGE NO.</u>
Executive Summary	E.1-E.3
Evaluation Summary	S.1-S.5
Weighted Index	W.1-W.4
Exhibit 1-Dial Tone Delay	1.1
Exhibit 2A-Call Completion By LEC	2A.1
Exhibit 2B-Inter-LATA Call Completion	2B.1-2B.7
Exhibit 3-Incorrectly Dialed Calls	3.1-3.2
Exhibit 4-911 Service	4A.1-4B.1
Exhibit 5A-Transmission	5A.1
Exhibit 5B-Subscriber Loops	5B.1
Exhibit 5C-IXC Transmission	5C.1
Exhibit 6-Standby Power And Emergency Generators	6.1
Exhibit 7-Milliwatt Test Numbers	7.1
Exhibit 8-Central Office	8.1
Exhibit 9A-Answer Time-Operator Service	9A.1
Exhibit 9B-Answer Time-Directory Assistance	9B.1
Exhibit 9C-Answer Time-Repair Service	9C.1
Exhibit 9D-Answer Time-Business Office	9D.1-9D.2
Exhibit 10-Adequacy of Directory Services	10A.1-10B.1
Exhibit 11-Adequacy of Intercept Service	11.1
Exhibit 12A-Intra-LATA & Credit Card Timing Accuracy	12A.1
Exhibit 12B-Billing Accuracy-Directory Assistance	12B.1
Exhibit 13-Public Pay Telephone Service	13.1
Exhibit 14-Service Order Review	14.1
Exhibit 15-Repair Service Review	15.1
Exhibit 16-Complaint Activity	16.1
Exhibit 17-Ground Deficiencies	17.1
Exhibit 18-Safety	18.1
Exhibit 19-Periodic Report Review	19.1
Appendix A-Summary Of Test Calls	A.1

Southern Bell
July 12 Thru September 2, 1993

Executive Summary

General:

The company's score of 75.0 on the weighted index just meets the standard score of 75 points (see page W.4). While this is an improvement over the 68.4 points in the last evaluation, an analysis of the company's performance reveals that company must place greater emphasis on primary service installation time, timely restoral of interrupted service and rebates for service interruptions in accordance with FPSC standards.

ADDITIONAL OBSERVATIONS, SUGGESTIONS AND COMMENTS

1. Company Personnel:

Staff found the company's personnel to be friendly, helpful and service oriented. Personnel assigned to assist Commission staff were courteous and very knowledgeable. Management provided adequate work space and transportation assistance for test equipment.

2. Professional Demeanor:

All observed contacts between company's employees and customers were courteous and professional in accordance with Rule 25-4.041.

3. Subscriber Loops:

While the company's combined rating of 98.5% exceeds the PSC Rule of 95%, a close examination of Exhibit - 5B reveals the need for the company to focus greater attention to subscriber loops. The following areas had sub standard performance:

a) San Jose - 7 marginal readings in loop loss and power influence resulted in a 75.9% measurement.

b) Cantonment - 6 unsatisfactory and marginal readings in noise and power influence resulted in a 78.6% measurement.

c) Milton - 8 marginal readings in loss and power influence resulted in a 66.7% measurement.

d) Pace - 7 marginal readings in power influence resulted in a 73.1% measurement.

e) Callaway - 17 marginal and unsatisfactory readings in power influence resulted in a 39.3% measurement.

f) Panama City - 7 marginal and unsatisfactory readings in power influence and loss resulted in a 75% measurement.

4. Availability of Service and Repair:

Service availability fell from 100% in the last evaluation to 89.5%. This figure does not include 105 (14.3%) of the 733 requests reviewed in which the company maintains its customers requested a later installation date. The percentage of 14.3 appears high for customers requesting delayed installation. Since such requests are exempted in measuring the company's compliance with the three-day installation rule and the appointment rule, company should provide assurance in its response that adequate controls are in place to ensure that customers are not "led" into requesting a later installation date. Also, only 77% of the requests for a later installation date were satisfied. This is well below the standard applied for three-day service intervals. The company should place special emphasis on meeting the requested date; therefore, the company should address what corrective action is appropriate.

Company also missed the out of service objectives of 80% on same day restoral of all troubles received by 3 PM and 95% on 24 hour restoral. The evaluation results of 62% and 85.2% respectively were below the last evaluation results of 68.4% and 96.4%. Since these are key elements in the assessment of the quality of service that the subscriber receives, Staff expects company to meet these standards in all future evaluations. Since company has stated that they receive a large number of troubles after 3 PM, Staff recommends that they review the repair staffing and schedule to meet the demand.

5. Rebate Objectives:

Company has consistently missed the objective of 100% on rebates for service interruptions not restored within 24 hours, and for this evaluation the result was 83%. Staff has noted in this and other evaluations that company does not rebate CPE interruptions even though company failed to isolate the problem within 24 hours and notify or attempt to notify the customer. Staff considers this to be a violation of Rule 25-4.070(lb).

6. Public Pay Telephones:

Staff evaluated a total 453 payphones, and found the service to be generally good as is reflected in the failed column of Exhibit -13. However the number depicted as failing in the W'chair/Hearing Imp category excludes 9 which were grandfathered. Inclusion of the grandfathered 9, would change the percentage in this category from 98.5% to 96.5%, a figure which exceeds the last evaluation result of 78.4%. Staff therefore concludes that company's efforts in resolving payphone discrepancies are significant, however the company must make greater efforts to comply fully with Rule 25-4.076.

7. Consumer Complaints:

Company's average of 0.274 is above the State average of 0.243 complaints per 1000 access lines. Additionally, Staff reviewed 40 complaints received by the Division of Consumer Affairs and found no inconsistencies in the company's responses.

8. Safety:

Staff investigated 66 recent installations and found 1 with defective ground which resulted in a 98.5% rating. Since our standard requires 100%, this result was judged unsatisfactory. Additionally staff observed 10 safety variances during the evaluation and 102 were recorded against the company within the past 12 months. Company has indicated in writing that all variances are being addressed.

9. Periodic Report:

In its Second quarter periodic report to the Commission, the company acknowledged that it was not meeting the objective in completion of new services and in repairs. These facts have been substantiated in our evaluation as shown in Exhibits 14 and 15.

10. TDD:

Directory Assistance answer time for TDD was only 33% which is well below the requirement that 90% of all calls presented to D.A. be answered within 30 seconds of last digit dialed. Company must take necessary corrective actions to resolve this issue.

11. Answer Time:

Staff notes the company's improvement, over earlier evaluation, in this category. The company did not use its automated answering system for repair during our evaluation. This may account for the noted improvement on repair. The business office was still using the automated answer and was able to meet the new answer time objective.

12. Pensacola Plant Condition:

Contrary to the relatively well maintained plant in Jacksonville, staff noted significant irregularities in the Pensacola area. The power company had replaced their pole lines in 1989 and 1990 in many of the rural routes around Pensacola, and Southern Bell had not yet transferred their cable facilities leaving old poles next to the newer ones. This has created safety hazards by blocking the climbing spaces around new poles. Staff believes that Southern Bell should routinely coordinate efforts with the power companies and transfer their facilities in a timely manner.

Southern Bell
July 12 thru September 2 , 1993

Evaluation Summary

Category	FPSC Evaluation		Standard		Exhibit Number
	Standard (%)	Results (%)	Yes	No	
A. <u>Dial Tone Delay</u>					
(1) Dial Tone Delay	95	99.9	X		1
B. <u>Call Completions</u>					
(1) Intra-Office	95	99.9	X		2A
(2) Inter-Office	95	99.4	X		
(3) EAS	95	99.3	X		
(4) Intra-LATA	95	98.2	X		
(5) Inter-LATA - By Carrier	95	(See pages 2B.1-7)			2B
C. <u>Incorrectly Dialed Calls</u>					
(1) Incorrectly Dialed Calls	95	100.0	X		3
D. <u>911 Service</u>					
(1) Answer Time - Voice	90	100.0	X		4A
(2) Answer Time - TDD	90	60.0		X	4B
(3) Call Completions	100	100.0	X		4A
E. <u>Transmission</u>					
(1) <u>Central Office</u>					
(a) Dial Tone Level	100	100.0	X		5A
(b) C.O. Loss	100	100.0	X		
(c) M.W. Frequency	100	100.0	X		
(d) C.O. Noise (Metallic)	100	100.0	X		
(e) C.O. Noise (Impulse)	100	100.0	X		
(2) <u>Subscriber Loops</u>					
(a) Subscriber Loops	98	98.7	X		5B
(3) <u>Inter Exchange Carrier</u>					
(a) Inter LATA - By Carrier		(See page 5C.1)			5C

Southern Bell
July 12 thru September 2 , 1993

Evaluation Summary
(Continued)

Category	FPSC Standard (%)	Evaluation Results (%)	Standard Satisfied		Exhibit Number
			Yes	No	
<u>F. Power Generators</u>					
(1) Power Generators	100	100.0	X		6
<u>G. Rotary Test Numbers</u>					
(1) 3 Lines per Central Office	100	100.0	X		7
<u>H. Central Office</u>					
(1) Scheduled Routine Program	95	100.0	X		8
(2) Frame	95	100.0	X		
(3) Facilities	95	100.0	X		
<u>I. Answer Time</u>					
(1) Operator Answer Time	90	99.8	X		9A
(2) Directory Assistance	90	99.2	X		9B
(3) Repair Service	90	99.3	X		9C
(4) Business Office	85	95.5	X		9D
<u>J. Adequacy of Directory Services</u>					
(1) Directory Service	100	100.0	X		10A
(2) New Numbers	100	100.0	X		10B
(3) Numbers From Directory	99	100.0	X		10B
<u>K. Adequacy of Intercept Services</u>					
(1) Changed Numbers	90	100.0	X		11
(2) Disconnected Service	80	100.0	X		
(3) Vacation Disconnect	80	***			
(4) Vacant Numbers	80	100.0	X		
(5) Disconnects Non-Pay	100	100.0	X		

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

Southern Bell
 July 12 thru September 2 , 1993

Evaluation Summary
 (Continued)

Category	FPSC Evaluation		Standard Satisfied		Exhibit Number
	Standard (%)	Results (%)	Yes	No	
L. <u>Toll Timing and Billing Accuracy</u>					
(1) Intra - LATA	97	100.0	X		12A
(2) Directory Assistance	97	96.8		X	12B
(3) Credit Card	97	98.7	X		12A

