

DOCKET NO. 991378-TL - BellSouth
Telecommunications, Inc.

WITNESS: **Direct Testimony of Phil Trubelhorn**
Appearing On Behalf Of Staff

DATE FILED: JUNE 29, 2000

- APP _____
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REGISTRATION REPORTING

1 Q. Please state your name and business address.

2 A. Phil Trubelhorn, 2540 Shumard Oak Boulevard, Tallahassee,
3 Florida 32399-0850.

4 Q. Where are you employed and in what capacity?

5 A. I am employed by the Florida Public Service Commission in the
6 Division of Competitive Services as a Utility
7 Systems/Communications Engineer in the Bureau of Service Quality.

8 Q. Please describe your communications and regulatory experience.

9 A. I joined the Commission in January 1995, after twenty-eight
10 years of telecommunications experience with Bell of Pennsylvania
11 and four other telecommunications firms. During my twenty years
12 with Bell of Pennsylvania, I worked in Outside Plant Engineering,
13 in Outside Plant Engineering Training, and in its Regulatory
14 Division's Rate Case group. I have a Bachelor of Science degree in
15 Industrial Engineering from Newark College of Engineering and a
16 Master of Business Administration degree from Drexel University.

17 Q. What are your responsibilities in your current position?

18 A. My current responsibilities--for the last 18 months--include
19 evaluating BellSouth's service performance by reviewing and
20 analyzing its Periodic Reports filed with the Commission by
21 Commission directive. My current responsibilities also include
22 performing and summarizing service evaluations of local exchange
23 companies, interexchange companies, pay telephone companies, and
24 other telecommunications companies. These evaluations include
25 initiating test calls, analyzing company data, making inspections,

1 reporting the results of the tests and inspections, analyzing
2 company responses, and issuing service evaluation reports showing
3 company performance in meeting the Commission's service standards.

4 Q. What is the purpose of your testimony?

5 A. To show that, from January 1996 through December 1999,
6 BellSouth Telecommunications, Inc. was in violation of Rule 25-
7 4.070(3)(a), Florida Administration Code (F.A.C.), which requires
8 restoration of interrupted service within 24 hours of the report;
9 Rule 25-4.073(1)(d), F.A.C., which requires 95% of all calls to
10 repair services to be transferred to a live attendant within 55
11 seconds when utilizing a menu driven, automated, interactive
12 answering system; and Rule 25-4.073(1)(d), F.A.C., which requires
13 85% of all calls to the business office to be transferred to a live
14 attendant within 55 seconds when utilizing a menu driven,
15 automated, interactive answering system. To further show that,
16 from January 1996 through December 1999, BellSouth was in violation
17 of Rule 25-4.066(2), F.A.C., which requires 90% of all requests for
18 primary service in any calendar month to be satisfied within three
19 working days; Rule 25-4.070(1)(b), F.A.C., which requires rebates
20 to be issued to customers whose service is interrupted other than
21 by a negligent or willful act of the subscriber and it remains out
22 of service in excess of 24 hours after being reported to the
23 company; and Rule 25-4.070(3)(b), F.A.C., which requires that
24 clearing of service affecting trouble reports be scheduled to
25 insure that at least 95% are cleared within 72 hours of the report.

1 See EXH PRT-1 for the full text of the rules cited.

2 Q. With respect to each of the above rules, what additional
3 information is pertinent to determining the company's performance
4 for each standard?

5 A. Rule 25-4.070(3)(a), F.A.C., applies to each of the company's
6 exchanges on a monthly basis, and the Commission standard is 95%
7 restoration within 24 hours; Rule 25-4.073(1)(d), F.A.C., for
8 calls to both repair services and to the business office, applies
9 to the company's performance on a monthly basis; Rule 25-4.066(2),
10 F.A.C., applies to each exchange on a monthly basis; Rule 25-
11 4.070(1)(b), F.A.C., applies to each automatic rebate required when
12 a subscriber's service remains out of service in excess of 24
13 hours; and Rule 25-4.070(3)(b), F.A.C., applies to each exchange
14 on a monthly basis.

15 Q. With respect to the violations and to determining the number
16 of violations of the above rules, what is a violation and how did
17 staff determine the number of violations?

18 A. A violation is the failure of the company to meet the service
19 standard required in the above rules. For example, where Rule 25-
20 4.070(3)(a), F.A.C., requires that the company restore 95% of
21 interrupted service within 24 hours, a violation occurs when the
22 company reported that it restored less than 95% of these reports.
23 Since this standard applies to each exchange on a monthly basis,
24 staff counts a violation for each exchange and each month that the
25 standard is missed.

1 Q. With respect to whether BellSouth failed to meet the
2 requirements of these rules, what kind of review or reviews did
3 staff undertake to make this determination?

4 A. Rule 25-4.0185, Periodic Reports, Florida Administrative Code,
5 (See EXH PRT-1) requires local exchange companies to file
6 information with the Commission on a quarterly basis addressing
7 their performance in meeting Commission service quality standards
8 for restoring interrupted service, answering calls to repair
9 services and to business offices, for installing new primary
10 service, for restoring service affecting troubles, and others. In
11 filing these periodic reports, the company attests that the
12 information provided is both true and accurate. Staff reviewed
13 these self-reported periodic reports for the period between January
14 1, 1996 through December 31, 1999. Since Rule 25-4.0185, F.A.C.,
15 does not require local exchange companies to report their
16 performance with respect to issuing rebates to customers whose
17 service was interrupted for more than 24 hours, staff used the
18 results of its annual service quality evaluations to measure the
19 company's performance in this area. Staff conducted BellSouth
20 service evaluations in 1996, 1997, 1998, and a reevaluation in
21 1999. In each evaluation, staff reviewed six-months of company
22 trouble reports in selected exchanges across the state, identifying
23 the out-of-service reports that required automatic rebates and
24 forwarding the information to BellSouth to investigate. Staff then
25 reviewed the company's response showing what rebates were provided

1 or were not provided.

2 Q. What did BellSouth's Periodic Reports from 1996 to 1999
3 indicate about its performance in meeting Rule 25-4.070(3)(a),
4 Florida Administration Code, which requires restoration of
5 interrupted service within 24 hours of the report?

6 A. The following BellSouth performance results can be found in
7 Exhibit PRT-2. I should point out that this rule applies to each
8 of the company's 102 exchanges on a monthly basis. In 1996,
9 BellSouth missed the restoration of interrupted service within 24
10 hours standard 1,113 times; the number of exchanges missing the
11 standard ranged from a low of 78 in November and December to a high
12 of 101 in January. The 1,113 violations are the sum of the number
13 of exchanges that missed the 95% standard from January through
14 December 1996. In 1997, BellSouth missed this standard 1,064
15 times; the number of exchanges missing the standard ranged from 77
16 in March to 101 in December. In 1998, BellSouth missed this
17 standard 988 times; the number of exchanges missing the standard
18 ranged from 38 in August to 101 in January, February, and November.
19 Then, in 1999, BellSouth missed this standard 1,110 times; the
20 number of exchanges missing the standard ranged from 78 in March to
21 102 (all exchanges) in September, October, and November.

22 Q. What did BellSouth's Periodic Reports from 1996 through 1999
23 indicate about its performance in meeting Rule 25-4.073(1)(d),
24 F.A.C., which requires 95% of all calls to repair services to be
25 transferred to a live attendant within 55 seconds after the last

1 digit of the telephone number listed in the directory for repair
2 services was dialed when utilizing a menu driven, automated,
3 interactive answering system?

4 A. The following BellSouth performance results can be found in
5 Exhibit PRT-3. I should point out that this rule sets forth a
6 monthly company standard as opposed to a monthly exchange standard.
7 BellSouth's reports showed that in 1996 it missed the repair
8 services answer time standard 18 times--missing the residential
9 repair 90% standard (calls answered directly) six times and the 95%
10 business repair services standard (calls answered by an Integrated
11 Voice Response Unit (IVRU)) 12 times. In 1997, BellSouth missed
12 the 95% repair services standard (both residential and business
13 repair calls answered by an IVRU) 23 times. In 1998, BellSouth
14 missed this 95% standard 20 times, split equally between calls to
15 residence and business repair services. Then, in 1999, BellSouth
16 missed this standard the maximum 24 times--12 times each to
17 residence and to business repair services.

18 Q. What did BellSouth's Periodic Reports from 1996 through 1999
19 indicate about its performance in meeting Rule 25-4.073(1)(d),
20 F.A.C., which requires 85% of all calls to the business office to
21 be transferred to a live attendant within 55 seconds after the last
22 digit of the telephone number listed in the directory for the
23 business office was dialed when utilizing a menu driven, automated,
24 interactive answering system?

25 A. The following BellSouth performance results can be found in

1 Exhibit PRT-3. I should point out that this rule sets forth a
2 monthly company standard as opposed to a monthly exchange standard.
3 BellSouth's reports showed that in 1996 and 1997 it missed the
4 business office answer time standard 24 times or all 24 months. In
5 1998, BellSouth missed this standard 11 times. In 1999, BellSouth
6 again missed this standard 12 times.

7 Q. What did BellSouth's Periodic Reports from 1996 through 1999
8 indicate about its performance in meeting Rule 25-4.066(2), F.A.C.,
9 which requires 90% of all requests for primary service in any
10 calendar month to be satisfied within three working days?

11 A. The following BellSouth performance results can be found in
12 Exhibit PRT-2. I should point out that this rule applies to each
13 of the company's 102 exchanges on a monthly basis. In 1996,
14 BellSouth missed the installation of primary service within three
15 working days standard 317 times; the number of exchanges missing
16 the standard ranged from a low of 14 in May to a high of 65 in
17 January. The 317 violations are the sum of the number of exchanges
18 that missed the 90% standard from January through December 1996.
19 In 1997, BellSouth missed this standard 473 times; the number of
20 exchanges missing the standard ranged from 12 in January to 88 in
21 December. In 1998, BellSouth missed this standard 645 times; the
22 number of exchanges missing the standard ranged from 13 in June to
23 100 in January. Then, in 1999, BellSouth missed this standard 610
24 times; the number of exchanges missing the standard ranged from 8
25 in May to 94 in October.

