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AT&T

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RECORDS AND
REPORTING

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January 14, 2000

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

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

Dear Ms. Bayo:

Attached are AT&T's comments on the proposed customer complaints rule in the above docket. An electronic version of these comments is being forwarded to Ms. Martha Carter Brown via E-mail.

Thanks you for the opportunity to provide input. Please feel free to call me if you have questions.

Sincerely,

Marsha Rule

Attachments
MER/kfj

AFA	1
APP	<u>Brown</u>
CAF	_____
CMU	_____
CTR	_____
EAG	_____
LEG	_____
MAS	_____
OPC	_____
RRR	_____
SEC	_____
WAW	_____
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AT&T's Second Comments**on Proposed Changes to Rule 25-22.032, F.A.C., Customer Complaints**

AT&T appreciates Staff's consideration of our last round of comments in this matter. As explained in earlier filed comments, regarding 25-22.032(5)(a) the draft rule proposes that the company "explain the company's actions in the disputed matter and the extent to which those actions were consistent with applicable statutes and regulations." This requires that the company representative responding to the complaint articulate legal and regulatory conclusions, which AT&T's customer care analysts are not qualified to make. Additionally, if this level of detail is to be required in a company response, the original complaint received from the Commission should include information about which statute or regulation the company is alleged to have violated.

AT&T urges the Commission to remove this requirement since the complaints received often do not contain sufficient details for the company to determine which statute or regulation they are being accused of violating. Indeed, many customers complain about issues which are clearly not a violation of a statute or regulation, but AT&T may choose to take specific actions purely as a customer satisfaction measure. If the company is to provide evidence of compliance with statutes or regulations, it seems only fair that the company know which statute or regulation is at issue.

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