Southern Bell
July 12 thru September 2 , 1993

Evaluation Summary
(Continued)

Category	FPSC	Evaluation	Standard		Exhibit
	Standard	Results	Satisfied	No	
	(%)	(%)	Yes	No	Number
M. Public Telephone Service					
<u>Each Exchange,</u>					
1 or more Pay Station	100	100.0	X		
(1) Serviceability	100	98.9		X	13
(2) W'chair/Hearing imp.	100	98.5		X	
(3) Glass	95	100.0	X		
(4) Door	95	100.0	X		
(5) Level	95	100.0	X		
(6) Wiring	95	100.0	X		
(7) Cleanliness	95	100.0	X		
(8) Lights	100	99.8		X	
(9) Telephone Number	100	100.0	X		
(10) Name or Logo	100	99.8		X	
(11) Enclosure	95	100.0	X		
(12) Dial Instructions	100	100.0	X		
(13) Transmission	95	98.7	X		
(14) Dialing	95	95.8	X		
(15) Coin Return (Auto)	100	99.3		X	
(16) Coin Return (Opr.)	95	95.8	X		
(17) Opr. I.D. Coins	95	98.4	X		
(18) IXC Access	100	95.1		X	
(19) Ring-back (Opr.)	95	99.1	X		
(20) Coin-free (Opr.)	100	100.0	X		
(21) Coin-free/rtn (D.A.)	100	100.0	X		
(22) Coin-free (911)	100	100.0	X		
(23) Coin-free/rtn (Repair)	100	100.0	X		
(24) Coin-free/rtn (Bus. Off)	100	100.0	X		
(25) Directories	100	95.8		X	
(26) Directory Security	95	96.5	X		
(27) Address/Location	100	99.3		X	

Southern Bell
July 12 thru September 2 , 1993

Evaluation Summary
(Continued)

Category	FPSC Standard (%)	Evaluation Results (%)	Standard Satisfied		Exhibit Number
			Yes	No	
<u>N. Availability of Service</u>					
(1) Primary Service (3 Day)	90	89.5		X	14
(2) Appointments	90	***			
<u>O. Repair Service</u>					
(1) Appointments (OOS)	95	100.0	X		15
(2) OOS Restoral (Same Day)	80	62.0		X	
(3) OOS Restoral (24 Hours)	95	85.2		X	
(4) Rebates (Over 24 Hours)	100	83.0		X	
(5) SA Restoral (72 Hours)	95	100.0	X		
<u>P. Customer Complaints</u>					
	State Average		Company Average		
(1) Complaints/1000 lines	0.243		0.274		16
<u>Q. Safety</u>					
(1) Adequate Grounding					
(a) Recent Installations	NP/100	98.5	Unsatisfactory		17
(b) Older Existing Loops	NP/ 92	99.2	Satisfactory		
(2) Safe Plant Condition					
(a) From Service Evaluation			Unsatisfactory		18
(b) Within the past 12 Months			Unsatisfactory		
<u>R. Periodic Report</u>					
(1) Received Timely/Completely			Satisfactory		19
(2) In Compliance with all rules (from Report)					
(a) As shown by Company			Unsatisfactory		
(3) Accuracy:					
(b) Report vs Service Evaluation			Satisfactory		

Note: 'NP', as used in this summary, indicates that no percentage is specified in the Rule. Target values chosen represent established standards or practical objectives.

Note: *** indicates that the relevant item was not evaluated or that no pertinent data was found.

WEIGHTED INDEX

EXHIBIT DBM-5

LECs NOT USING AN AUTOMATED ANSWERING SYSTEM(EXCEPT BUS OFC)

SOUTHERN BELL

REPORT DATE: NOVEMBER 5, 1993

DATES STUDIED: JULY 12 THRU SEPT 2, 1993

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
A. DIAL TONE DELAY					
DIAL TONE DEL +	95.0	99.9	1.1377	4.9	5.57
DIAL TONE DEL -	95.0		8.4935		
B. CALL COMPLETIONS					
INTRA-OFFICE +	95.0	99.9	0.0613	4.9	0.30
INTRA-OFFICE -	95.0		4.0136		
INTER-OFFICE +	95.0	99.4	0.0947	4.4	0.42
INTER-OFFICE -	95.0		2.1075		
EAS +	95.0	99.3	0.0280	4.3	0.12
EAS -	95.0		0.9953		
INTRA-LATA DDD +	95.0	98.2	0.1286	3.2	0.41
INTRA-LATA DDD -	95.0		1.0999		
C. INCORRECTLY DIALED CALLS					
INCORRECTLY DIALED +	95.0	100.0	0.1043	5.0	0.52
INCORRECTLY DIALED -	95.0		0.1043		
D. 911 SERVICE					
911 SERVICE -	100.0	100.0	2.8772		
E. TRANSMISSION					
DIAL TONE LEVEL -	100.0	100.0	0.0002		
CENTRAL OFFICE LOSS -	100.0	100.0	0.0002		
M.W. FREQUENCY -	100.0	100.0	0.0002		
CEN. OFF. NOISE METAL -	100.0	100.0	0.0002		
CEN. OFF. NOISE IMPLSE -	100.0	100.0	0.0002		
SUBSCRIBER LOOPS +	98.0	98.7	0.2788	0.7	0.20
SUBSCRIBER LOOPS -	98.0		0.1394		
F. POWER AND GENERATORS					
POWER & GENERATORS -	100.0	100.0	0.0798		
G. TEST NUMBERS					
TEST NUMBERS -	100.0	100.0	0.0010		

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
H. CENTRAL OFFICE					
SCHEDULED ROUTINE PROG +	95.0	100.0	0.0487	5.0	0.24
SCHEDULED ROUTINE PROG -	95.0		0.0487		
FRAME +	95.0	100.0	0.0549	5.0	0.27
FRAME -	95.0		0.0549		
FACILITIES +	95.0	100.0	0.0758	5.0	0.38
FACILITIES -	95.0		0.0758		
I. ANSWER TIME					
OPERATOR +	90.0	99.8	0.0519	9.8	0.51
OPERATOR -	90.0		0.3820		
DIRECTORY ASSISTANCE +	90.0	99.2	0.0519	9.2	0.48
DIRECTORY ASSISTANCE -	90.0		0.3820		
REPAIR SERVICE +	90.0	99.3	0.0519	9.3	0.48
REPAIR SERVICE -	90.0		0.3820		
BUSINESS OFFICE +	85.0	95.5	0.0805	10.5	0.85
BUSINESS OFFICE -	85.0		0.4191		
J. ADEQUACY OF DIR. AND DIR. ASSISTANCE					
DIRECTORY SERVICE -	100.0	100.0	0.0887		
NEW NUMBERS -	100.0	100.0	0.0399		
NUMBERS IN DIRECTORY +	99.0	100.0	0.2507	1.0	0.25
NUMBERS IN DIRECTORY -	99.0		0.5640		
K. ADEQUACY OF INTERCEPT SERVICES					
CHANGED NUMBERS +	90.0	100.0	0.1287	10.0	1.29
CHANGED NUMBERS -	90.0		0.3107		
DISCONNECTED SERVICE +	80.0	100.0	0.0489	20.0	0.98
DISCONNECTED SERVICE -	80.0		0.2151		
VACATION DISCONNECTS +	80.0		0.0322		
VACATION DISCONNECTS -	80.0		0.0586		
VACANT NUMBERS +	80.0	100.0	0.0277	20.0	0.55
VACANT NUMBERS -	80.0		0.2079		
DISCONNECTS NON-PAY -	100.0	100.0	0.1650		
L. TOLL TIMING AND BILLING ACCURACY					
INTRA-LATA BILL ACC. +	97.0	100.0	0.4290	3.0	1.29
INTRA-LATA BILL ACC. -	97.0		2.8560		
DIR. ASSIST. BILL ACC. +	97.0		0.4794		
DIR. ASSIST. BILL ACC. -	97.0	96.8	0.0766	-0.2	-0.02

EXHIBIT DBM-5

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
M. PUBLIC TELEPHONE SERICE					
1 PAY PHONE/ EXCHANGE -	100.0	100.0	0.0006		
SERVICEABILITY -	100.0	98.9	0.0864	-1.1	-0.10
HANDICAPPED ACCESS -	100.0	98.5	0.0112	-1.5	-0.02
GLASS +	95.0	100.0	0.0056	5.0	0.03
GLASS -	95.0		0.0056		
DOORS +	95.0	100.0	0.0051	5.0	0.03
DOORS -	95.0		0.0051		
LEVEL +	95.0	100.0	0.0076	5.0	0.04
LEVEL -	95.0		0.0062		
WIRING+	95.0	100.0	0.0060	5.0	0.03
WIRING -	95.0		0.0141		
CLEANLINESS +	95.0	100.0	0.0005	5.0	0.00
CLEANLINESS -	95.0		0.0362		
LIGHTS -	100.0	99.8	0.0224	-0.2	-0.00
TELEPHONE NUMBERS -	100.0	100.0	0.0523		
NAME OR LOGO -	100.0	99.8	0.0008	-0.2	-0.00
DIAL INSTRUCTIONS -	100.0	100.0	0.0864		
TRANSMISSION +	95.0	98.7	0.0266	3.7	0.10
TRANSMISSION -	95.0		0.0266		
DIALING +	95.0	95.8	0.0008	0.8	0.00
DIALING -	95.0		0.0062		
COIN RETURN AUTO -	100.0	99.3	0.0037	-0.7	-0.00
COIN RETURN OPER +	95.0	95.8	0.0178	0.8	0.01
COIN RETURN OPER -	95.0		0.0178		
OPERATOR ID COINS +	95.0	98.4	0.0002	3.4	0.00
OPERATOR ID COINS -	95.0		0.0302		
ACCESS ALL LD CARRIERS -	100.0	95.1	0.0024	-4.9	-0.01
RING BACK OPERATOR +	95.0	99.1	0.0002	4.1	0.00
RING BACK OPERATOR -	95.0		0.0302		
COIN FREE ACCESS OPER -	100.0	100.0	0.0097		
COIN FREE ACCESS D.A.-	100.0	100.0	0.0042		
COIN FREE ACCESS 911 -	100.0	100.0	0.0093		
COIN FREE ACCESS R.S.-	100.0	100.0	0.0034		
COIN FREE ACCESS B.O.-	100.0	100.0	0.0027		
DIRECTORY -	100.0	95.8	0.0013	-4.2	-0.01
DIRECTORY SECURITY +	95.0	96.5	0.0510	1.5	0.08
DIRECTORY SECURITY -	95.0		0.0510		
ADDRESS/LOCATION -	100.0	99.3	0.1252	-0.7	-0.09