1 Q. What did staff's annual Service Evaluations indicate about
2 BellSouth's performance in meeting Rule 25-4.070(1)(b), F.A.C.,
3 which requires rebates to be issued to "all" subscribers whose
4 service is interrupted other than by a negligent or willful act of
5 the subscriber and it remains out of service in excess of 24 hours
6 after being reported to the company?

7 A. The following results are summarized on page 1 of Exhibit PRT-
8 4. Staff's 1996 service evaluation of five of the company's 102
9 exchanges indicated that BellSouth failed to issue 14 required
10 rebates; the company, therefore, missed the 100% automatic rebate
11 standard 14 times. (Pages 2 through 5 of Exhibit 4 come from
12 staff's BellSouth Service Evaluation reports from 1996 through
13 1999; they summarize the company's performance in clearing trouble
14 reports and in meeting Rule 25-4.070(1)(b), F.A.C. The number of
15 rebates missed equals the number of rebates due minus the number of
16 rebates made). In staff's 1997 service evaluation of BellSouth's
17 North Dade exchange, BellSouth missed this standard once. In
18 staff's 1998 service evaluation of four exchanges, BellSouth missed
19 this standard 37 times. Then, in staff's 1999 reevaluation of
20 1998's four exchanges, BellSouth missed this standard 20 times.

21 Q. What did BellSouth's Periodic Reports from 1996 through 1999
22 indicate about its performance in meeting Rule 25-4.070(3)(b),
23 F.A.C., which requires that clearing of service affecting trouble
24 reports be scheduled to insure that at least 95% are cleared within
25 72 hours of the report?

1 A. The following BellSouth performance results can be found in
2 Exhibit PRT-5. I should point out that this rule applies to each
3 of the company's 102 exchanges on a monthly basis. In 1996,
4 BellSouth missed the clearing of service affecting trouble reports
5 within 72 hours standard 122 times; the number of exchanges missing
6 the standard ranged from a low of 2 in November to a high of 33 in
7 January. The 122 violations are the sum of the number of exchanges
8 that missed the 95% standard from January through December 1996.
9 In 1997, BellSouth missed this standard 34 times; the number of
10 exchanges missing the standard ranged from 0 in May to 8 in
11 December. In 1998, BellSouth missed this standard 159 times; the
12 number of exchanges missing the standard ranged from 3 in June to
13 44 in October. Then, in 1999, BellSouth missed this standard 252
14 times; the number of exchanges missing the standard ranged from 0
15 in May, June, and July to 86 in October.

16 Q. Will you summarize your testimony about the number of
17 violations of the above standards and rules that BellSouth
18 reported?

19 A. Staff added BellSouth's reported number of violations per year
20 for each rule, found in Exhibits 2 through 5, and calculated the
21 total number of reported violations per rule from January 1, 1996
22 through December 31, 1999. See Exhibit 6 for a summary of the
23 violations.

24 Q. Does this complete your testimony?

25 A. Yes.

EXHIBIT NO. PRT-1

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Florida Administrative Code
Rule citations for the service rules violated
by BellSouth Telecommunications, Inc.

PROFFERING PARTY: STAFF

I.D.# PRT-1

25-4.070 Customer Trouble Reports.

(1) ... (b) In the event a subscriber's service is interrupted other than by a negligent or willful act of the subscriber and it remains out of service in excess of 24 hours after being reported to the company, an appropriate adjustment or refund shall be made to the subscriber automatically, pursuant to Rule 25-4.110 (Customer Billing). Service interruption time will be computed on a continuous basis, Sundays and holidays included ...

(3) Service Objectives:

(a) Service Interruption: Restoration of interrupted service shall be scheduled to insure at least 95 percent shall be cleared within 24 hours of report in each exchange as measured on a monthly basis ...

(b) Service Affecting: Clearing of service affecting trouble reports shall be scheduled to insure at least 95 percent of such reports are cleared within 72 hours of the report in each exchange as measured on a monthly basis.
Specific Authority: 350.127(2), F.S.

Law Implemented: 364.01(4), 364.03, 364.15, 364.17, 364.18, 364.183, 364.386, F.S.

History: Revised 12/1/68, Amended 3/31/76. (formerly 25-4.70), Amended 6/24/90, 3/10/96.

25-4.073 Answering Time.

(1) Each telephone utility shall provide equipment designed and engineered on the basis of realistic forecasts of growth, and shall make all reasonable efforts to provide adequate personnel so as to meet the following service criteria under normal operating conditions: ...

(c) At least ninety (90%) percent of all calls directed to intercept, directory assistance and repair services and eighty (80%) percent of all calls to business offices shall be answered within thirty (30) seconds after the last digit is dialed.

(d) Notwithstanding (c) above, when a company utilizes a menu driven, automated, interactive answering system ... For subscribers electing the option of transferring to a live assistant, except for business office calls, at least ninety-five (95%) percent of all calls shall be transferred by the system to a live attendant prepared to give immediate assistance within fifty-five (55) seconds after the last digit of the telephone number listed in the directory for the company's service(s) was dialed. Eighty-five (85%) percent of all such calls directed to any business office shall be transferred by the system to a live attendant within fifty-five (55) seconds after the last digit is dialed.

Specific Authority: 350.127(2), F.S.

Law Implemented: 364.01(4), 364.025, 364.03, 364.386, 365.171, F.S.

History: New 12/1/68, formerly 25-4.73, Amended 3/31/76, 11/24/92.

25-4.066 Availability of Service.

(2) Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied in each exchange or service center within an interval of three working days after receipt of application when all tariff requirements relating thereto have been complied with, except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

Specific Authority: 350.127(2), 364.14, F.S.

Law Implemented: 364.03, 364.14, 364.025, F.S.

History: Revised 12/1/68, Amended 3/31/76, formerly 25-4.66, amended 3/10/96.

25-4.0185 Periodic Reports.

Each local exchange telecommunications company shall file with the Commission's Division of Telecommunications the information required by Commission Form PSC/CMU 28 (3/96), which is incorporated into this rule by reference. Form PSC/CMU 28, entitled "Engineering Data Requirements," may be obtained from the Commission's Division of Telecommunications.

(1) The information required by schedules 2, 3, 4, 8, 11, 13, 14, 15, 16 and 20 of Form PSC/CMU 28 shall be reported on a quarterly basis by the large LECs and semiannually by the small LECs and shall be filed on or before the end of the month following the reporting period.

Specific Authority: 350.127(2), F.S.

Law Implemented: 364.01(4), 364.03, 364.17, 364.183(1), F.S.

History: New 12/16/86, Amended 7/20/89, 12/27/94, 3/10/96.

EXHIBIT NO. PRT-2

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Graphs of BellSouth's Periodic Reports (Schedules 2 & 11) for 1996 through 1999 showing the number of exchanges that missed the standards for installation of new primary service and restoration of interrupted service.

PROFFERING PARTY: STAFF

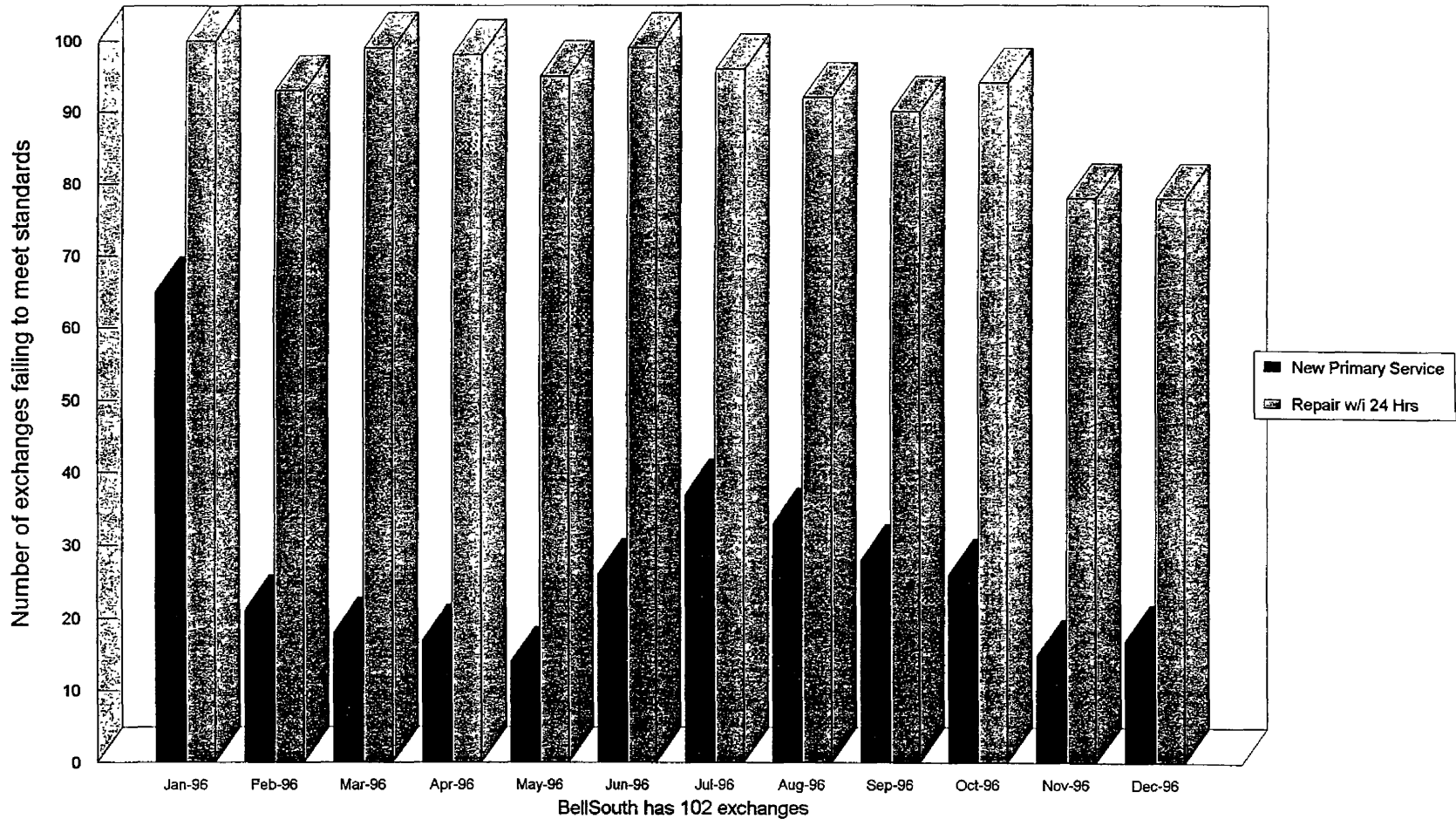
I.D.# PRT-2

BellSouth Telecommunications, Inc.

