

ORIGINAL

Legal Department

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RECORDS AND
REPORTING

January 7, 2000

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

991651-

Re: Revision of Rule 25-22.032, F.A.C., Customer Complaints

Dear Ms. Bayo:

In connection with the procedure set forth during the workshop held on November 19, 1999 regarding proposed revisions to Rule 25-22.032, Florida Administrative Code, BellSouth submits the following comments:

1. Rule 25-22.032(2)(2) - BellSouth requests that the phrase "customer service representative" be changed to "customer service personnel." BellSouth requests this change due to the fact that the term "customer service representative" denotes a specific type of employee within BellSouth. BellSouth also notes that the holidays enjoyed by the Commission may not necessarily coincide with those given in BellSouth, and therefore, an exception process may need to be put in place for these occurrences.
2. Rule 25-.22.032(3) - BellSouth requests that the proposed three days in which complaints may be resolved be expanded to five days. BellSouth requests this change in order to accommodate those appeals which are complex in nature.
3. Rule 25-22.032(3)(b) - BellSouth requests that the customer should be given a specific amount of time to respond to the Commission in as much as the fifteen-day requirement contained in Section 4(a) will be running.

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4. Rule 25-22.032(3)(c) - BellSouth requests that the Commission notify the Company as soon as possible that the complaint has not been resolved inasmuch as the fifteen-day requirement contained in Section 4(a) will be running.
5. Rule 25-22.032(7)(e) - BellSouth requests that all parties be required to agree to the method by which the informal conference is to be held, that no more than two continuances should be granted, and that at least 48 hours prior notice be given of any continuance. Moreover, BellSouth requests that all parties must abide by the method by which the informal conference is to be held, i.e., all in person, all by telephone, etc. BellSouth believes these changes will expedite the handling of the inference.
6. Rule 25-22.032(9)(b)(1) - BellSouth requests that the requirement that the Company include the resolution of the complaint in the yearly report be deleted as unduly burdensome. BellSouth agrees that the name and telephone number of calls handled via transfer connect should be reported.

BellSouth believes that the process set forth in the proposed rule is fair and reasonable. BellSouth also believes that there are implementation items that must be discussed and looks forward to the next workshop.

Sincerely,

Nancy B. White (KR)
Nancy B. White

cc: Martha Carter Brown