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

RE: Docket 991651, Revision of Rule 25-22.032, F.A.C., Customer Complaints

Dear Ms. Bayo:

This is in response to the Division of Consumer Affairs' request for written comments pertaining to the above docket number. Sprint supports the Commission's initiative to streamline this process in an effort to improve the method in which complaints/inquiries are distributed and the resolutions submitted to the Commission. Sprint's comments are as follows:

(2) Transfer-connect Requirement:

Participation in this process should be on a voluntary basis. Some companies currently participate in this process on a voluntary basis, but they are not required to provide customer service representatives to handle transferred calls during the Commission's normal business hours; Monday through Friday, 8:00 A.M. to 5:00 P.M., Eastern time. The companies with answering points in Florida, or the Eastern time zone, generally staff to handle transfer calls between 8:00 A.M. and 5:00 P.M., Monday through Friday except for Company observed holidays, which may differ from those observed by the FPSC. It would be an added cost to the respective companies to schedule employees to staff the call transfer line during other than normal business hours Monday through Friday and on holidays observed by the respective Company.

Additionally, given the time zone differences of various other call transfer answering points, it seems a reasonable compromise would be to establish an arrangement whereby the respective companies could, on a voluntary basis, participate in the process during their normal working hours. The FPSC could then manage the transfer of calls to these companies during the respective company's normal business hours. A simple matrix developed by the FPSC would easily accommodate this arrangement.

Some companies will also encounter technical problems with accommodating a direct transfer to a "service representative" due to the limitations inherent with the communications system serving their business. It may be necessary for a call to be answered at a central answering point and then connected to a qualified service

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representative. Further, some companies may not wish to obtain service from a competitor such as AT&T.

The need for monthly and/or annual activity reports could be satisfied by the respective company responding to the FPSC with a brief e-mail. The e-mail over the internet could include the complainant's/customer's name, telephone number, complaint category (using the FPSC's list of categories) and a very short statement concerning the resolution (toll credit issued, toll rate adjusted, service installed, service repaired, etc.). The FPSC would then have the appropriate information on hand to prepare a monthly, quarterly or annual report. This process would be in lieu of the respective companies setting up a tracking mechanism and then summarizing it on a monthly, semi-annual or annual basis for submission to the FPSC.

The incentive for companies to voluntarily participate is that these type calls will not show up as a complaint relevant to a comparative performance measure with other industry companies.

(3) Complaints Resolved in 3-Days:

The intent of this voluntary participation process is to promote the speedy resolution of customer complaints, improve process efficiency and reduce the administrative cost associated with a more formal process. In order to promote maximum participation and the implementation of a process that will be both successful and long lasting, utilization of a 5 business day turn around objective is recommended. The speed of the proposed process could begin right away with the FPSC summarizing a verbal complaint and sending it to the company via internet e-mail, or in the case of written customer correspondence, faxing a copy to the company. Further, a requirement for customer contact to be attempted and hopefully made within 24 hours of receipt of the complaint by the respective company could be established. This will begin the resolution process and serve to assure the customer progress is being made toward a prompt resolution. Cost reduction and efficiency could then be realized by the respective company submitting a brief electronic report (internet e-mail) to the FPSC. The report would include the customer's name, address and telephone number along with a brief statement addressing the resolution, the amount of any credits and a comment addressing the level of customer satisfaction achieved.

The incentive for companies to voluntarily participate is that complaints successfully processed in this manner will not show up in published monthly reports relevant to a comparative performance measure with other industry companies. An additional incentive is the increased efficiency and lower cost associated with processing a customer complaint.

Complaints processed in this manner that are not resolved to the customer's satisfaction or a written resolution response is not received by the FPSC within the specified time frame would be forwarded back to the respective company as a formal complaint. The time frame for response by the respective company should be no less than 10 business days from date of receipt of the now formal complaint from the FPSC.

In the interest of uniformity, it is recommended that the definition of "resolution" be included in the new rule. For the customer complaint process, the following one from the dictionary seems appropriate : "A course of action determined or decided upon." It would also be helpful to have a clear understanding of the meaning of the word "satisfaction" as referenced in the rule. It is important to recognize that a customer may not be satisfied with a resolution simply because what was desired or preferred was not provided yet the resolution was in complete accord with the existing rules, regulations, tariff or rates on file with the FPSC.

Sincerely,


Harvey L. Sperars, Jr.