EXHIBIT DBM-5

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
N. AVAILABILITY OF SERVICE					
3 DAY PRIMARY SERVICE +	90.0		0.0333		
3 DAY PRIMARY SERVICE -	90.0	89.5	0.2406	-0.5	-0.12
PRIM. SERV. APPOINTMNT +	95.0		0.1306		
PRIM. SERV. APPOINTMNT -	95.0		0.8125		
M. REPAIR SERVICE					
RESTORED-SAME DAY +	80.0		0.0909		
RESTORED-SAME DAY -	80.0	62.0	0.1319	-18.0	-2.37
RESTORED-24 HOUR +	95.0		0.3685		
RESTORED-24 HOUR -	95.0	85.2	1.3348	-9.8	-13.08
REPAIR APPOINTMENTS +	95.0	100.0	0.1318	5.0	0.66
REPAIR APPOINTMENTS -	95.0		0.1936		
REBATES OVER 24 HOURS -	100.0	83.0	0.0523	-17.0	-0.89
SERVICE AFFECTING-72 HRS +	95.0	100.0	0.1318	5.0	0.66
SERVICE AFFECTING-72HRS -	95.0		0.1936		
P. CUSTOMER COMPLAINTS					
	ST. AVE				
COMPLAINTS/ 1000 LINES +	0.22		0.3685		
COMPLAINTS/ 1000 LINES -	0.22	0.25	0.0000		EXC. AVG
BASE SCORE IF ALL STANDARDS ARE MET EXACTLY			75.00		75.00
SUM OF ADJUSTMENTS					0.04
OVERALL WEIGHTED SCORE (BASE + SUM OF ADJUSTMENTS)					75.04

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-04.071

EXHIBIT - 1**Dial Tone Delay**

<u>Central Office</u>	<u>NXX</u>	<u>Dial Tone Attempts</u>	<u>Delay Over 3 Seconds</u>	<u>% W/I 3 Seconds</u>
Fort Caroline	743	18236	11	99.9
Lake Forest	764	17232	1	99.9
Jax Beach	241	7828	80	99.0
San Jose	730	7373	12	99.8
Ferry Pass	478	4360	16	99.6
Warrington	455	43377	6	99.9
Panama City	763	16817	30	99.8
Panama Beach	230	15052	12	99.9
Company Total		130275	168	99.9

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-04.071

EXHIBIT - 2A**Call Completion by LEC**

Central Office	NXX	Intra-Off.		Inter-Off.		EAS		Intra-Lata	
		Tot.:	Fail:	Tot.:	Fail:	Tot.:	Fail:	Tot.:	Fail:
Fort Caroline	743	300	0	2892	16	1000	31	230	2
Lake Forest	764	700	0	200	11	660	5	460	8
Jax Beach	241	500	0	100	0	4546	19	301	7
San Jose	730	1104	0	8100	24	1408	7	328	15
Ferry Pass	478	700	5	2100	46	1400	20	238	0
Warrington	455	688	1	1700	2	500	0	112	2
Panama City	763	900	1	200	0	700	2	323	4
Panama Beach	230	701	0	0	0	1000	0	190	1
Company Totals		5593	7	15292	99	11214	84	2182	39
Completion Rate (%)		99.9		99.4		99.3		98.2	

Overall Completion Rate 99.3

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
By
IXC and Central Office**

Allnet Comm

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Ferry Pass	410	6	0	0	473	6	0	0
Warrington	0	0	369	13	494	10	400	5
Company Totals	410	6	369	13	967	16	400	5
Completion Rate	98.5		96.5		98.3		98.8	
	Overall Completion Rate				98.1 %			

Ameritel Nwk

Fort Caroline	356	3	350	2	0	0	299	2
Company Totals	356	3	350	2	0	0	299	2
Completion Rate	99.2		99.4		***		99.3	
	Overall Completion Rate				99.3 %			

ATC Long Dist

Ferry Pass	423	15	0	0	0	0	360	4
Warrington	0	0	365	10	494	11	0	0
Company Totals	423	15	365	10	494	11	360	4
Completion Rate	96.5		97.3		97.8		98.9	
	Overall Completion Rate				97.6 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
By
IXC and Central Office**

AT&T Comm

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Fort Caroline	355	7	343	3	496	14	299	5
Jax Beach	365	14	0	0	473	3	0	0
San Jose	400	2	337	4	475	12	0	0
Warrington	355	6	354	1	0	0	409	8
Company Totals	1475	29	1034	8	1444	29	708	13
Completion Rate	98.0		99.2		98.0		98.2	
	Overall Completion Rate				98.3 %			

Biz Tel Com

Lake Forest	356	4	0	0	496	9	299	4
Company Totals	356	4	0	0	496	9	299	4
Completion Rate	98.9		***		98.2		98.7	
	Overall Completion Rate				98.5 %			

Cable & Wireles

Jax Beach	366	10	0	0	494	15	354	6
Warrington	0	0	321	9	0	0	0	0
Company Totals	366	10	321	9	494	15	354	6
Completion Rate	97.3		97.2		97.0		98.3	
	Overall Completion Rate				97.4 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
By
IXC and Central Office**

ConQuest Corp

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Lake Forest	356	4	0	0	496	11	299	3
Ferry Pass	422	14	357	1	0	0	409	5
Warrington	0	0	338	4	0	0	0	0
Company Totals	778	18	695	5	496	11	708	8
Completion Rate	97.7		99.3		97.8		98.9	
	Overall Completion Rate				98.4 %			

Delta Comm

Fort Caroline	0	0	0	0	374	6	0	0
Ferry Pass	411	7	0	0	415	1	409	5
Warrington	356	4	413	10	0	0	408	3
Company Totals	767	11	413	10	789	7	817	8
Completion Rate	98.6		97.6		99.1		99.0	
	Overall Completion Rate				98.7 %			

L.D. America

Jax Beach	361	3	340	4	432	14	296	9
Company Totals	361	3	340	4	432	14	296	9
Completion Rate	99.2		98.8		96.8		97.0	
	Overall Completion Rate				97.9 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
By
IXC and Central Office**

MCI Telecom

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Warrington	422	10	366	10	496	10	398	1
Company Totals	422	10	366	10	496	10	398	1
Completion Rate	97.6		97.3		98.0		99.7	
	Overall Completion Rate				98.2 %			

Metromedia

Fort Caroline	335	5	344	12	0	0	0	0
Warrington	422	10	357	11	494	9	398	4
Company Totals	757	15	701	23	494	9	398	4
Completion Rate	98.0		96.7		98.2		99.0	
	Overall Completion Rate				97.8 %			

Metromedia L.D

Lake Forest	313	13	0	0	491	37	299	11
Ferry Pass	412	18	0	0	0	0	494	10
Warrington	0	0	321	11	487	29	0	0
Company Totals	725	31	321	11	978	66	793	21
Completion Rate	95.7		96.6		93.3		97.4	
	Overall Completion Rate				95.4 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
By
IXC and Central Office**

National Telcom

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Lake Forest	352	4	0	0	494	9	299	3
Warrington	410	1	357	2	494	13	410	13
Company Totals	762	5	357	2	988	22	709	16
Completion Rate	99.3		99.4		97.8		97.7	
	Overall Completion Rate				98.4 %			

Opticom/OCC

Warrington	410	4	357	3	992	19	354	5
Company Totals	410	4	357	3	992	19	354	5
Completion Rate	99.0		99.2		98.1		98.6	
	Overall Completion Rate				98.5 %			

SouthNet

Warrington	422	12	723	10	494	10	415	7
Company Totals	422	12	723	10	494	10	415	7
Completion Rate	97.2		98.6		98.0		98.3	
	Overall Completion Rate				98.1 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

Inter LATA Call Completion
By
IXC and Central Office

Sprint Comm

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Panama Beach	410	5	357	5	487	11	355	4
Company Totals	410	5	357	5	487	11	355	4
Completion Rate	98.8		98.6		97.7		98.9	
	Overall Completion Rate				98.4 %			

Telus Comm

Warrington	410	9	357	10	496	13	143	6
Company Totals	410	9	357	10	496	13	143	6
Completion Rate	97.8		97.2		97.4		95.8	
	Overall Completion Rate				97.3 %			

Touch One

Warrington	422	9	366	6	486	16	0	0
Company Totals	422	9	366	6	486	16	0	0
Completion Rate	97.9		98.4		96.7		***	
	Overall Completion Rate				97.6 %			

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-24.475

EXHIBIT - 2B

**Inter LATA Call Completion
 By
 IXC and Central Office**

Wiltel Inc

Central Office	AC - 305		AC - 407		AC - 813		AC - 904	
	Tot	Fail	Tot	Fail	Tot	Fail	Tot	Fail
Warrington	422	16	351	3	487	13	354	4
Company Totals	422	16	351	3	487	13	354	4
Completion Rate	96.2		99.1		97.3		98.9	
	Overall Completion Rate				97.8 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.071
25-4.074

EXHIBIT - 3

Incorrectly Dialed Calls

1 - Toll Access Not Dialed on Toll Calls

Central Office	NXX	Correct Response	Other	Failures		
				Fast	Slow	Operator
Fort Caroline	743	X				
Lake Forest	764	X				
Jax Beach	241	X				
San Jose	730	X				
Ferry Pass	478	X				
Warrington	455	X				
Panama City	763	X				
Panama Beach	230	X				

2 - Toll Access and Invalid Office Code Dialed

Fort Caroline	743	X
Lake Forest	764	X
Jax Beach	241	X
San Jose	730	X
Ferry Pass	478	X
Warrington	455	X
Panama City	763	X
Panama Beach	230	X

3 - Toll Access and Non-Working Area Code Dialed

Fort Caroline	743	X
Lake Forest	764	X
Jax Beach	241	X
San Jose	730	X
Ferry Pass	478	X
Warrington	455	X
Panama City	763	X
Panama Beach	230	X

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.071
25-4.074

Exhibit - 3 (Cont.)