1996 New Primary Service within 3 days and OOS Repaired within 24 hours (Number of Exchanges Failing Standards) Schedules 2 & 11

	Jan-96	Feb-96	Mar-96	Apr-96	May-96	Jun-96	Jul-96	Aug-96	Sep-96	Oct-96	Nov-96	Dec-96	Totals
New Primary Service	65	21	18	17	14	26	37	33	28	26	15	17	317
Repair w/i 24 Hrs	101	93	99	98	95	99	96	92	90	94	78	78	1113

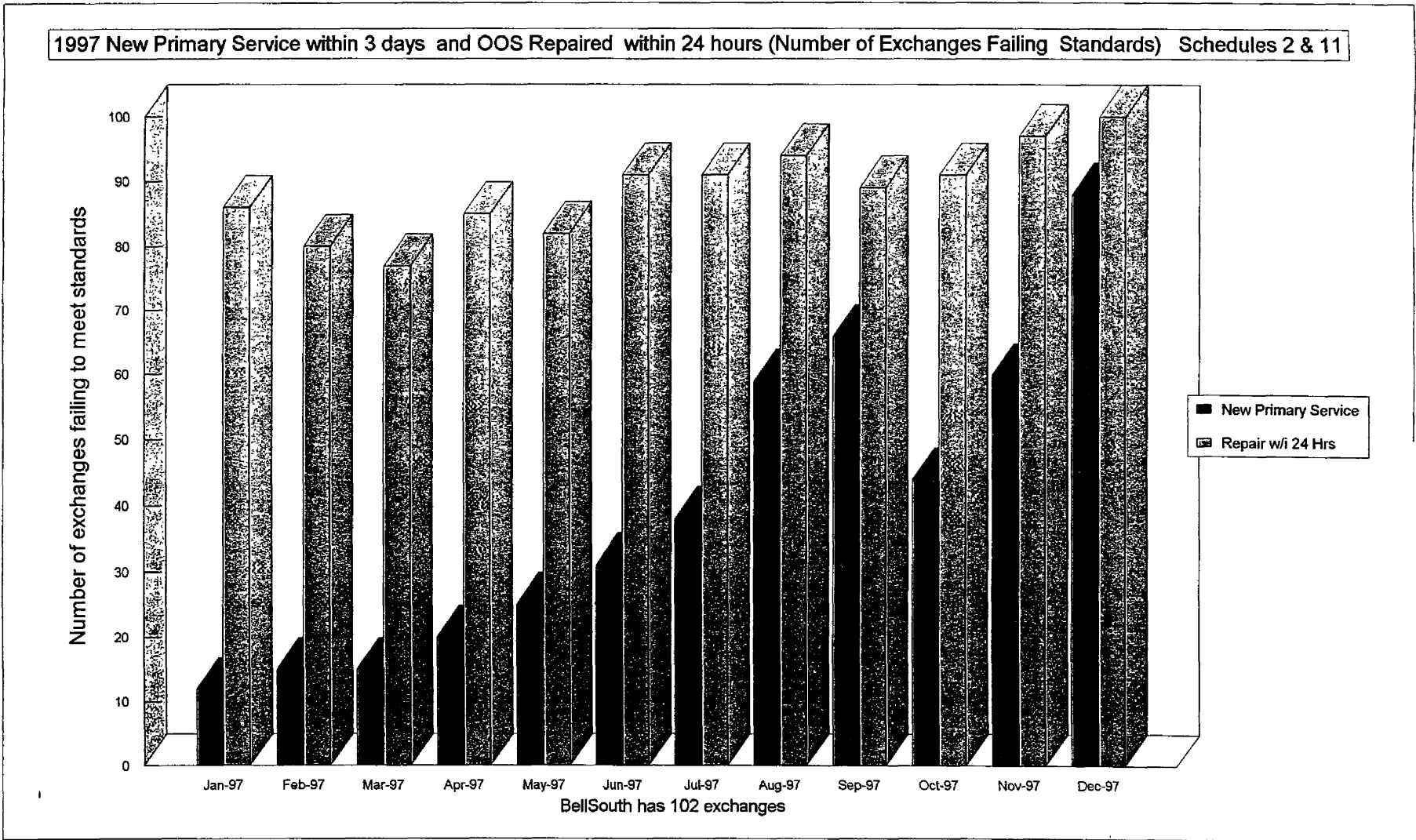
1996 New Primary Service within 3 days and OOS Repaired within 24 hours (Number of Exchanges Failing Standards) Schedules 2 & 11



BellSouth Telecommunications, Inc.

1997 New Primary Service within 3 days and OOS Repaired within 24 hours (Number of Exchanges Failing Standards) Schedules 2 & 11

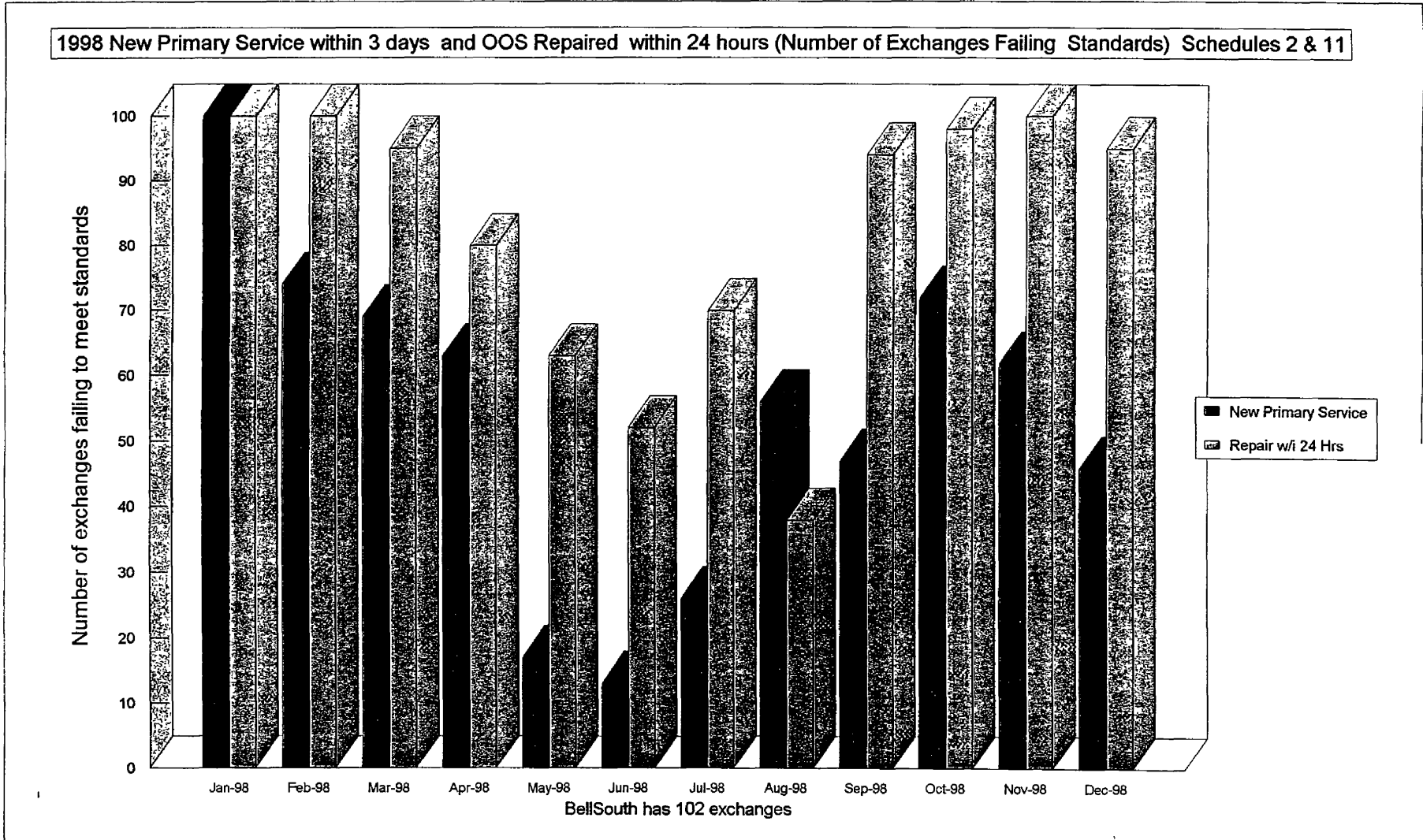
	Jan-97	Feb-97	Mar-97	Apr-97	May-97	Jun-97	Jul-97	Aug-97	Sep-97	Oct-97	Nov-97	Dec-97	Totals
New Primary Service	12	15	15	20	25	31	38	59	66	44	60	88	473
Repair w/i 24 Hrs	86	80	77	85	82	91	91	94	89	91	97	101	1064



BellSouth Telecommunications, Inc.

