



ORIGINAL

Beverly Y. Menard
Regulatory & Governmental Affairs
Assistant Vice President - Florida/Georgia

GTE Service Corporation

One Tampa City Center
Post Office Box 110, FLTC0616
Tampa, Florida 33601-0110
813-483-2526
813-223-4888 (Facsimile)

January 6, 2000

Ms. Blanca Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Dear Mr. D'Haeseleer:

**Subject: GTE Communications Corporations's Post Workshop Comments
Proposed Customer Complaint Rule Changes
Docket No. 991651, Rule 25-22.032**

Enclosed is GTE Communications Corporation's (GTECC) post workshop comments in the above reference rule docket.

If you have any questions or require additional information, please contact Debby Kampert of my staff at 813-483-2531.

Sincerely,

Milu Seohui

AFA	<input checked="" type="checkbox"/>	Beverly Y. Menard
APP	<input checked="" type="checkbox"/>	<i>Brown</i>
CAF	<input checked="" type="checkbox"/>	
CMU	<input checked="" type="checkbox"/>	BYM:DBK:wjh
CTR	<input checked="" type="checkbox"/>	Enclosure
EAG	<input type="checkbox"/>	
LEG	<input type="checkbox"/>	
MAS	<input type="checkbox"/>	
OPC	<input type="checkbox"/>	
RRR	<input type="checkbox"/>	
SEC	<input checked="" type="checkbox"/>	
WAW	<input type="checkbox"/>	
OTH	<input type="checkbox"/>	

MAIL ROOM
00 JAN -7 PM 12: 18
RECEIVED
FLORIDA PUBLIC SERVICE COMMISSION
DOCUMENT NUMBER-DATE
00310 JAN-78

**GTE COMMUNICATIONS CORPORATIONS COMMENTS
PROPOSED CUSTOMER COMPLAINT RULE CHANGES
DOCKET NO. 991651-PU, RULE 25-22.032**

Following are the comments of GTE Communications Corporation (GTECC) with regard to specific sections of the proposed customer complaint rules.

25-22.032 (2) Transfer-connect Requirement

GTECC has an 800 number for Commission's Staff to use to directly transfer customers to GTECC's customer relations department. The customer relations department's office coverage schedule includes the Commission's normal business hours. The 800 line also has voice mail capabilities, so that customers can leave messages outside of business hours. The customer relations department responds promptly to such messages.

25-22.032 (3) Complaints resolved within three days

The proposed complaint resolution within 3 days is too stringent. GTECC believes that 5 working days is more appropriate for ALEC and long distance complaints. In many cases, response to such complaints may require coordination among various companies. For instance, information may need to be obtained from the underlying facilities provider in the case of a reseller of local or long distance service. This information might include items like copies of third party verification (TPV) tapes, billing records and provisioning data. It would be very difficult to retrieve and examine this kind of data—and respond to the customer—within just 3 days. Five days is still ambitious, but more reasonable.

GTECC believes the majority of the complaints would be resolved within this time frame. The more practical 5-day period would thus reduce the need for Staff follow-up by the staff and minimize the number disputed complaints that may require additional Staff involvement.

25-22.032 (6)... The proposed resolution may be either oral or written.

The proposed Staff resolution should always be written. Reducing the proposed resolution to writing avoids any misunderstandings by either the Company or the customers and provides documentation which may be necessary if the complaint is subject to future proceedings.

**GTECC COMMUNICATIONS CORPORATIONS POST WORKSHOP COMMENTS
DOCKET NO. 991651-PU, RULES 25-22-.032**

25-22.032 (7) (a) ... within 30 days after the proposed resolution is sent to the customer.

The wording should be changed to reflect that the proposed resolution should be sent to all parties. The receipt of the proposed resolution should start the 30-day clock. The rule should state" ... within 30 days after the proposed resolution is received by the participants. The Staff could assume a standard 5-day mailing interval to determine the start of the 30-day time period.