Incorrectly Dialed Calls

4 - Toll Access and Insufficient Digits Dialed

Central Office	NXX	Correct Response	Other	Failures		
				Busy Fast	Slow	Operator
Fort Caroline	743	X				
Lake Forest	764	X				
Jax Beach	241	X				
San Jose	730	X				
Ferry Pass	478	X				
Warrington	455	X				
Panama City	763	X				
Panama Beach	230	X				

5 - Toll Access Dialed on EAS Call

Fort Caroline	743	X		
Lake Forest	764	X		
Jax Beach	241	X		
San Jose	730	X		
Ferry Pass	478	X		
Warrington	455		X	
Panama City	763	X		
Panama Beach	230	X		

6 - Area Code Dialed on EAS Call

Fort Caroline	743	X				
Lake Forest	764	X				
Jax Beach	241	X				
San Jose	730	X				
Ferry Pass	478		X			
Warrington	455		X			
Panama City	763	X				
Panama Beach	230	X				
Company Totals		45	3	0	0	0

In Compliance percentage 100.0

Southern Bell
 July 12 thru September 2 , 1993

F.S. 365.171
 F.S. 427.708

EXHIBIT - 4A**911 Service - Voice**

Central Office	Total Calls	No. Busy	No. Fail	No. Ans.	Ans. W/I 10 Secs.	% Comp.	% W/I 10 Secs.
Jax Beach	11	0	0	11	11	100.0	100.0
San Jose	40	0	0	40	40	100.0	100.0
Belmont	13	0	0	13	13	100.0	100.0
Ferry Pass	7	0	0	7	7	100.0	100.0
Warrington	12	0	0	12	12	100.0	100.0
Panama City	8	0	0	8	8	100.0	100.0
Panama Beach	4	0	0	4	4	100.0	100.0
Pay Telephones	448	0	0	448	448	100.0	100.0
Company Totals	543	0	0	543	543	100.0	100.0

Southern Bell
 July 12 thru September 2 , 1993

F.S. 365.171
 F.S. 427.708

EXHIBIT - 4B**911 Service - TDD**

Central Office	Total Calls	Bsy/ Fail	Aban- doned	No. Ans.	Ans. W/I 20 Secs.	% Comp.	% W/I 20 Secs.
Fort Caroline	3	0	1	2	2	100.0	100.0
Jax Beach	5	0	1	4	2	100.0	50.0
San Jose	41	0	2	39	21	100.0	53.8
Belmont	28	0	8	20	14	100.0	70.0
Warrington	2	0	0	2	1	100.0	50.0
Panama City	3	0	0	3	2	100.0	66.7
Company Totals	82	0	12	70	42	100.0	60.0

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.072

EXHIBIT - 5A

**Transmission
 (Central Office)**

Central Office	NXX	Dial Tone Level (-dBm)	Loss -dBm	Freq. (Hz)	Noise dBrnc	Impulse (5 Min.)
Fort Caroline	743	11.7	0.2	1004.0	9	0
Lake Forest	764	11.8	0.4	1011.0	0	0
Jax Beach	241	10.7	0.4	1004.0	4	0
San Jose	730	11.8	0.2	1004.0	12	0
Ferry Pass	478	11.5	0.5	1006.8	3	0
Warrington	455	11.1	0.0	1004.0	16	0
Panama City	763	11.0	0.0	1004.0	16	0
Panama Beach	230	11.1	0.5	1004.0	12	0
In Compliance Percentage		100.0	100.0	100.0	100.0	100.0

PSC Standard

Dial Tone..... -5 to -22 dBm
 C.O. Loss..... 0 to -2.5 dBm
 MW Frequency..... 994 to 1014 Hz.
 C.O. Noise (Metallic) 20 dBrnc0 or less
 C.O. Noise (Impulse) 5 counts or less in 5 minutes, at 59dBm
 2 counts or less in 5 minutes, at 53dBm
 (59 dBm for Electro-Mechanical offices)
 (53 dBm for Digital offices)

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.036
25-4.072

EXHIBIT - 5B

**Subscriber Loops
(Excluding Grounds)**

Central Office	NXX	Total Tested	No. Unsat.	No. Margin	No. Sat.	% Unsat.	% Margin	% Sat.
Arlington	721	26	1	2	23	3.8	7.7	88.5
Atlantic	221	11	0	0	11	0.0	0.0	100.0
Fort Caroline	743	29	0	0	29	0.0	0.0	100.0
Lemmon Wood	287	27	0	1	26	0.0	3.7	96.3
Mandarin	260	28	0	2	26	0.0	7.1	92.9
Jax Beach	241	20	0	1	19	0.0	5.0	95.0
San Jose	730	29	0	7	22	0.0	24.1	75.9
San Marco	398	30	0	0	30	0.0	0.0	100.0
San Pablo	223	16	0	0	16	0.0	0.0	100.0
Belmont	432	29	1	1	27	3.4	3.4	93.1
Cantonment	968	28	3	3	22	10.7	10.7	78.6
Ferry Pass	478	30	0	2	28	0.0	6.7	93.3
Gulf Breeze	932	28	0	1	27	0.0	3.6	96.4
Hillcrest	944	29	0	4	25	0.0	13.8	86.2
Milton	623	24	0	8	16	0.0	33.3	66.7
Pace	994	26	0	7	19	0.0	26.9	73.1
Warrington	455	29	0	0	29	0.0	0.0	100.0
Callaway	871	28	0	17	11	0.0	60.7	39.3
Panama City	763	28	1	6	21	3.6	21.4	75.0
Panama Beach	230	26	0	3	23	0.0	11.5	88.5
Youngstown	722	28	1	4	23	3.6	14.3	82.1
Company Totals		549	7	69	473	1.3	12.6	86.2

Percentage Acceptable: 98.7

Objectives:

LOOP CURRENT: Sat. : > 20 ma (Except some carriers as low as 17 ma)
Unsat.: < 20 ma (Except some carriers as low as 17 ma)

CURRENT TO GROUND: Expect Ig to be => 1.2 times I(1)

LOSS : Sat. 0.0 to 8.0.... NOISE (Nm): Sat. < 20 dBmco
Marginal : 8.0 to 10.0 : Marginal: 21 to 26
Unsat. : >10.0 : Unsat. > 26

POWER INFLUENCE : Sat. 0.0 to 80.... BALANCE: Sat. >60
Marginal: 81 to 90 : Marginal:50-60
Unsat. :>90 : Unsat. < 50

Two marginal readings in Loss, Noise, and Power Influence = Unsat. Loop

Southern Bell
 July 12 thru September 2 , 1993

EXHIBIT - 5C**IXC Transmission**

IXC Name	Telephone Number	Metallic Noise	Impulse Noise	Insert -ion Loss	Rule Satisfied	
					Yes	No
From Central Office....Jax Beach						
AT&T Comm	241-7862	4.0	0	6.0	Satisfactory	
Sprint Comm	249-2889	4.8	0	5.9	Satisfactory	
From Central Office....Warrington						
Allnet Comm	457-2162	12.0	0	5.9	Satisfactory	
From Central Office....Panama City						
Wiltel Inc	763-5072	14.0	0	6.2	Satisfactory	
From Central Office....Panama Beach						
Allnet Comm	234-8931	9.5	0	6.5	Satisfactory	
ATC Long Dist	234-8968	10.0	0	6.5	Satisfactory	

Evaluation Parameters:

Metallic Noise - 35dBm maximum Insertion Loss - 8 dB maximum
 Impulse Noise - 2 counts at 53 dBm in 5 minutes

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.078

EXHIBIT - 6**Standby Power and Emergency Generators**

Central Office	NXX	Minimum 3-5 Hour Capacity		Standby Fixed	Generator Portable
		Yes	No		
Fort Caroline	743	X		X	
Lake Forest	764	X		X	
Jax Beach	241	X		X	
San Jose	730	X		X	
Ferry Pass	478	X		X	
Warrington	455	X		X	
Panama City	763	X		X	
Panama Beach	230	X		X	

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.072

EXHIBIT - 7**Milliwatt Test Numbers**

Central Office	NXX	3-Line Rotary	
		Yes	No
Fort Caroline	743	X	
Lake Forest	764	X	
Jax Beach	241	X	
San Jose	730	X	
Ferry Pass	478	X	
Warrington	455	X	
Panama City	763	X	
Panama Beach	230	X	

In Compliance Percentage....100.0

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.069

EXHIBIT - 8

Central Office

Central Office	NXX	Scheduled Routine Program		Frame		Facilities	
		Sat.	Unsat.	Sat	Unsat.	Sat.	Unsat.
Fort Caroline	743	X		X		X	
Lake Forest	764	X		X		X	
Jax Beach	241	X		X		X	
San Jose	730	X		X		X	
Ferry Pass	478	X		X		X	
Warrington	455	X		X		X	
Panama City	763	X		X		X	
Panama Beach	230	X		X		X	

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.073
 25-4.079

EXHIBIT - 9A

Answer Times

Operator Service

Central Office	NXX	Total Calls	Busy &/ Fail.	Total Ans.	Ans. W/I 30 Secs.	% Comp.	% Ans. W/I 30 Secs.
Jax Beach	241	11	0	11	11	100.0	100.0
San Jose	730	41	1	40	40	97.6	100.0
Ferry Pass	478	7	0	7	7	100.0	100.0
Warrington	455	16	0	16	16	100.0	100.0
Panama City	763	8	0	8	8	100.0	100.0
Panama Beach	230	4	0	4	4	100.0	100.0
Business Office	780	14	2	12	12	85.7	100.0
Pay Telephones	XXX	448	0	448	447	100.0	99.8
Company Totals		549	3	546	545	99.5	99.8

Overall Percentage (including failures)... 99.3 %

** Calls made from various NXX's

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.073
25-4.079

EXHIBIT - 9B**Answer Times****Directory Assistance**

Central Office	NXX	Total Calls	Busy &/ Fail.	Total Ans.	Total Ans. W/I 30 sec	% Comp.	% Ans. W/I 30 sec
Jax Beach	241	11	0	11	11	100.0	100.0
San Jose	730	41	1	40	40	97.6	100.0
Ferry Pass	478	7	0	7	7	100.0	100.0
Warrington	455	16	0	16	16	100.0	100.0
Panama City	763	8	0	8	8	100.0	100.0
Panama Beach	230	4	0	4	4	100.0	100.0
Business Office	***	354	6	348	348	98.3	100.0
Pay Telephones	**	448	0	448	441	100.0	98.4
Voice Totals		889	7	882	875	99.2	99.2
TDD Totals		86	0	86	29	100.0	33.7