1998 New Primary Service within 3 days and OOS Repaired within 24 hours (Number of Exchanges Failing Standards) Schedules 2 & 11

	Jan-98	Feb-98	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98	Sep-98	Oct-98	Nov-98	Dec-98	Totals
New Primary Service	100	74	69	63	17	13	26	56	47	72	62	46	645
Repair w/i 24 Hrs	101	101	95	80	63	52	70	38	94	98	101	95	988



BellSouth Telecommunications, Inc.

1999 New Primary Service within 3 days and OOS Repaired within 24 hours (Number of Exchanges Failing Standards) Schedules 2 & 11

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	Totals
New Primary Service	68	49	22	15	8	23	29	56	71	94	87	88	610
Repair w/i 24 Hrs	98	80	78	79	84	95	93	97	102	102	102	100	1110

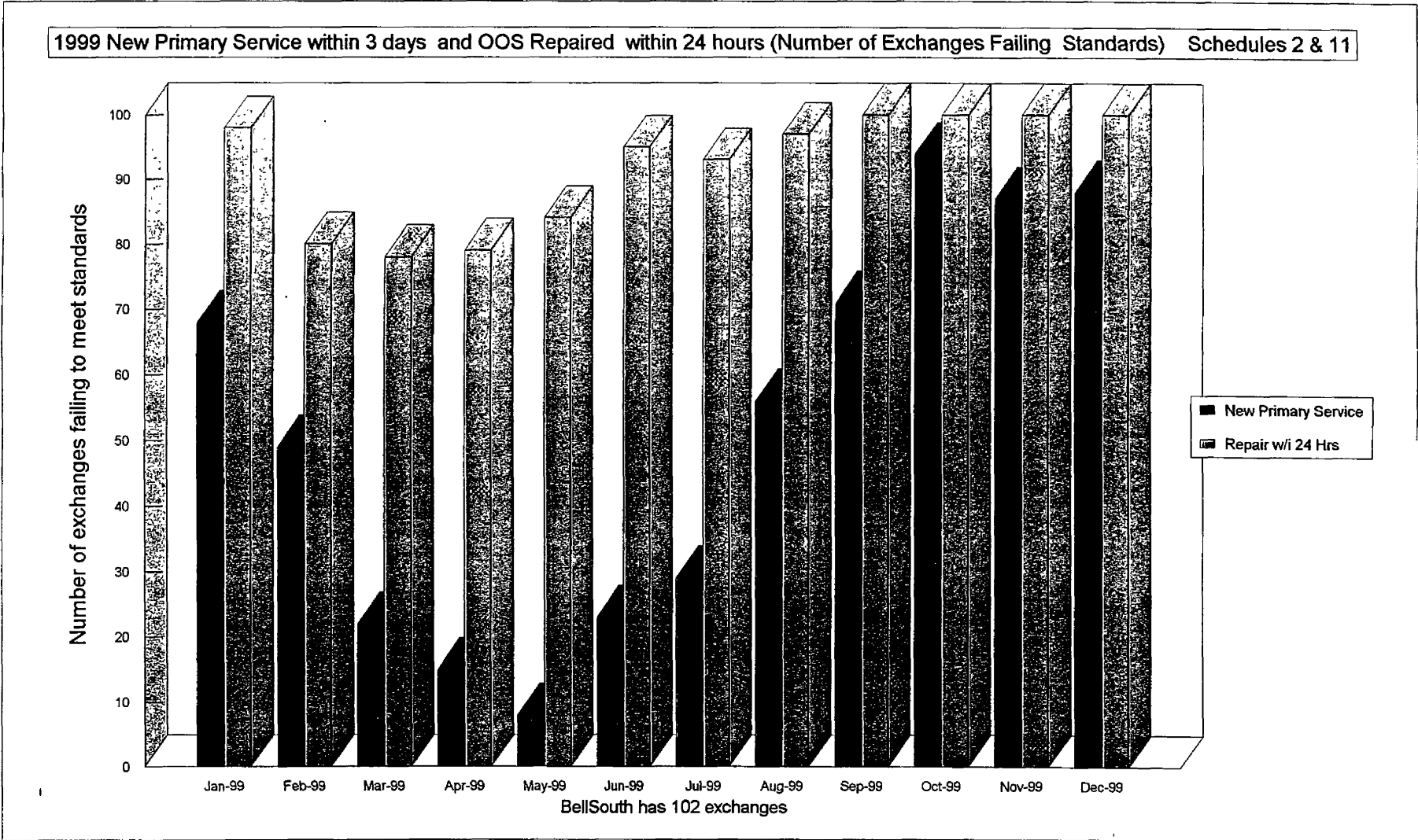


EXHIBIT NO. PRT-3

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Graphs of BellSouth's Periodic Reports (Schedules 15 & 16) for 1996 through 1999 showing the answer time results for the business office and repair services.

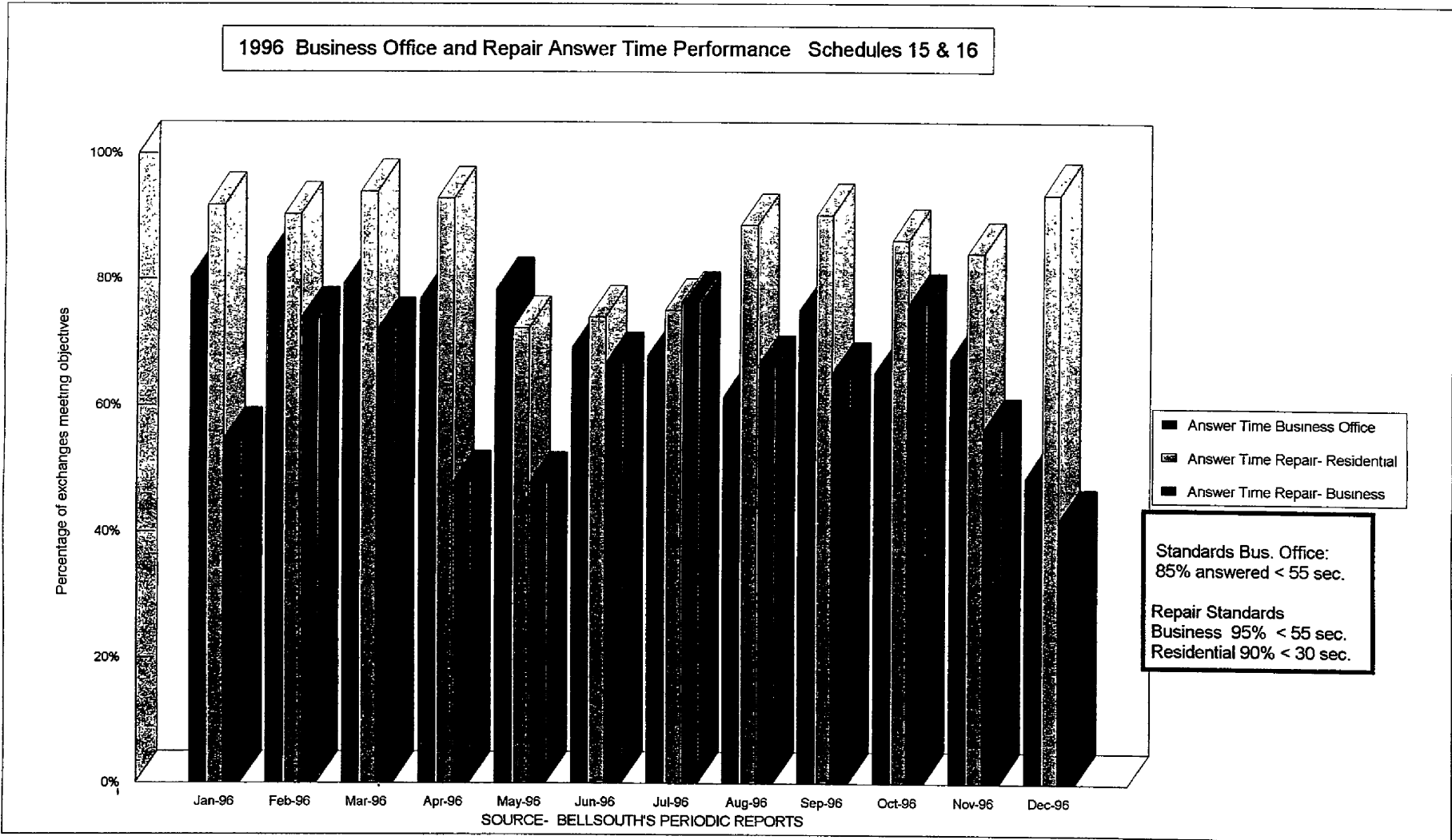
PROFFERING PARTY: STAFF

I.D.# PRT-3

BELLSOUTH TELECOMMUNICATIONS, INC.

