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June 13, 2000

Martha Carter Brown, Esquire
Florida Public Service Commission
Division of Appeals
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket 991473-TP -- Telephone Quality of Service Rules

Dear Martha:

On September 29, 1999, the Commission opened docket 991473-TP to review and revise rules 25-4.066 through 25-4.081 and 25-24.840, Florida Administrative Code. Weeks before that, however, the Commission opened dockets 991376-TL, 991377-TL, and 991378-TL to initiate show cause proceedings against GTE, Sprint, and BellSouth for willful violations of many of these same rules.

Staff recently released draft rule changes that would severely weaken existing quality of service rules. For example, the rules currently require 95% of all out-of-service troubles to be repaired within 24 hours; the proposal would combine out-of-service conditions with service affecting troubles and only require that such conditions be repaired in an *average* of 24 hours. This change alone virtually doubles the amount of time allowed the companies to repair telephone lines that are not working. Similarly, the time allowed to install new primary telephone service would almost double, going from a requirement to install 90% of new service orders within three days to a requirement to install new service in an *average* of three days.

We believe it is imperative that the Commission hear all available evidence in the three show cause proceedings before taking up proposals that would degrade existing quality of service standards. Our office has already filed testimony in one of the show cause dockets, and we expect to file testimony in the other two within the next two months. The evidence presented in those

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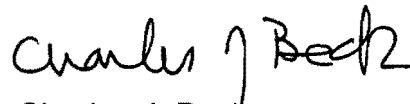
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dockets will review the reasons why the major local telephone companies willfully violated the Commission's quality-of-service rules over the last four years. It makes little sense to consider weakening the quality of service rules when the Commission hasn't even heard evidence about the extent of, and the reasons for, the companies' repeated past willful violations of the existing rules.

Thus, we propose that the evidentiary records from the three show cause proceedings be placed in this docket and that any changes to existing rules be taken up only after the Commission has heard all of the evidence in the show cause proceedings.

Sincerely,


Charles J. Beck
Deputy Public Counsel

cc: Cathy Bedell, General Counsel
Walter D'Haeseleer, Director, Division of Competitive Services
Rick Moses, Chief, Bureau of Service Quality, Division of Competitive Services
Blanca Bayo, Director, Division of Records and Reporting