Overall Percentage - Excluding TDD's and including failures... 98.4 %

** Calls made from various NXX's

*** Calls made from Pensacola and Jax Business Offices

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.073
25-4.079

EXHIBIT - 9C**Answer Times****Repair Service - Combined**

Central Office	NXX	Total Calls	Busy &/ Fail.	Total Ans.	Total Ans. W/I 30 sec	% Comp.	% Ans. W/I 30 sec
Jax Beach	241	11	0	11	11	100.0	100.0
San Jose	730	41	0	41	40	100.0	97.6
Ferry Pass	478	7	0	7	7	100.0	100.0
Warrington	455	16	0	16	16	100.0	100.0
Panama City	763	8	0	8	8	100.0	100.0
Panama Beach	230	4	1	3	3	75.0	100.0
Business Office	780	13	1	12	12	92.3	100.0
Pay Telephones	XXX	448	0	448	445	100.0	99.3
Voice Totals		548	2	546	542	99.6	99.3
TDD Totals		0	0	0	0	0.0	0.0

Overall Percentage - Excluding TDD's and including failures... 98.9 %

** Calls made from various NXX's

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.073
 25-4.079

EXHIBIT - 9D**Answer Times****Business Office - Business**

Central Office	NXX	Total Calls	Busy &/ Fail.	Total Ans.	Total Ans. W/I 15 sec	% Comp.	% Ans. W/I 15 sec
Jax Beach	241	6	0	6	6	100.0	100.0
San Jose	730	18	2	16	13	88.9	81.3
Ferry Pass	478	4	0	4	4	100.0	100.0
Warrington	455	8	0	8	7	100.0	87.5
Panama City	763	2	0	2	2	100.0	100.0
Panama Beach	230	3	1	2	2	66.7	100.0
Business Office	780	5	0	5	5	100.0	100.0
Pay Telephones	XXX	224	0	224	216	100.0	96.4
Voice Totals		270	3	267	255	98.9	95.5
TDD Totals		0	0	0	0	0.0	0.0

Overall Percentage - Excluding TDD's and including failures... 94.4 %

** Calls made from various NXX's

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.073
25-4.079

EXHIBIT - 9D**Answer Times****Business Office - Residence**

Central Office	NXX	Total Calls	Busy &/ Fail.	Total Ans.	Total Ans. W/I 15 sec	% Comp.	% Ans. W/I 15 sec
Jax Beach	241	5	1	4	4	80.0	100.0
San Jose	730	21	1	20	17	95.2	85.0
Ferry Pass	478	3	0	3	3	100.0	100.0
Warrington	455	8	0	8	8	100.0	100.0
Panama City	763	6	0	6	6	100.0	100.0
Panama Beach	230	1	0	1	1	100.0	100.0
Business Office	780	6	0	6	6	100.0	100.0
Pay Telephones	XXX	224	0	224	215	100.0	96.0
Voice Totals		274	2	272	260	99.3	95.6
TDD Totals		89	6	83	71	93.3	85.5

Overall Percentage - Excluding TDD's and including failures... 94.9 %

** Calls made from various NXX's

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.040
 25-4.079

EXHIBIT - 10A

ADEQUACY OF DIRECTORY SERVICES

In Compliance

	<u>YES</u>	<u>No</u>
A. Regularly Published (Within 15 Months)	X	
B. Name, Address, Numbers	X	
C. Second Listing Available Upon Request	X	
D. Listings in Alphabetical Order	X	
E. No Charge for Dual Listings	X	
F. Each Subscriber Provided One (1) Copy	X	
G. Reasonable Fee for Additional Copies	X	
H. Total Calling Area Listings Provided	X	
I. Name, Area, Month and Year Published	X	
J. Emergency Numbers Published	X	
K. PSC Block Prominently Displayed	X	
L. Instructions for Calling Loc & L.D	X	
M. Instructions for Calling Repair & D.A	X	
N. Instructions for Calling Bus. Office	X	
O. Instruct for Speech/Hearing Imp.	X	
P. TDD Info in front of Directory	X	
Q. Notation on TDD user listing at No Extra Charge	X	
R. No charge for TDD UNPUB/UNLISTED #	X	
Total Areas Reviewed	18	
Total in Compliance	18	
In Compliance Percentage	100.0	

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.040

EXHIBIT - 10B

Adequacy of Directory Assistance

	Total Calls	Total Requests	Total Found	% Found
New Numbers - 48 Hours Old	253	231	231	100.0
Numbers from Directory	102	95	95	100.0
Company Total	355	326	326	100.0

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.074

EXHIBIT - 11**Adequacy of Intercept Service**

	<u>Total</u> <u>Checked</u>	<u>--Intercept--</u>		<u>RNA</u>	<u>Failed</u>	<u>Busy</u>	<u>% Comp.</u>
		<u>Correct</u>	<u>Other</u>				
Changed Number	97	97	0	0	0	0	100.0
Disc. Service	60	60	0	0	0	0	100.0
Vacation Disc.	0	0	0	0	0	0	N/A
Vacant # Group	253	253	0	0	0	0	100.0
Disc. Non Pay	135	135	0	0	0	0	100.0
Company Total	545	545	0	0	0	0	100.0

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.077

EXHIBIT - 12A**Intra-Lata Timing and Billing**

Central Office	Timing Accuracy					OBJ. MET	Billed Per Tariff
	No. Calls	Under Timed	Over Timed	Correct No.	%		
San Jose	108	0	0	108	100.0	Yes	Yes
Warrington	54	0	0	54	100.0	Yes	Yes
Panama City	54	0	0	54	100.0	Yes	Yes
Panama Beach	54	0	0	54	100.0	Yes	Yes
Company Totals	270	0	0	270	100.0	Yes	Yes

Credit Card Timing and Billing

Credit Card #	Timing Accuracy					OBJ. MET	Billed Per Tariff
	No. Calls	Under Timed	Over Timed	Correct No.	%		
904-396-2932	69	0	1	68	98.6	Yes	No
904-398-9802	39	0	1	38	97.4	Yes	No
904-432-2047	45	0	0	45	100.0	Yes	Yes
Company Totals	153	0	2	151	98.7	Yes	No

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.077
 Rule 25-4.115

Exhibit 12B

**Billing Accuracy
 (Directory Assistance)**

Central Office	Telephone Numbers	Total Calls	Allow- ance	Billable Calls	Billed Calls	Variance
Jax Beach	241-8287	11	3	8	8	0
San Jose	733-5099	28	3	25	15	-10
	733-4497	13	3	10	10	0
Belmont	435-1560	66	3	63	63	0
Ferry Pass	474-6229	7	3	4	3	-1
Warrington	455-2467	8	3	5	5	0
	455-1863	8	3	5	6	1
Panama City	763-9752	8	3	5	5	0
Panama Beach	234-8756	4	3	1	0	-1
Business Office	398-9802	18	3	15	15	0
	398-9809	31	3	28	28	0
	398-9836	18	3	15	15	0
	398-9836	118	3	115	115	0
	432-2193	116	3	113	113	0
Company Totals		454	42	412	401	13
Percentage correctly billed			96.8 %			

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.076

EXHIBIT - 13

Public Pay Telephone Service
Discrepancies Found

	Number Tested	Number Failed	% Sat.	Rule Satisfied	
				Yes	No
1 - Serviceability	453	5	98.9		X
2 - W'chair/Hearing Imp.	453	7	98.5		X
3 - Glass	453	0	100.0	Satisfactory	
4 - Door	453	0	100.0	Satisfactory	
5 - Level	453	0	100.0	Satisfactory	
6 - Wiring	453	0	100.0	Satisfactory	
7 - Cleanliness	453	0	100.0	X	
8 - Lights	453	1	99.8		X
9 - Telephone Number	453	0	100.0	X	
10 - Name or Logo	453	1	99.8		X
11 - Adq. Enclosure	453	0	100.0	Satisfactory	
12 - Dial Instructions	453	0	100.0	X	
13 - Transmission	448	6	98.7	Satisfactory	
14 - Dialing (Dial Pad)	448	19	95.8	Satisfactory	
15 - Coin Return (Auto)	448	3	99.3		X
16 - Coin Return (Opr.)	448	19	95.8	Satisfactory	
17 - Opr. I.D. Coin	448	7	98.4		X
18 - IXC Access	448	22	95.1		X
19 - Ring Back (Opr.)	448	4	99.1		X
20 - Coin Free (Opr.)	448	0	100.0	X	
21 - Coin Free/rtn (D.A.)	448	0	100.0	X	
22 - Coin Free (911)	448	0	100.0	X	
23 - Coin Free/rtn (Rpr.)	448	0	100.0	Satisfactory	
24 - Coin Free/rtn (Bus.Off)	448	0	100.0	X	
25 - Directories	453	19	95.8	Satisfactory	
26 - Directory Security	453	16	96.5		X
27 - Address/Location	453	3	99.3	Satisfactory	

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-24.066
 25-24.077

EXHIBIT - 14

Service Order Review - New Primary Service

Total Re- viewed	Total App- licable	Total Delayed by Subscriber	Completions			Appointments		
			Total Required	Completed Total	%	Total Made	Broken by LEC Total	%
736	733	105	628	562	89.5	0	0	N/A

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.022
 25-4.070
 25-4.077
 25-4.110

EXHIBIT - 15

Repair Service Review

Trouble Report Summary

Appointments

Reports Reviewed	S.A	Non S.A	OOS	Excl	24-hrs Repair		Rebates		Total Made	Broken by LEC	
					Due	Done	Due	Made		Total	%
444	86	60	298	0	298	254	47	39	11	0	0

Repair Summary

	Total	Same Day	W/I 24 Hrs	W/I 24-48 Hrs	Over 48 Hrs	W/I 72 Hrs	Over 72 Hrs
Out of Service	298	127	254	44	0	N/A	N/A
Service Affecting	86	20	N/A	N/A	N/A	86	0

Company Percentages:

- (1) Appointments....100.0
- (2) OOS Same Day.... 62.0 (Note)
- (3) OOS - 24 Hour... 85.2
- (4) Rebates..... 83.0
- (5) S.A. 72 Hours...100.0

Note....This percentage takes into consideration that trouble reports received after 3:00 P.M are not used in the same day calculation (unless completed in the same day).