1996 Business Office and Repair Answer Time Performance Schedules 15 & 16

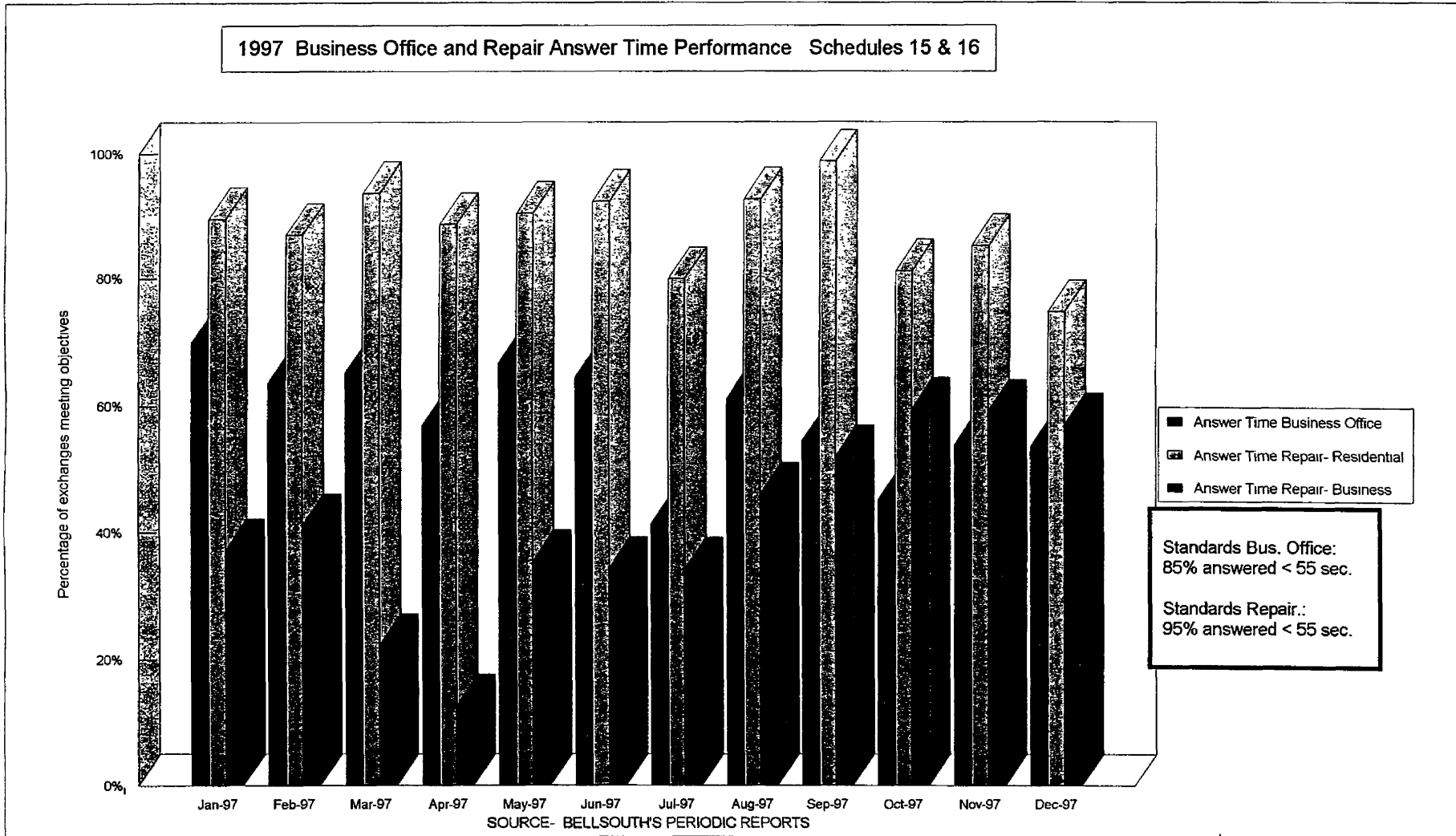
	Jan-96	Feb-96	Mar-96	Apr-96	May-96	Jun-96	Jul-96	Aug-96	Sep-96	Oct-96	Nov-96	Dec-96	No. Months Missed
Answer Time Business Office	80.4%	83.5%	79.4%	76.9%	78.5%	69.3%	67.9%	61.5%	75.2%	65.3%	67.5%	48.8%	12
Answer Time Repair- Residential	91.9%	90.4%	94.0%	92.9%	72.3%	74.1%	75.2%	88.8%	90.4%	86.4%	84.3%	93.7%	6
Answer Time Repair- Business	54.6%	73.7%	72.0%	47.8%	47.6%	66.7%	76.4%	66.2%	65.2%	76.1%	56.3%	42.0%	12



BELLSOUTH TELECOMMUNICATIONS, INC.

1997 Business Office and Repair Answer Time Performance Schedules 15 & 16

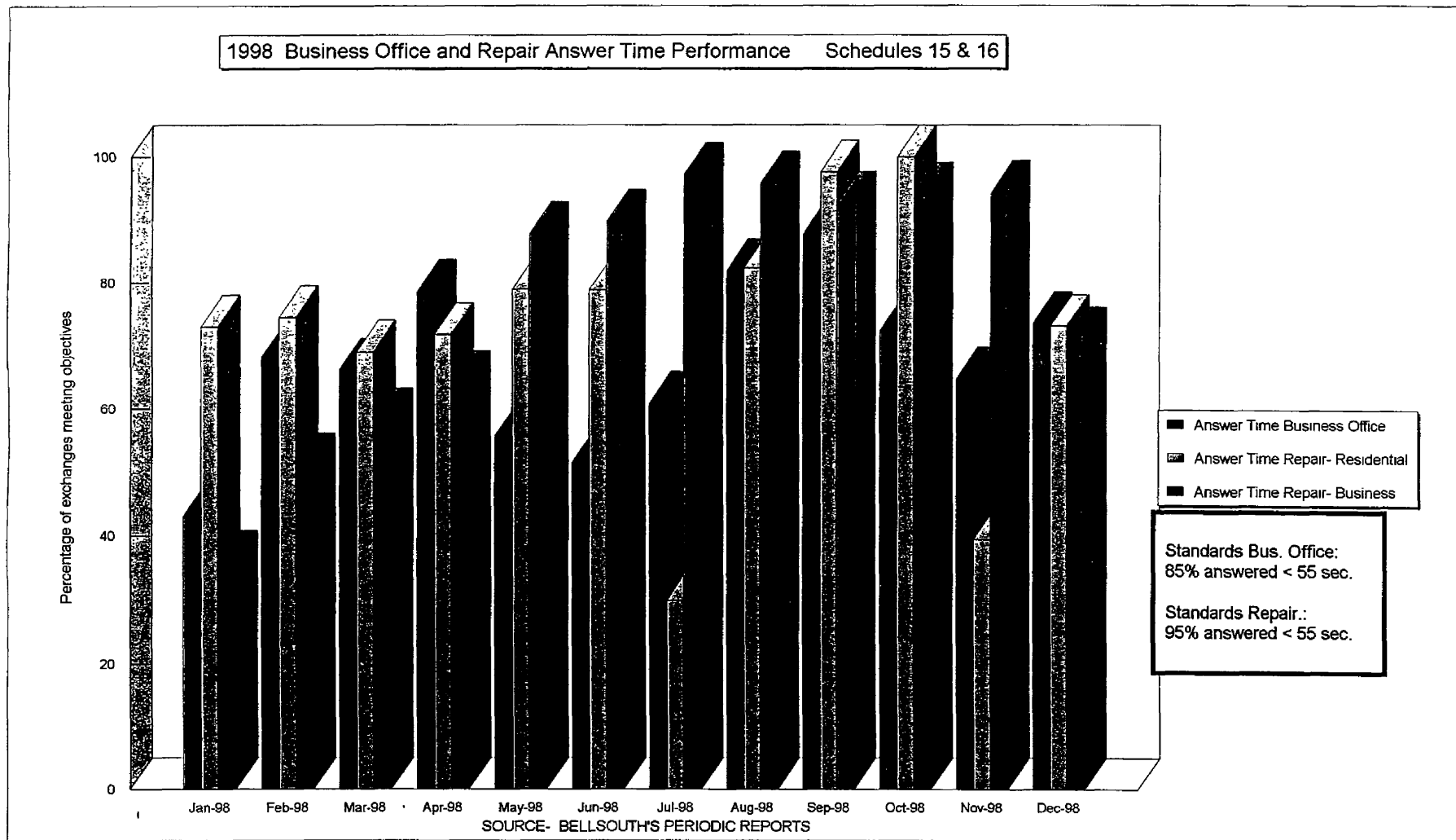
	Jan-97	Feb-97	Mar-97	Apr-97	May-97	Jun-97	Jul-97	Aug-97	Sep-97	Oct-97	Nov-97	Dec-97	No. Months Missed
Answer Time Business Office	69.9%	63.6%	65.2%	56.9%	66.8%	64.5%	41.4%	61.2%	54.6%	45.3%	53.9%	53.7%	12
Answer Time Repair- Residential	89.6%	87.0%	93.7%	88.7%	90.5%	92.4%	80.0%	92.7%	98.8%	81.3%	85.3%	74.9%	11
Answer Time Repair- Business	37.1%	41.1%	22.2%	12.6%	35.4%	34.3%	34.2%	46.1%	52.0%	59.5%	59.2%	57.1%	12



BELLSOUTH TELECOMMUNICATIONS, INC.

1998 Business Office and Repair Answer Time Performance Schedules 15 & 16

	Jan-98	Feb-98	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98	Sep-98	Oct-98	Nov-98	Dec-98	No. of Months Missed
Answer Time Business Office	43.0	68.2	66.2	78.6	55.7	51.6	60.9	82.0	87.8	72.5	64.9	73.8	11
Answer Time Repair- Residential	73.0	74.5	69.0	71.8	79.0	78.9	30.0	82.5	97.6	100.0	39.5	73.3	10
Answer Time Repair- Business	35.8	51.1	58.2	64.2	87.8	89.8	97.2	95.9	92.6	94.0	94.3	71.3	10



BELLSOUTH TELECOMMUNICATIONS, INC.

