

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.)
Customer Relations; Rules Incorporated,)
and Proposed Amendments to Rules 25-4.)
003, F.A.C., Definitions; 25-4.110, F.A.C.,)
Customer Billing; 25-4.118, F.A.C.,)
Interexchange Carrier Selection; 25-24.490,)
F.A.C., Customer Relations; Rules Incorporated)

Docket No. [REDACTED]
Filed January 23, 1998

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S
NOTICE OF SUPPORT FOR LOWER COST REGULATORY ALTERNATIVE
AND
SUBMISSION OF LOWER COST REGULATORY ALTERNATIVE**

Sprint Communications Company Limited Partnership ("Sprint") hereby files its Notice of Support of the Florida Competitive Carriers Associations' lower cost alternative number one (1). Moreover, Sprint submits its proposal for a lower cost regulatory alternative pursuant to Section 120.541(1)(A), Florida Statutes. (See Attachment A.)

1. On December 24, 1997, the Commission issued Order No. PSC-97-1615-NOR-TI, wherein it proposed additional rules and rule amendments.

2. Sprint will be substantially affected by the rules the Commission proposes to adopt at this time. Sprint will be required to adjust its operating and billing systems and in doing so will incur additional costs.

3. On January 15, 1998, the Florida Competitive Carriers Association submitted two lower cost alternatives to the Commission's rules referenced herein. The FCCA's first regulatory alternative proposes that the Commission adopt the Federal Communication Commission's (FCC) soon-to-be adopted slamming rules.

- ACK _____
- AFA _____
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- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

4. **Sprint concurs in and fully supports the FCCA's lower cost alternative number one (1).**


5. **Should the Commission reject the FCCA's lower cost alternative number one (1), Sprint submits its good faith lower cost alternative. Specifically, Sprint submits a lower cost alternative to the Commission's proposed Rule 25-4.118(14), Florida Administrative Code. Sprint believes this alternative will effectuate the Commission's purpose at a lower cost.**

6. **Sprint's lower cost alternative makes an additional option available to telecommunications carriers. This option will reduce the cost of implementation and at the same time improve service to those consumers who assert that they have been slammed. Sprint's alternative modifies the proposed amendment to Rule 25-24.118, Florida Administrative Code, to include a toll-free slamming information number.**

WHEREFORE, Sprint Communications Company Limited Partnership requests that the Commission adopt the FCCA's lower cost alternative number one (1), or in the alternative adopt Sprint's lower cost alternative submitted herein.

Respectfully submitted this 23rd day of January, 1998.

Sprint Communications Company, L.P.



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**Attorney for Sprint Communications
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**SPRINT COMMUNICATION COMPANY LIMITED PARTNERSHIP'S
LOWER COST ALTERNATIVE**

Sprint proposes that Rule 25-24.118(14), Florida Administrative Code, be modified as follows:

Each company shall provide a live operator to answer incoming calls 24 hours a day, 7 days a week, or shall record end-user complaints. A combination of live operators and recorders may be used. If a recorder is used, the company shall attempt to contact each complainant no later than the next business day following the date of recording. A minimum of 95 percent of all call attempts shall be completed to a company's toll-free customer service number or to the company's toll-free slamming information number. Station basics will not be counted as completed calls. The term "answer" as used in this subsection means more than an acknowledgment that the customer is waiting on the line. It shall mean the provider is ready to render assistance or accept the information necessary to process the call.

Sprint's proposed modification would allow companies to establish a separate toll-free slamming number. Establishing a toll-free number exclusively for slamming complaints would enhance customer service to those consumers who assert that they have been slammed. Companies could ensure that customer service representatives who are assigned to the slamming number are trained to handle those types of inquiries. Further, companies would also be in a better position to gauge staffing levels.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Submission of Lower Cost Regulatory Alternatives, on behalf of Sprint Communications Company Limited Partnership, was served via United States mail, first class postage paid and properly addressed to the following:

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This 23rd day of January, 1998



Monica Barone