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.111

EXHIBIT - 16

Complaint Activity
September 1993

	<u>Complaints Logged in Month</u>			Major Complaint Type	<u>Complaints Closed in Month</u>			
	Service	Billing	Total		Justification Yes	No	Some	Percent Justified
Company	110	21	131	Outage	64	40	30	48.0
Industry	165	44	209	Outage	103	67	50	47.0

Complaint Activity
Past 12 Months

	<u>Current Year Total Recvd.</u>	<u>Percent Chng from Last Year</u>	<u>Complaints Per 1000 Access ln.</u>	<u>Justification Per 1000 Access lines</u>
Company	1277	8	0.274	0.121
Industry Total	1948	32	0.243	0.101

Southern Bell
 July 12 thru September 2 , 1993

Rule 25-4.036
 25-4.038
 25-4.072

EXHIBIT - 17

Ground Deficiencies

<u>Location</u>	<u>NXX</u>	<u>Number of Loops Tested</u>	<u>Number with Poor Ground</u>	<u>Percentage with Defective Ground</u>
Lemmon Wood	287	24	0	0.0
Mandarin	260	24	0	0.0
San Jose	730	24	0	0.0
San Marco	398	24	0	0.0
Belmont	432	24	1	4.2
Cantonment	968	24	0	0.0
Ferry Pass	478	24	1	4.2
Gulf Breeze	932	24	0	0.0
Hillcrest	944	24	0	0.0
Milton	623	19	0	0.0
Pace	994	22	0	0.0
Warrington	455	24	0	0.0
Callaway	871	24	0	0.0
Panama City	763	24	0	0.0
Panama Beach	230	20	1	5.0
Youngstown	722	24	0	0.0
Company Totals (Older Loops)		373	3	0.8
Recent Installs		66	1	1.5

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.038

EXHIBIT - 18**Safety**Grounding/Bonding

(1) Number of New Installations Evaluated for Grounding.....	66
(2) Number of New Installations with Unsatisfactory grounds....	1
(3) Percentage of Satisfactory Grounds on New Installations....	98.5

General Practices

(4) Excluding New Installs, percent with Satisfactory grounds..	99.2
(5) Total number of LEC Pay Telephones evaluated.....	453
(6) Number of days observing Safety conditions and practices...	40
(7) Number of Central/Business/Repair Offices Evaluated.....	23
(8) Total Cable Route Miles observed for safety conditions.....	650
(9) Percentage of Total Area evaluated for safety:	
(1) Less than 1 percent. (2) 1 to 5 percent	
(3) 5 to 10 percent. (4) Over 10 percent	
Select by number.....	2
10) Number of other Violations, Variances or Hazards observed...	10
11) Total Violations or Variances observed in last 12 months...	105
12) Safe Plant Condition	
(a) From Service Evaluation.....Unsatisfactory	
(b) Within the past 12 months.....Unsatisfactory	

Southern Bell
July 12 thru September 2 , 1993

Rule 25-4.0185

EXHIBIT - 19**Periodic Report**

Period Covered by PSC/CMU Form 28 Used: Second Quarter 1993

Complete Periodic Report forwarded in timely fashion ?....Yes

Sched	Title	Periodic Report		Service Evaluation	
		Rule Sat. Yes	Rule Sat. No	Rule Sat. Yes	Rule Sat. No
1	Timely Base Rate Area Survey Report	X		(1)	
2	Summary of Completed Svce Orders(New Svce)		X		X
3	Summary of held Applications (New Svce)	X		(1)	
4	Held Applications over 6 Months (New Svce)	X		(1)	
8	Access Lines Data	X		X	
9	Central Office Data - Dial Tone Delay	X		X	
11	Repair Service - Trouble Reports		X		X
13	Answer Time - Operator	X		X	
14	Answer Time - Directory Assistance	X		X	
15	Answer Time - Repair Service	X		X	
16	Answer Time - Business Office	X		X	
17	Repair Service Appointments	X		X	
18	Service Order Appointments	X		X	
19	Central Office Data Base	X		X	
20	Equal Access and C.O.E.	X		(1)	

Any major difference noted between company's report and Staff's findings during the evaluation.....No

Note: (1) Indicates that the relevant item was not evaluated.
(2) No pertinent data was found.

Southern Bell
 July 12 thru September 2 , 1993

APPENDIX - A

Summary of Test Calls

<u>Type of Call</u>	<u>Number of Calls</u>
Dial Tone Delay	130275
Intra-Office	5593
Inter-Office	15292
EAS	11214
DDD-Intra-LATA	2182
DDD-Inter-LATA (IXC)	155705
Operator Answer Time	549
Directory Assistance	975
Repair Service	548
Business Office	633
Intercept	545
Pay Telephones Serviceability	453
Timed Billing	2227
Incorrectly Dialed	48
911 Service	625
Transmission (C.O)	32
Subscriber Loops	2196
IXC Transmission	18
Total Calls	329110

WEIGHTED INDEX—USING NEW ANSWER TIME RULE

EXHIBIT DBM-6

SOUTHERN BELL

REPORT DATE:OCTOBER 21, 1992

DATES STUDIED: MAY 11 THRU JULY 17, 1992

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
A. DIAL TONE DELAY					
DIAL TONE DEL +	95.0	99.9	1.1638	4.9	5.70
DIAL TONE DEL -	95.0		8.6887		
B. CALL COMPLETIONS					
INTRA-OFFICE +	95.0	99.9	0.0627	4.9	0.31
INTRA-OFFICE -	95.0		4.1058		
INTER-OFFICE +	95.0	99.2	0.0969	4.2	0.41
INTER-OFFICE -	95.0		2.1560		
EAS +	95.0	99.7	0.0287	4.7	0.13
EAS -	95.0		1.0182		
INTRA-LATA DDD +	95.0	98.2	0.1315	3.2	0.42
INTRA-LATA DDD -	95.0		1.1252		
C. INCORRECTLY DIALED CALLS					
INCORRECTLY DIALED +	95.0		0.1067		
INCORRECTLY DIALED -	95.0	93.3	0.1067	-1.7	-0.18
D. 911 SERVICE					
911 SERVICE -	100.0	99.7	2.9433	-0.3	-0.88
E. TRANSMISSION					
DIAL TONE LEVEL -	100.0	100.0	0.0002		
CENTRAL OFFICE LOSS -	100.0	100.0	0.0002		
M.W. FREQUENCY -	100.0	100.0	0.0002		
CEN. OFF. NOISE METAL -	100.0	100.0	0.0002		
CEN. OFF. NOISE IMPLSE -	100.0	100.0	0.0002		
SUBSCRIBER LOOPS +	98.0	98.5	0.2852	0.5	0.14
SUBSCRIBER LOOPS -	98.0		0.1426		
F. POWER AND GENERATORS					
POWER & GENERATORS -	100.0	100.0	0.0817		
G. TEST NUMBERS					
TEST NUMBERS -	100.0	100.0	0.0010		

EXHIBIT DBM-6

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
H. CENTRAL OFFICE					
SCHEDULED ROUTINE PROG +	95.0	100.0	0.0498	5	0.25
SCHEDULED ROUTINE PROG -	95.0		0.0498		
FRAME +	95.0	100.0	0.0561	5	0.28
FRAME -	95.0		0.0561		
FACILITIES +	95.0	100.0	0.0775	5	0.39
FACILITIES -	95.0		0.0775		
I. ANSWER TIME					
OPERATOR +	90.0	92.8	0.0531	2.8	0.15
OPERATOR -	90.0		0.3907		
DIRECTORY ASSISTANCE +	90.0	98.3	0.0531	8.3	0.44
DIRECTORY ASSISTANCE -	90.0		0.3907		
REPAIR SERVICE +	95.0		0.0531		
REPAIR SERVICE -	95.0	67.4	0.3907	-27.6	-10.78
BUSINESS OFFICE +	85.0		0.0618		
BUSINESS OFFICE -	85.0	71.4	0.4288	-13.6	-5.83
J. ADEQUACY OF DIR. AND DIR. ASSISTANCE					
DIRECTORY SERVICE -	100.0	100.0	0.0907		
NEW NUMBERS -	100.0	100.0	0.0409		
NUMBERS IN DIRECTORY +	99.0	100.0	0.2564	1	0.26
NUMBERS IN DIRECTORY -	99.0		0.5770		
K. ADEQUACY OF INTERCEPT SERVICES					
CHANGED NUMBERS +	90.0	100.0	0.1316	10	1.32
CHANGED NUMBERS -	90.0		0.3178		
DISCONNECTED SERVICE +	80.0	100.0	0.0500	20	1.00
DISCONNECTED SERVICE -	80.0		0.2200		
VACATION DISCONNECTS +	80.0		0.0329		
VACATION DISCONNECTS -	80.0		0.0599		
VACANT NUMBERS +	80.0	90.0	0.0283	10	0.28
VACANT NUMBERS -	80.0		0.2127		
DISCONNECTS NON-PAY -	100.0	100.0	0.1688		
L. TOLL TIMING AND BILLING ACCURACY					
INTRA-LATA BILL ACC. +	97.0	100.0	0.4388	3	1.32
INTRA-LATA BILL ACC. -	97.0		2.9217		
DIR. ASSIST. BILL ACC. +	97.0	98.0	0.4905	1	0.49
DIR. ASSIST. BILL ACC. -	97.0		0.0783		