1999 Business Office and Repair Answer Time Performance Schedules 15 & 16

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	No. Months Missed
Answer Time Business Office	74.6%	65.2%	69.0%	73.1%	59.7%	43.0%	28.6%	27.4%	38.0%	60.8%	57.2%	68.0%	12
Answer Time Repair- Residential	61.5%	50.0%	78.0%	69.2%	89.7%	75.0%	86.8%	57.1%	75.8%	60.7%	40.0%	28.1%	12
Answer Time Repair- Business	42.7%	36.7%	36.0%	43.0%	48.7%	26.3%	51.7%	38.0%	18.0%	32.0%	27.7%	52.3%	12

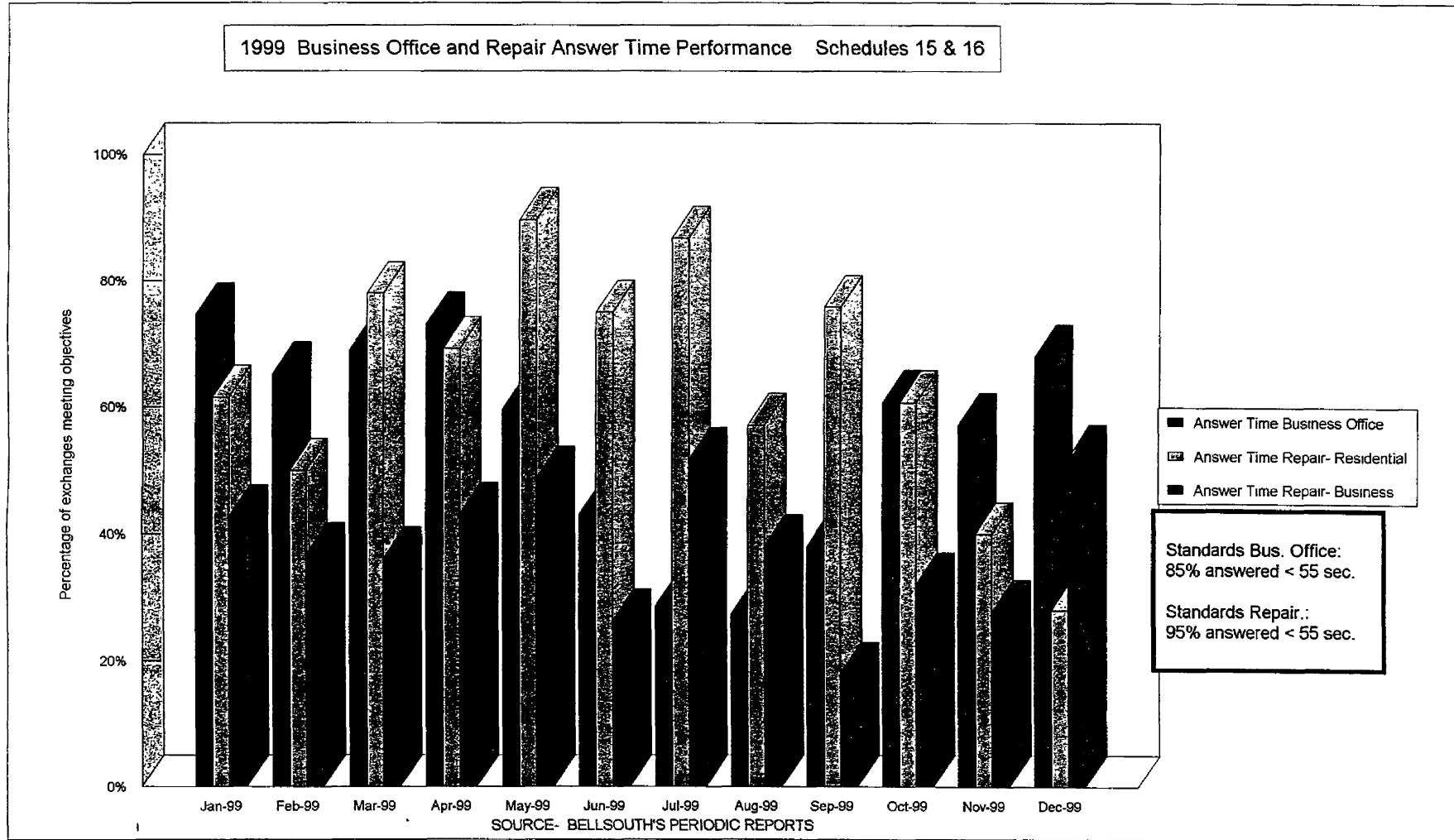


EXHIBIT NO. PRT-4

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Results of staff's service quality evaluations of BellSouth from 1996 through 1999 involving rebates issued for service interrupted in excess of 24 hours.

PROFFERING PARTY: STAFF

I.D.# PRT-4

BELLSOUTH TELECOMMUNICATIONS, INC.

Rebates Issued for Interrupted Service not Restored in 24 Hours-- Rules 25-4.070(1)(b) and 25-4.110(2)

FPSC Standard = 100%.

Source: 1996, 1997, 1998, and 1999 BellSouth Service Quality Evaluations

<u>Year</u>	<u>Rebates Due</u>	<u>Rebates Made (Issued)</u>	<u>Rebates Missed</u>	<u>Percentage of Rebates Issued</u>
1996	20	6	14	30.0%
1997	8	7	1	87.5%
1998	104	67	37	64.4%
1999	<u>65</u>	<u>45</u>	<u>20</u>	69.2%
Totals	197	125	72	

BellSouth Telecommunications, Inc.
 JULY 22 THRU SEPTEMBER 13, 1996

RULE 25-4.022
 25-4.070
 25-4.077
 25-4.110

EXHIBIT - 15A

Trouble Report Summary

<u>Reports Reviewed</u>	<u>S.A.</u>	<u>Non OOS</u>	<u>OOS</u>	<u>Excl</u>	<u>24-hrs Repair</u>		<u>Rebates</u>		<u>OOS Appointments</u>		
					<u>Due</u>	<u>Done</u>	<u>Due</u>	<u>Made</u>	<u>Total Made</u>	<u>Total Kept</u>	<u>%</u>
406	91	54	253	8	245	228	20	6	8	8	100.0

Repair Summary

	<u>Total -Appts</u>	<u>Same Day</u>	<u>W/I 24 Hrs</u>	<u>W/I 24-48 Hrs</u>	<u>Over 48 Hrs</u>	<u>W/I 72 Hrs</u>	<u>Over 72 Hrs</u>
Out of Service	245	167	228	16	1	N/A	N/A
Service Affecting	91	40	N/A	N/A	N/A	89	2

Company Percentages:

(1) Appointments....	100.0
(2) OOS Same Day....	85.2
(3) OOS - 24 Hour...	93.1
(4) Rebates.....	30.0
(5) S.A. 72 Hours...	97.8

<u>SA Appointments</u>		
<u>Total Made</u>	<u>Total Kept</u>	<u>%</u>
0	0	***.*

Note (1) 49 reports that were OOS Received after 3PM and not cleared that same day were removed from the Same Day calculation.

(2) Appointments are excluded from 24-hrs Due and all Company Percentage calculations.

BellSouth Telecommunications, Inc.
 MAY 5 THRU MAY 23, 1997

RULE 25-4.
 25-4.
 25-4.
 25-4.

EXHIBIT - 15A
Trouble Report Summary

Exchanges: NORTH DADE
 DATE 05/05/97 To 05/23/97

Reports Reviewed	S.A.	Non OOS	OOS	Excl	24-hrs Repair		Rebates		OOS Appointments		
					Due	Done	Due	Made	Total Made	Total Kept	%
204	47	0	120	37	107	100	8	7	13	13	100

Repair Summary

	Total -Appts	Same Day	W/I 24 Hrs	W/I 24-48 Hrs	Over 48 Hrs	W/I 72 Hrs	Over 72 Hrs
Out of Service	107	73	100	6	1	N/A	N/A
Service Affecting	42	27	N/A	N/A	N/A	42	0

Company Percentages:

- (1) Appointments.... 100.0
- (2) OOS Same Day.... 86.9
- (3) OOS - 24 Hour... 93.5
- (4) Rebates..... 87.5
- (5) S.A. 72 Hours... 100.0

SA Appointments

Total Made	Total Kept	%
5	5	100.

Note (1) 23 reports that were OOS Received after 3PM and not cleared that same day were removed from the Same Day calculation.
 (2) Appointments are excluded from 24-hrs Due and all Company Percentage calculations.

BellSouth Telecommunications, Inc.
 AUGUST 17 THRU OCTOBER 2, 1998

RULE 25-4.C
 25-4.C
 25-4.C
 25-4.1

EXHIBIT - 15A

Trouble Report Summary

COMBINED TOTALS

OOS Appointments

<u>Reports Reviewed</u>	<u>S.A.</u>	<u>Non OOS</u>	<u>OOS</u>	<u>Excl</u>	<u>24-hrs Repair</u>		<u>Rebates</u>		<u>OOS Appointments</u>		
					<u>Due</u>	<u>Done</u>	<u>Due</u>	<u>Made</u>	<u>Total Made</u>	<u>Total Kept</u>	<u>%</u>
700	152	0	538	10	486	393	104	67	52	51	98.

Repair Summary

	<u>Total -Adpts</u>	<u>Same Day</u>	<u>W/I 24 Hrs</u>	<u>W/I 24-48 Hrs</u>	<u>Over 48 Hrs</u>	<u>W/I 72 Hrs</u>	<u>Over 72 Hrs</u>
Out of Service	486	229	393	81	12	N/A	N/A
Service Affecting	139	56	N/A	N/A	N/A	139	0

Company Percentages:

(1) Appointments....	98.1
(2) OOS Same Day....	65.8
(3) OOS - 24 Hour...	80.9
(4) Rebates.....	64.4
(5) S.A. 72 Hours...	100.0

SA Appointments

<u>Total Made</u>	<u>Total Kept</u>	<u>%</u>
13	12	92.

- Note (1) 138 reports that were OOS Received after 3PM and not cleared that same day were removed from the Same Day calculation.
- (2) Appointments are excluded from 24-hrs Due and all Company Percentage calculations.

