

January 7, 2000

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VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
The Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

ORIGINAL

Re: Docket No. 991651 - Revision of Rule 25-22.032, F.A.C., Customer Complaints

Dear Ms. Bayó,

Enclosed for filing the above-referenced docket are the original and 15 copies of the preliminary comments of MCI WorldCom, Inc. Also enclosed is a copy of the comments on diskette.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance in this matter.

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

Enclosures

cc: Martha Carter Brown, staff counsel

- MPA
- APP *Brown*
- CAF *1*
- CMU
- CTR
- EAG *2/4-VI*
- LEG
- MAS
- OPC
- RRR
- SEC *1*
- WAW
- OTH

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Revision of Rule 25-22.032, F.A.C.,)
Customer Complaints)
_____)

Docket No. 991651
Filed: January 7, 2000

**PRELIMINARY COMMENTS OF MCI WORLDCOM, INC.,
AND ITS OPERATING SUBSIDIARIES**

MCI WorldCom, Inc., and its operating subsidiaries, (MCI WorldCom) files its preliminary comments on the proposed rules.

Introduction

On November 19, 1999, the Commission staff held a workshop to discuss the proposed revisions of Rule 25-22.032, Florida Administrative Code. There were numerous representatives from all industries participating in the workshop. MCI WorldCom's preliminary comments regarding the proposed rules are discussed below.

Comments on Specific Proposed Rules

Rule 25-22.032(2) - Transfer Connect

This section of the proposed rule would require specific companies, such as MCI WorldCom, to provide a transfer connect telephone number by which the Commission may directly transfer a customer to that company's customer service representative. Currently, MCI WorldCom is participating in the Commission's Transfer Connect program.

For MCI WorldCom to be involved in the Transfer Connect program, it incurs costs with AT&T, U.S. West, and an equipment vendor. Because AT&T is not able to program an MCI WorldCom toll free number into the Transfer Connect program, MCI WorldCom has had to acquire services from U.S. West and equipment from a vendor.

DOCUMENT NUMBER-DATE

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The nonrecurring cost for MCI WorldCom's participation is approximately \$7,500, and the monthly recurring cost is approximately \$1,550 in addition to the cost per minute for each call.

Although MCI WorldCom has agreed to participate, it objects to being required to pay its competitor to carry this service when MCI WorldCom could offer a reasonable alternative over its own network. At the very least, the Commission should require the company providing the transfer connect service to the Commission, at this time AT&T, to load any competitor's 800 number into the transfer connect system.

Rule 25-22.032(3) - Complaints resolved within 3 days

With its proposed revisions to the customer service rule, staff has essentially proposed three procedures for companies to handle calls and complaints: 1) requirement for certain companies to handle calls through the transfer connect program; 2) procedure for resolving complaints within three days; and 3) procedure for resolving complaints within fifteen days.

With respect to the portion of the rule that contemplates resolution within three days, MCI WorldCom recommends that the appropriate resolution time in the rule should be 5 business days rather than 3 days. Although MCI WorldCom strives to resolve each complaint on the first call, some complaints require further research and investigation. The additional time would provide companies the time necessary to investigate and resolve more complaints than the three-day process.

Moreover, in subsection (a) of proposed rule 25-22.032(3), MCI WorldCom recommends clarification of what it means for staff to send a complaint to the company.

During the workshop various companies indicated that they have certain sending requirements, such as sending electronically or by fax. To expeditiously research, investigate and track the complaint sent by staff, MCI WorldCom requests that it receive such complaints from staff electronically.

Rule 25-22.032(9) - Record retention and auditing

The proposed rule requires companies to retain records for three years. Rather than requiring three years as proposed, MCI WorldCom recommends that the Commission follow the FCC's two-year requirement for record retention since many companies regulated by this Commission provide service nationwide.

Conclusion

MCI WorldCom has provided its preliminary comments and recommendations for clarifying portions of the proposed revisions to the customer service rule. The workshop scheduled for January 27, 2000, will provide a forum for further discussion, and perhaps the staff and parties can reach consensus on the proposed rule revisions at that time.



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