EXHIBIT DBM-6

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
M. PUBLIC TELEPHONE SERVICE					
1 PAY PHONE/ EXCHANGE -	100.0	100.0	0.0007		
SERVICEABILITY -	100.0	98.4	0.0884	-1.6	-0.14
HANDICAPPED ACCESS -	100.0	78.4	0.0115	-21.6	-0.25
GLASS +	95.0	100.0	0.0057	5	0.03
GLASS -	95.0		0.0057		
DOORS +	95.0		0.0052		
DOORS -	95.0		0.0052		
LEVEL +	95.0	100.0	0.0078	5	0.04
LEVEL -	95.0		0.0063		
WIRING +	95.0	99.0	0.0061	4	0.02
WIRING -	95.0		0.0144		
CLEANLINESS +	95.0	99.7	0.0005	4.7	0.00
CLEANLINESS -	95.0		0.0370		
LIGHTS -	100.0	99.7	0.0229	-0.3	-0.01
TELEPHONE NUMBERS -	100.0	99.7	0.0535	-0.3	-0.02
NAME OR LOGO -	100.0	100.0	0.0008		
DIAL INSTRUCTIONS -	100.0	99.7	0.0884	-0.3	-0.03
TRANSMISSION +	95.0	99.7	0.0272	4.7	0.13
TRANSMISSION -	95.0		0.0272		
DIALING +	95.0	100.0	0.0008	5	0.00
DIALING -	95.0		0.0064		
COIN RETURN AUTO -	100.0	97.3	0.0038	-2.7	-0.01
COIN RETURN OPER +	95.0	96.6	0.0182	1.6	0.03
COIN RETURN OPER -	95.0		0.0182		
OPERATOR ID COINS +	95.0	99.0	0.0002	4	0.00
OPERATOR ID COINS -	95.0		0.0308		
ACCESS ALL LD CARRIERS -	100.0	100.0	0.0024		
RING BACK OPERATOR +	95.0	95.6	0.0002	0.6	0.00
RING BACK OPERATOR -	95.0		0.0308		
COIN FREE ACCESS OPER -	100.0	100.0	0.0099		
COIN FREE ACCESS D.A.-	100.0	100.0	0.0043		
COIN FREE ACCESS 911 -	100.0	100.0	0.0095		
COIN FREE ACCESS R.S.-	100.0	100.0	0.0035		
COIN FREE ACCESS B.O.-	100.0	100.0	0.0028		
DIRECTORY -	100.0	98.3	0.0014	-1.7	-0.00
DIRECTORY SECURITY +	95.0	97.7	0.0522	2.7	0.14
DIRECTORY SECURITY -	95.0		0.0522		
ADDRESS/LOCATION -	100.0	97.0	0.1280	-3	-0.38

EXHIBIT DBM-6

CRITERION	FPSC STANDARD	COMPANY RESULTS	WEIGHT FACTORS	DIFF	WEIGHT ADJUST
N. AVAILABILITY OF SERVICE					
3 DAY PRIMARY SERVICE +	90.0	100.0	0.0341	10	0.34
3 DAY PRIMARY SERVICE -	90.0		0.2461		
PRIM. SERV. APPOINTMNT +	95.0	100.0	0.1336	5	0.67
PRIM. SERV. APPOINTMNT -	95.0		0.8312		
M. REPAIR SERVICE					
RESTORED-SAME DAY +	80.0		0.0929		
RESTORED-SAME DAY -	80.0	68.4	0.1349	-11.6	-1.56
RESTORED-24 HOUR +	95.0	96.4	0.3770	1.4	0.53
RESTORED-24 HOUR -	95.0		1.3654		
REPAIR APPOINTMENTS +	95.0		0.1348		
REPAIR APPOINTMENTS -	95.0		0.1980		
REBATES OVER 24 HOURS -	100.0	65.2	0.0535	-34.8	-1.86
SERVICE AFFECTING-72 HRS +	95.0	95.8	0.1348	0.8	0.11
SERVICE AFFECTING-72HRS -	95.0		0.1980		
P. CUSTOMER COMPLAINTS					
COMPLAINTS/ 1000 LINES +	ST. AVE 0.19		0.3770		
COMPLAINTS/ 1000 LINES -	0.19	0.2	0.0000		EXC. AVG
BASE SCORE IF ALL STANDARDS ARE MET EXACTLY			75.00		75.00
SUM OF ADJUSTMENTS					-6.62
OVERALL WEIGHTED SCORE (BASE + SUM OF ADJUSTMENTS)					68.38

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of SOUTHERN BELL)	DOCKET NO. 910622-TP
for failure to meet PSC's Answer Time)	ORDER NO. 24746
Requirements.)	ISSUED: 7-2-91
<hr/>		

The following Commissioners participated in the disposition of this matter:

THOMAS M. BEARD, Chairman
 J. TERRY DEASON
 BETTY EASLEY
 GERALD L. GUNTER
 MICHAEL MCK. WILSON

NOTICE OF PROPOSED AGENCY ACTION

ORDER ACCEPTING OFFER OF SETTLEMENT
 AND CLOSING INVESTIGATION

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are adversely affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

At our May 7, 1991 Agenda Conference, we initiated two investigations into Southern Bell Telephone and Telegraph Company's (Southern Bell or the Company) compliance with Rules 25-4.110(2) and 25-4.073(1)(b), Florida Administrative Code. As a result, this docket was established to investigate the Company's compliance with Rule 25-4.073(1)(b), Florida Administrative Code.

The offer of settlement filed by Southern Bell states that the Company will remit \$40,000 to settle this investigation into its past compliance with Rule 25-4.073, Florida Administrative Code. In addition, the Company's offer requests that the Commission agree to grant its petition to initiate rulemaking, filed April 17, 1991, and now pending in Docket No. 910506-TL. Although the Office of Public Counsel (OPC) has filed a notice of intervention into this matter, the Company's offer does not reflect any agreement by OPC to settle this matter.

Based on the discussion at our May 7, 1991 Agenda Conference, it is apparent that there are several different interpretations of Rule 25-4.073(1)(b), Florida Administrative Code. The Company's offer reflects that it does not agree with our staff's

DOCUMENT NUMBER-DATE

ORDER NO. 24746
DOCKET NO. 910622-TP
PAGE 2

interpretation of Rule 25-4.073(1)(b), Florida Administrative Code. Settlement of this matter will permit our earlier consideration of the appropriateness of the Company's proposal to amend our answer time rule pending in Docket No. 910506-TL as well as any other amendment to that rule. It will also allow our staff to focus on the other current investigations regarding Southern Bell.

Based on our consideration of the above, we find Southern Bell's settlement offer to be reasonable, and we hereby accept it. By this acceptance, we also agree to grant the Company's petition to initiate rulemaking pending in Docket No. 910506-TL.

Based on the foregoing, it is, therefore

ORDERED by the Florida Public Service Commission that Southern Bell Telephone and Telegraph Company's offer to remit \$40,000 to settle this investigation is hereby accepted. It is further

ORDERED that our acceptance of the Company's settlement offer is proposed agency action and shall become final and effective if no protest is received within the period set forth in the Notice of Further Proceedings below.

By ORDER of the Florida Public Service Commission, this 2nd day of July, 1991.

STEVE TRIBBLE, Director
Division of Records and Reporting

(S E A L)

SFS

by: Kay Dixon
Chief, Bureau of Records

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that

ORDER NO. 24746
DOCKET NO. 910622-TP
PAGE 3

is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

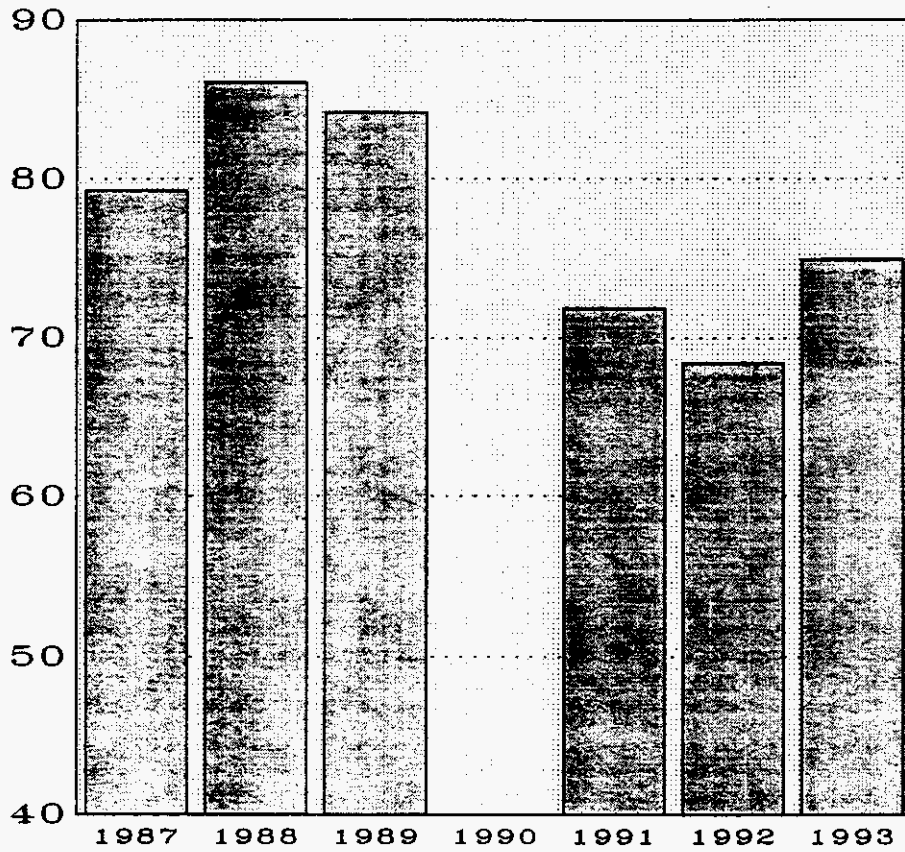
The action proposed herein is preliminary in nature and will not become effective or final, except as provided by Rule 25-22.029, Florida Administrative Code. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, as provided by Rule 25-22.029(4), Florida Administrative Code, in the form provided by Rule 25-22.036(7)(a) and (f), Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting at his office at 101 East Gaines Street, Tallahassee, Florida 32399-0870, by the close of business on
7-23-91

In the absence of such a petition, this order shall become effective on the day subsequent to the above date as provided by Rule 25-22.029(6), Florida Administrative Code.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

If this order becomes final and effective on the date described above, any party adversely affected may request judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or by the First District Court of Appeal in the case of a water or sewer utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days of the effective date of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

SOUTHERN BELL TELEPHONE WEIGHTED INDEX



NO STUDY IN 1990

 INDEX

**Southern Bell**

Marshall M. Criser, III
Operations Manager
Regulatory Relations

Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(904) 222-1201

December 18, 1992

Mr. Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Dear Mr. D'Haeseleer:

Attached is Southern Bell's response to your letter dated October 30, 1992 and Mr. Alan Taylor's letter dated November 18, 1992 concerning the Orlando and Gainesville service evaluation conducted during the May through July 1992 time period.

Should you have any questions concerning this matter, please contact me at (904) 222-1201 or Wayne Tubaugh, Manager-Network, at (904) 224-5128.