25-22-.032 (7)(b)3. Statement of relief requested,

The proposed rule states that the Staff will notify the customer that the request for an informal conference.... The proposed rule should be changed to state the Staff will notify the participants that the request for an informal conference must be received within 15 days. ,

25-22.032 (9) Record retention and auditing

The proposed rule in section 9(a) requires that companies retain any telephone notes or written documentation relating to complaints for three years, beginning when the complaint was first received. GTECC recommends reducing the proposed three-year record retention period to two years for resolved complaints, beginning when the complaint was first received. This retention period would be more consistent with other retention rules. For instance, for slamming complaints, the carrier will often rely upon a third party verification (TPV) tape to substantiate a provider change. The FCC rules require retention of TPV tapes for two years. Furthermore, the Florida rules require retention of letters of authorization, another key type of document in slamming cases, for two years. It would be incongruous for the Commission to require retention of complaint materials for three years, when much of the related data need only be kept for two years.



Beverly Y. Menard
Regulatory & Governmental Affairs
Assistant Vice President - Florida/Georgia

GTE Service Corporation

One Tampa City Center
Post Office Box 110, FLTC0616
Tampa, Florida 33601-0110
813-483-2526
813-223-4888 (Facsimile)

January 6, 2000

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Dear Mr. D'Haeseleer:

**Subject: GTE Florida's Post Workshop Comments
Proposed Customer Complaint Rule Changes
Docket No. 991651, Rule 25-22.032**

Enclosed is GTE Florida's (GTEFL) post workshop comments in the above reference rule docket.

If you have any questions or require additional information, please contact Debby Kampert of my staff at 813-483-2531.

Sincerely,

BW Beverly Y. Menard

BYM:DBK:wjh
Enclosure

**GTE FLORIDA'S POST WORKSHOP COMMENTS
PROPOSED CUSTOMER COMPLAINT RULE CHANGES
DOCKET NO. 991651-PU, RULE 25-22.032**

Overall, GTE Florida (GTEFL) supports the Commission's intent that disputes be resolved as quickly, effectively, and inexpensively as possible.

25.22.032 (2) Transfer- Connect Requirement

GTEFL already has the warm transfer in place and currently takes calls between 8:30 and 4:30. Given the current tours we have for the hourly staff that handle these calls, GTE Florida could open those lines up at 8:00 a.m. All tours, however, end at 4:30. In order to accommodate calls until 5:00, GTE Florida would have to bid a new job tour and schedule employee supervision, as well, solely to answer warm transfer calls. This would be a major intrusion into GTE's business practices in exchange for what GTE believes would be only very minimal benefits.

In addition, the proposed rule does not take into account that the company may observe a different holiday schedule than the Commission. Again, GTE believes it is not reasonable for the Commission to ask for staffing on a company-observed holiday.

Given the potential differences in hours and holidays, GTEFL recommends the process be that when voicemail is not available and the Commission staff cannot reach the company, a customer Inquiry would be taken and offered as one of the 3 day opportunities.

25.22.032 (3) Complaints resolved within three (3) days

GTE appreciates and supports the concept of a finite complaint resolution period and believes it would reduce the Company's administrative time and cost of providing a formal response. However, GTE would suggest extending the proposed 3-day period to perhaps 4 or 5 days. This slightly longer period is more realistic in that complaints often require research and/or retrieval of billing and other historical records. "Emergency" complaints could be handled on a more expedited basis.

25.22.032 (7) Informal Conference

GTE Florida supports the changes relative to informal conference and believes these changes are necessary.

GTE FLORIDA'S POST WORKSHOP COMMENTS
DOCKET NO. 991651-PU, RULE 25-22.032

25.22.032 (9)(b) Record retention and auditing

In regards to filing reports, GTE suggests that in order to provide the resolution on the requested reports for the transfer connect and three day complaint, the report would have to reflect data closed during the month rather than received during the month. If a report is pulled for customer issues received; there is a chance that some would not have been resolved yet due to the time between receipt and closure.

Additional Comments

GTE appreciates the effort being made by the Commission in regards to this rule. In order to work out the logistics of actual implementation, tracking and monitoring of each type of customer contact, i.e. warm transfer, 3 day resolution and complaint, GTE recommends formation of an industry task force.

GTE does have some questions regarding administration of complaints under the proposed procedure—for instance, if a 3 day complaint becomes a formal complaint is it then given a different kind of case number (or then assigned the initial case number)? And how quickly would the companies know that a 3 day complaint is resolved or closed by the Consumer Affairs staff? GTE believes these and other issues can be resolved via the task force.