Rule 25-4.022
 25-4.070
 25-4.0770
 25-4.110

EXHIBIT - 15A
Trouble Report Summary

Totals For All Exchanges Reviewed

Survey Dates: January 01, 1999 through June 30, 1999

Reports Reviewed	S. A.	OOS	Excl	<-24 Hour Repairs->		Rebates	
				Due	Done	Due	Made
717	199	439	79	423	364	65	45

R e p a i r S u m m a r y

	Total Reports - Appointments	Same Day	Within 24 Hours	Between 24 and 48 Hours	Over 48 Hours	Within 72 Hours	Over 72 Hours
Out Of Service	423	149	364	51	9	N/A	N/A
Service Affecting	167	49	N/A	N/A	N/A	162	5

Exchange Summary * **

		OOS Appointments			Service Affecting Appointments		
		Made	Kept	Percentage	Made	Kept	Percentage
(1) OOS Appointments..	100.0%						
(2) OOS Same Day.....	64.2%						
(3) OOS - 24 Hours.....	86.1%	16	16	100.0%	32	32	100.0%
(4) Rebates.....	69.2%						
(5) S. A. - 72 Hours.....	97.0%						

* 191 OOS reports that were received after 3 pm and not cleared that same day were excluded from the "Same Day" calculation.

** Appointments are excluded from "24 Hour Repairs Due" and "Exchange Summary" calculations (2) through (5).

EXHIBIT NO. PRT-5

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Graphs of BellSouth's Periodic Reports (Schedule 11) for 1996 through 1999 showing the number of exchanges that missed the clearing of service affecting trouble reports standard.

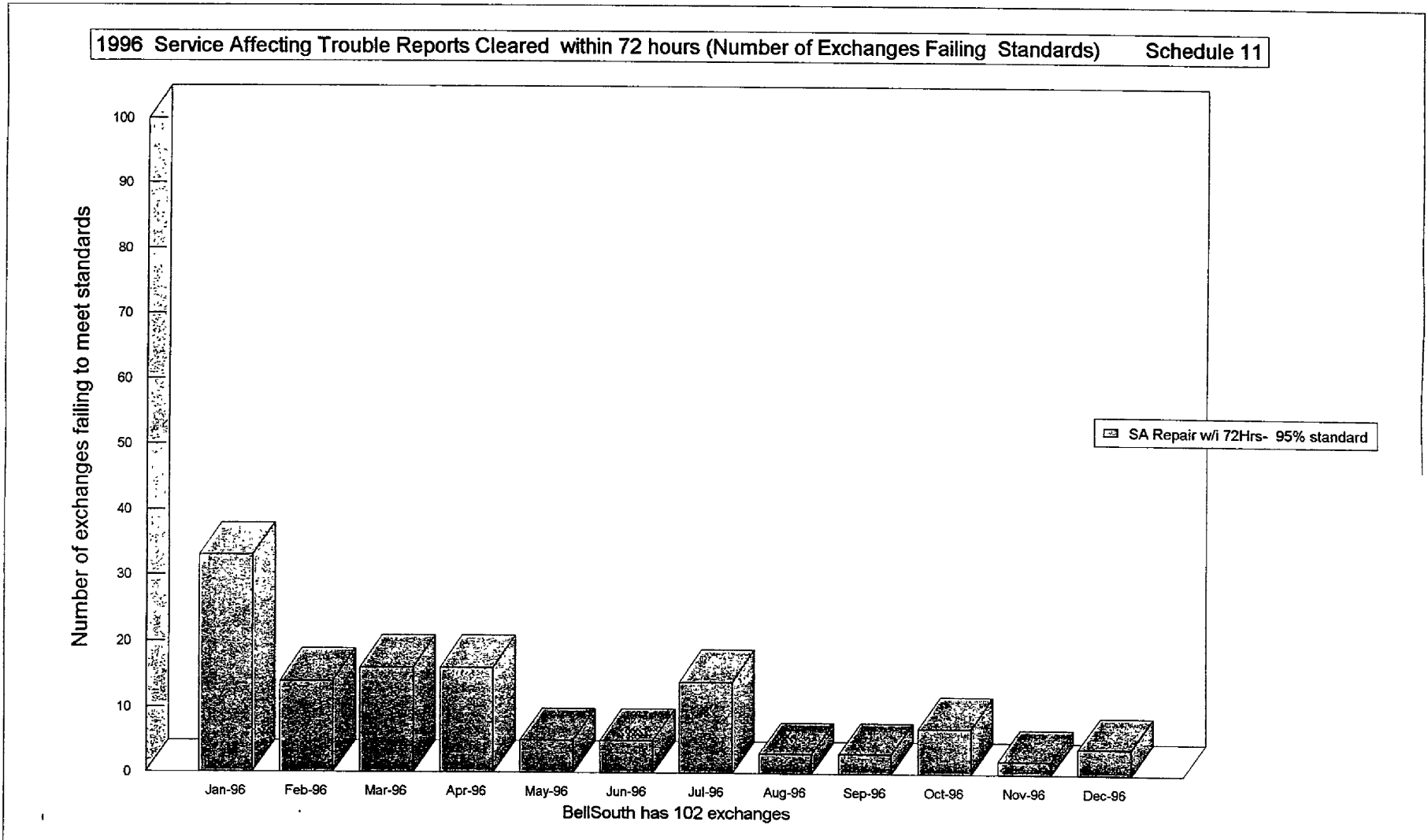
PROFFERING PARTY: STAFF

I.D.# PRT-5

BellSouth Telecommunications, Inc.

1996 Service Affecting Trouble Reports Cleared within 72 hours (Number of Exchanges Failing Standards) Schedule 11

	Jan-96	Feb-96	Mar-96	Apr-96	May-96	Jun-96	Jul-96	Aug-96	Sep-96	Oct-96	Nov-96	Dec-96	Totals
SA Repair w/i 72 Hrs	33	14	16	16	5	5	14	3	3	7	2	4	122

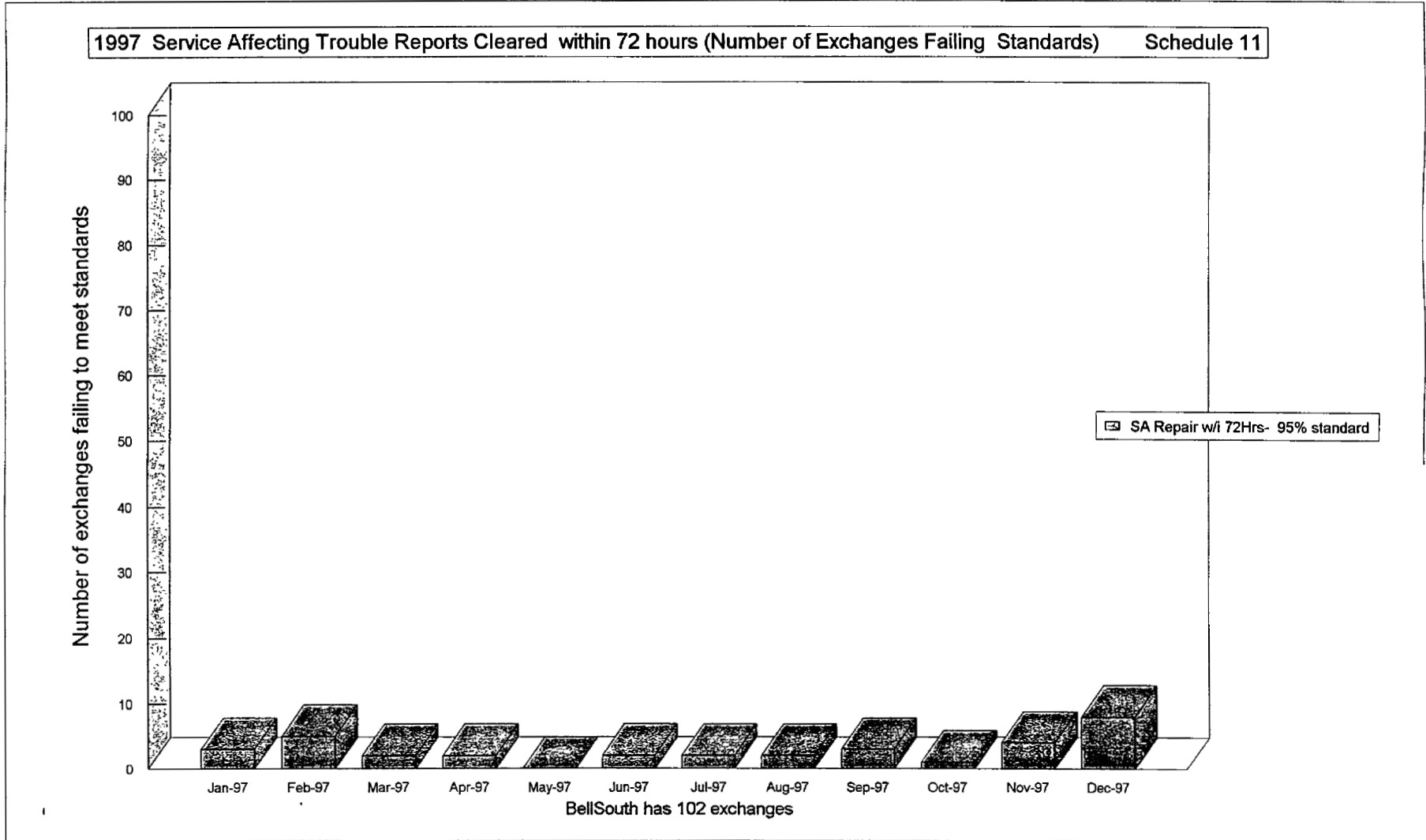


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BellSouth Telecommunications, Inc.