Sincerely,

Attachment

RECEIVED

DEC 18 1992

CMU

-1-

EVALUATION SUMMARY ITEM RESPONSES

C. Answer time-see response to Appendix "B" items.

F. Public Telephones-see response to Appendix "B" items.

H. Incorrectly dialed calls:

Pine Hills - The (2) reorders encountered during the service evaluation were due to a bad announcement trunk which was repaired immediately.

J. (2) 911 Service - Also addressed in Appendix "B" items. This finding seemed critical of the 911 agencies as opposed to our company. If you require additional information from us, please advise.

M. Repair Service-see response to Appendix "B" items.

Q. Periodic Reports-It is our understanding this referenced the Second Quarter Quality of Service Report filed on July 31, 1992. The Quarterly Report was filed in a timely matter, however, we advised the Commission that we had identified some problems with the underlying data in preparing schedule 11 and would file an amended report on August 30, 1992. It was determined it would be a manual effort to correct the data and resubmit the report. We advised the staff August 27, 1992 that we needed an extension of time as a result of Hurricane Andrew restoration efforts which required the work efforts of those individuals working on correcting the amended schedule 11 report. The amended report was filed on October 23, 1992. We regret any inconvenience.

APPENDIX "B" RESPONSES

(3) TDD Answer Time

Our TDD center has been reorganized and, at the time of the review, was not at the desired level of efficiency. We have made staff scheduling changes and additions which should result in Southern Bell meeting the required answer time.

(4) Answer Time

It is and has been Southern Bell's position that under the old Answering Time Rule, once the customer was answered by the Automated Answering System we were able and prepared to assist the customer. Therefore if a customer was answered within twenty seconds by the system we were in 100% compliance with the rule. There have been several agendas where this matter was discussed and most of the parties, including at least two Commissioners, determined the rule could be interpreted several ways. The staff and parties were directed to conduct "work shops" to develop a rule that would be in the public interest and fair to the industry. The staff conducted the work shops and proposed a rule that better served both the customer and the industry. This rule became effective on November 24, 1992.

The new rule requires a company, when deploying a menu driven automated system, to answer 95% of the calls within 15 seconds. Should the customer not interact with the system, the rule further requires the company to answer 95% of the calls with an attendant within 55 seconds from the last digit dialed for repair, operator services, and directory assistance and 85% of the calls for the business office. If the customer begins to interact with the system but then stops the system has ten seconds to recognize that the customer is no longer interacting with it. Contrary to the staff's interpretation, the rule does not require an attendant to answer such a call within 10 seconds. Rather, the call must be answered within 55 seconds of the customer's having dialed the last digit. In all of the test calls conducted by Southern Bell, except for those months where Hurricane Andrew caused the answer time to substantially exceed the rule requirement, we have determined that we met the new rule requirement.

Southern Bell can not comment on the staff's "extrapolations" that determined we were unsatisfactory under the new rule as we are unsure of the criteria or methodology used to develop this information. As noted above, we are and have been, in compliance with the Answering Time Rule.

(5) It is our understanding that the (305) safety variances noted

in Appendix B.5 are being handled externally to this service evaluation and that the (16) variances associated with the service evaluation were satisfactorily answered during or shortly after the evaluation. Please advise if your records reflect otherwise.

(6) LEC Payphones

With regard to the pay telephones that were out-of-service, missing directories, or which were without complete address information, we believe the service evaluation shows that Southern Bell is doing an excellent job of providing service. Pay telephones are constantly abused, yet in substantially all instances we were in compliance with the rules.

For instance, of the (304) pay phones reviewed by staff, only five were found out-of service. Of the (302) pay phones reviewed by the staff for current directories only five were missing directories. Of the (301) pay phones reviewed by the staff for address/location all had address/location information, however, the staff identified only nine that purportedly needed additional information. We will redouble our efforts in this area. However, it is simply unreasonable to expect a higher level of compliance.

All handicap variances were corrected immediately. Southern Bell has an ongoing program of bringing all public telephones into compliance with handicap regulations, including even those that are grandfathered. We are correcting all the grandfathered locations and are significantly ahead of the industry in bringing our company in compliance with this rule.

The Lake City Operator coin return trouble was isolated to a Subscriber Loop Carrier (SLC) problem and has been corrected.

We replace all missing directories as soon as we become aware of the lack of a directory in a location required to have one. The loss of these directories, as well as damage to booth lighting, are generally a case of vandalism.

All phones (100%) had address location information, however, the staff identified (9) with "inadequate" information. These have been augmented with additional location information.

(7) Rebates

In the Orlando review the staff requested rebate records on (99) out-of-service reports. 100% of the rebates were properly provided to the customers. In Gainesville, the staff requested rebate records on (20) out-of-service reports. 100% of the customers eligible for a rebate were provided a rebate. Eight customers were identified as not being eligible for a rebate. Four trouble reports were not tested out-of-service and discussions with the customer after the initial report

supported that determination. Four trouble reports were a result of CPE wire or equipment. We are not required by the Commission's rules to rebate CPE caused troubles.

The rule requires the company to attempt to notify the customer when it has been identified that their equipment is causing trouble on the network. In the initial contact with the customer reporting the trouble we request a "can be reached" number. It is Southern Bell's policy and practice that when it is determined the trouble is caused by the customer's equipment the company attempts to reach the customer at the listed telephone number, the "can be reached" number, or leaves a door hanger card at the premises. This is done in all cases. It is our policy to keep the customer informed and every attempt to reach the customer is made.

(8) Same Day Restoral

Commission Rules do not require 80% of the out-of-service (oos) troubles be restored the same day. The objective is a recommendation by the staff and is currently being reviewed in a work shop concerning the Commission's Rules. Based on two studies we have conducted concerning this concept, we have determined approximately 62% of our oos trouble reports are received by 3:00 p.m. each day, with the majority of the remaining 38% reported after 5:00 p.m. The staff objective would therefore be impossible to meet despite all efforts by the company.

(9) Customer Complaints

While your report indicates the reduction in complaints in 1992 over year 1991, it fails to indicate the degree of improvement. As of year to date July 1992, Southern Bell had shown a significant decline of 28%. That 28% reduction has held through September 1992.

Your report also compares Southern Bell complaints per 1000 customers against the industry average, and in particular against the other two major local exchange companies. A more appropriate measure would be the justified appeals, as determined by the FPSC staff. Southern Bell not only realized a marked improvement over past years, but ranked better than the other LEC whose customer base most resembles ours.

(11) Adequacy of Intercept

The announcement "being checked for trouble" is a default announcement that is used until the service order is completed and the "temporarily disconnected" announcement is translated in the switch.

State of Florida

Commissioners:
 J. TERRY DEASON, CHAIRMAN
 THOMAS M. BEARD
 SUSAN F. CLARK
 LUIS J. LAUREDO
 JULIA L. JOHNSON



DIVISION OF COMMUNICATIONS
 WALTER D'HAESELEER
 DIRECTOR
 (904) 488-1280

Public Service Commission

February 5, 1993

Mr. Marshall M. Criser, III
 Operations Manager - Regulatory Relations
 Southern Bell Telephone & Telegraph Company
 150 S. Monroe Street, Suite 400
 Tallahassee, Florida 32301-1556

Dear Mr. Criser:

We have reviewed your response, dated December 18, 1992, to the service evaluation we performed in the Orlando and Gainesville areas. We are not in agreement with several of your conclusions as it relates to your Appendix "B" responses.

Concerning answer time (item 4), we are not in agreement with your position that Southern Bell only has to have its automated answering system answer within the specified time in order to meet answer time under the old rule. It is our understanding that less than 25% of incoming calls are satisfied through the automated system, therefore, we measure "operator answer time" not automated answer time. In regards to the new answer time rule that recently went into effect, we also disagree with your conclusion that the operator has fifty-five seconds to answer after a customer stops interacting with the system for ten seconds.

With regard to the comments relative to adjusting our test results to recognize the new rule, our "extrapolations" were done, according to the new answer time rule, by adding ten seconds network setup time to the timings that were made. Under this method Southern Bell did not meet the answer time rule.

In your comments on rebates, you mentioned that staff requested rebate records on (99) out-of-service reports in Orlando and 20 in Gainesville, this is incorrect. What we requested were the records on any troubles that went over twenty-four hours so that we could determine whether they were out of service and entitled to a rebate. Since the company provided records only for outages which were rebated, we excluded them and only used those cases of trouble we evaluated during our study to determine if a rebate was required. Of the 23 due rebates, 15 were given, leaving 8 cases that required rebates that were not given. Four of these involved customer premise equipment in which you failed to notify the customer within the twenty-four hours. We believe these required a rebate according to the rules. The other four were classified by the customers as out of service and Southern Bell downgraded them because they tested okay (which is a rule violation). We had no evidence that the customers reported these in error as out of service.

Mr. Marshall M. Criser, III
February 5, 1993
Page two

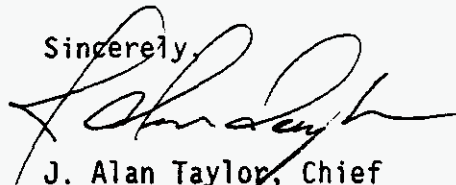
Regarding your comments on same day restoral, you stated that Southern Bell receives approximately 62% of the trouble reports by 3:00 p.m. each day with the remaining 38% reported after 5:00 p.m. and that because of this you can't possibly make the 80% restored the same day. Since we use a 3:00 p.m. cutoff, the number of tickets you get after 3:00 p.m. does not affect your ability to fix 80% of those you receive by 3:00 p.m. We don't feel this is an unmakeable objective.

On adequacy of intercept, we don't believe that you should use a default announcement on a temporarily disconnected number that says it is "being checked for trouble". You should use the announcement for disconnected numbers as the default.

We agree that Southern Bell has made substantial improvements in lowering the customer complaints per 1000 lines. Staff looks at both the total and justified complaints in the evaluation process. However, we put more emphasis on total complaints since that is a barometer of customer dissatisfaction.

We have no problem with the remainder of your response to our evaluation. Staff anticipates that you will take the necessary action to correct the deficiencies mentioned above.

Sincerely,



J. Alan Taylor, Chief
Bureau of Service Evaluation

cc: Walter D'Haeseleer
Richard Tudor
Don McDonald
Elton Howell
Office of Public Counsel