

Robert G. Beatty
General Counsel-Florida

Southern Bell Telephone
and Telegraph Company
c/o Regulatory Department
Suite 400
150 S. Monroe Street
Tallahassee, Florida 32301
Phone (305) 347-5555

July 7, 1995

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

950778-TL

Re: Docket No.
Petition of Southern Bell to initiate
investigation of potential changes to
Rules 25-4.066 through 25-4.080, F.A.C.

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Petition, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Robert G. Beatty
Robert G. Beatty

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. Douglas Lackey

DOCUMENT NUMBER-DATE

06433 JUL-7 1995

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Southern Bell)
Telephone and Telegraph Company) Docket No.
to initiate investigation of)
potential changes to Rules)
25-4.066 through 25-4.080, F.A.C.)
_____) Filed: July 7, 1995

**PETITION OF SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY TO INITIATE INVESTIGATION OF POTENTIAL
CHANGES TO RULES 25-4.066 THROUGH 25-4.080, F.A.C.**

BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a Southern Bell Telephone and Telegraph Company, ("Southern Bell" or "Company") hereby petitions the Commission, pursuant to Rule 25-22.012, Florida Administrative Code, to investigate and implement changes in the above-referenced rules, which relate to quality of service standards, and state the following:

1. Southern Bell's principle place of business in Florida is:

Southern Bell Telephone and Telegraph Company
150 West Flagler Street, Suite 1910
Miami, Florida 33130

2. All notices, pleadings, orders and other materials in this docket should be directed to the following on behalf of Southern Bell.

Robert G. Beatty
J. Phillip Carver
c/o Nancy H. Sims
150 South Monroe St., Ste. 400
Tallahassee, Florida 32301

3. Southern Bell is a telecommunications company lawfully doing business in the state of Florida, whose regulated operations are subject to the jurisdiction of the Florida Public Service Commission ("Commission") pursuant to Chapter 364, Florida Statutes.

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4. On January 5, 1994, Southern Bell and the Office of Public Counsel ("OPC") entered into a Stipulation and Agreement for the settlement of all matters encompassed within Docket Nos. 920260-TL, 900960-TL, 910163-TL and 910727-TL (collectively "Southern Bell rate case"). This settlement was subsequently approved by the Florida Public Service Commission in Order No. PSC-94-0172-FOF-TL, issued February 11, 1994 (Order Approving Stipulation and Implementation Agreement).

5. In pertinent part, the Stipulation and Agreement provides as follows:

19. THE PARTIES agree that they shall jointly petition the FPSC to conduct workshops on any issue or issues related to the FPSC's quality of service rules that either party believes need to be clarified or addressed.

6. The quality of service rules (contained in Part 5 - "General Service Provisions", Rules 25-4.066 through 25-4.080, F.A.C.) set forth the criteria for measuring the quality of service to subscribers. Certain of these rules have existed in excess of twenty years. The telecommunications industry, technology and the manner in which service is rendered have all changed substantially since the time that many of these rules were originally written. Moreover, the recent changes to Chapter 364 will obviously prompt additional, substantial changes in the way that service is provided to customers not only by existing local exchange companies, but also by new entrants in the local exchange market.

7. Southern Bell believes that in the current environment, the interests of the ratepayers of Florida would be better served

by service rules that focus more directly upon what Florida customers want regarding their service needs and desires. Specifically, the appropriate standard for customer satisfaction should be the customers' opinions and views on whether they are receiving a satisfactory quality of service.

8. Accordingly, Southern Bell hereby petitions the Commission to open a docket for the purpose of conducting workshops and other appropriate inquiries to determine whether quality of service measurements that would focus more specifically on customer satisfaction are appropriate, and if so, how these rules should be drafted and ultimately implemented. Southern Bell has previously informed OPC of its plans to file this petition, and OPC stated that it has no objection to Southern Bell's filing the petition unilaterally.

WHEREFORE, Southern Bell respectfully requests that the Commission open a docket for the purpose of conducting workshops and undertaking such other investigations as may be necessary to determine whether the quality of service rules should be changed, and if so, in what way.

Respectfully submitted this 7th day of July, 1995.

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Robert G. Beatty

ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy H. Sims
150 South Monroe St., Ste. 400
Tallahassee, FL 32301

CERTIFICATE OF SERVICE
DOCKET NO.

I HEREBY CERTIFY that a true and correct copy of the
foregoing was served by U.S. Mail this 7th day of July, 1995
to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Tallahassee, FL 32399-0850

Robert G. Beatty
Robert G. Beatty ₀₂