1997 Service Affecting Trouble Reports Cleared within 72 hours (Number of Exchanges Failing Standards) Schedule 11

	Jan-97	Feb-97	Mar-97	Apr-97	May-97	Jun-97	Jul-97	Aug-97	Sep-97	Oct-97	Nov-97	Dec-97	Totals
SA Repair w/i 72 Hrs	3	5	2	2	0	2	2	2	3	1	4	8	34

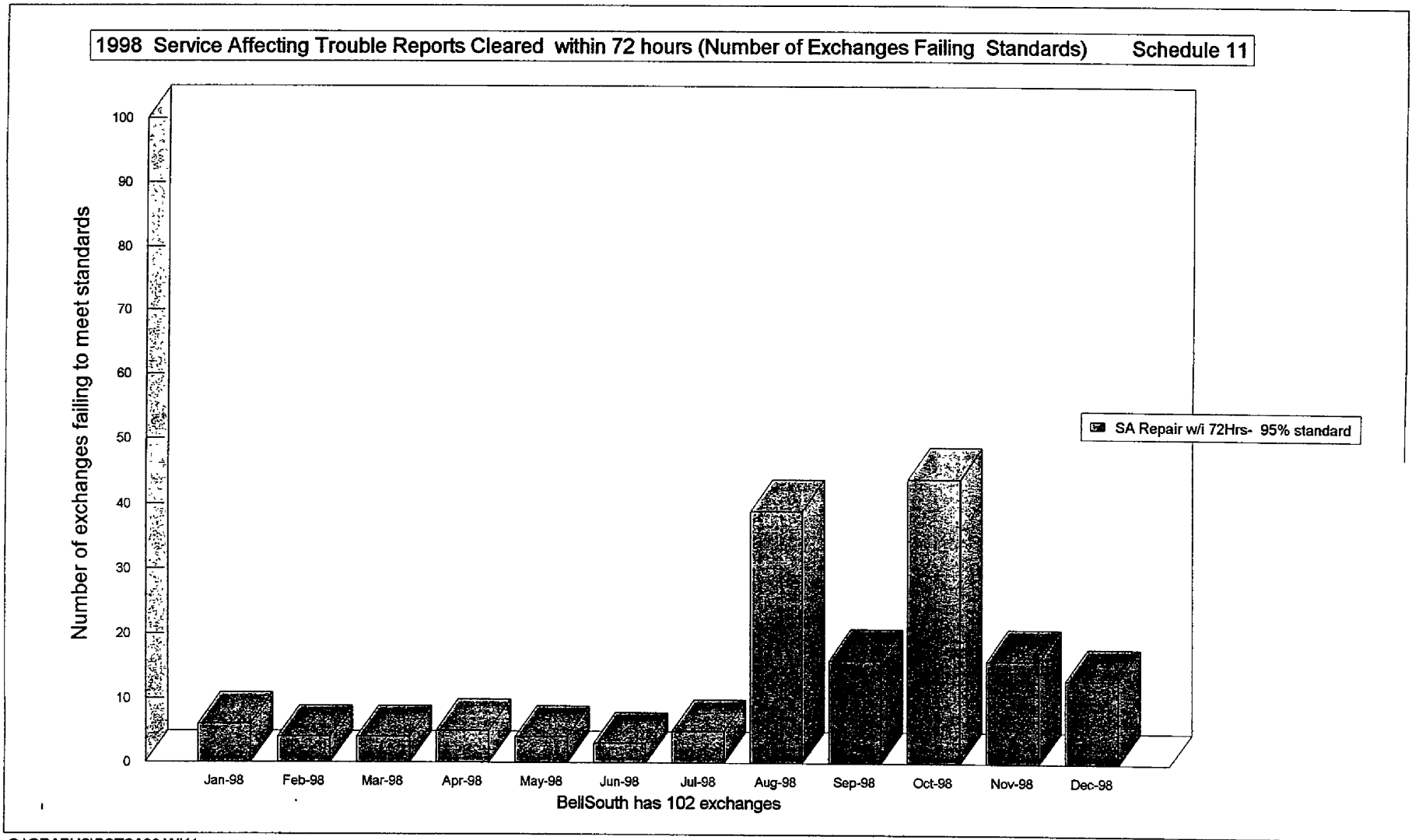


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BellSouth Telecommunications, Inc.

1998 Service Affecting Trouble Reports Cleared within 72 hours (Number of Exchanges Failing Standards) Schedule 11

SA Repair w/i 72 Hrs	Jan-98	Feb-98	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98	Sep-98	Oct-98	Nov-98	Dec-98	Totals
	6	4	4	5	4	3	5	39	16	44	16	13	159

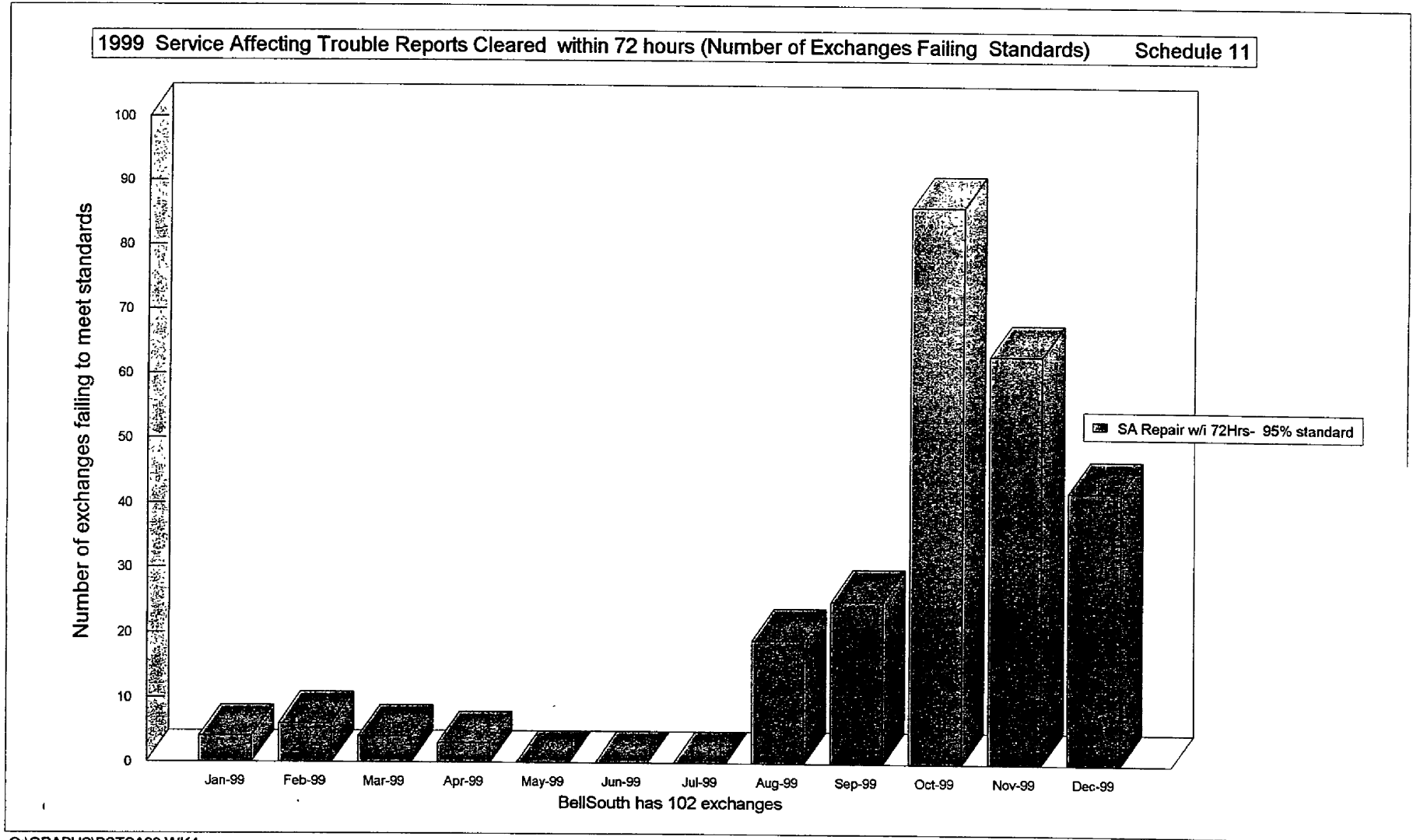


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BellSouth Telecommunications, Inc.

1999 Service Affecting Trouble Reports Cleared within 72 hours (Number of Exchanges Failing Standards) Schedule 11

SA Repair w/ 72 Hrs	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	Totals
	4	6	4	3	0	0	0	19	25	86	63	42	252



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EXHIBIT NO. PRT-6

DOCKET NO. 991378-TL

WITNESS: Phil Trubelhorn

PARTY: Florida Public Service Commission

DESCRIPTION: Table of the Rules Violated
and the Total Number of Reported Violations
from January 1, 1996 through December 31,
1999.

PROFFERING PARTY: STAFF

I.D.# PRT-6

SUMMARY OF RULES VIOLATED AND TOTAL NUMBER OF VIOLATIONS

This table presents the Rules violated and the total number of reported violations from January 1, 1996 through December 31, 1999:

Rule 25-4.070(3)(a), F.A.C., restoration of interrupted service within 24 hours	4275
Rule 25-4.073(1)(d), F.A.C., repair services answer time	85
Rule 25-4.073(1)(d), F.A.C., business office answer time	47
Rule 25-4.066(2), F.A.C., installation of primary service within three working days	2045
Rule 25-4.070(1)(b), F.A.C., automatic rebate for interrupted service in excess of 24 hours	72
Rule 25-4.070(3)(b), F.A.C., clearing of service affecting trouble reports within 72 hours	567

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause proceedings against BellSouth Telecommunications, Inc. for violation of service standards.

DOCKET NO. 991378-TP

FILED: June 29, 2000

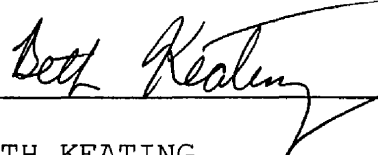
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's Direct Testimony and Exhibits of Phil Trubelhorn, have been served VIA U.S. MAIL, this 29th day of June, 2000, to the following:

Ms. Nancy H. Sims
BellSouth Telecommunications,
Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Mr. Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Suite 812
Tallahassee, FL 32399-1400

Mr. Michael A. Gross
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301



BETH KEATING
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199