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

Re: Docket No. 990994-TP - Proposed Amendments to Rule 25-4.110, F.A.C.,
Customer Billing for Local Exchange Telephone Companies

Dear Ms. Bayó,

Enclosed for filing in the above-referenced docket are the original and 15 copies of MCI WorldCom, Inc.'s Reply Comments of Mr. Richard Bondi.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance in this matter.

Sincerely,

Donna Canzano McNulty

Donna Canzano McNulty

APP	<u>1</u>
CAF	<u>1</u>
CMP	<u>3</u>
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SEC	<u>1</u>
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cc: Martha Carter Brown

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendments to Rule)	Docket No. 990994-TP
Rule 25-4.003, F.A.C., Definitions;)	
25-4.110, F.A.C., Customer Billing for)	Filed: August 16, 2000
Local Exchange Telecommunications)	
Companies; 25-4.113, F.A.C., Refusal or)	
Discontinuance of Service by Company;)	
Rule 25-24.490, F.A.C., Customer)	
Relations; Rules Incorporated; and)	
25-24.845, F.A.C., Customer Relations;)	
Rules Incorporated.)	

REPLY COMMENTS OF MR. RICHARD BONDI
ON BEHALF OF MCI WORLDCOM, INC.

MCI WorldCom, Inc. and its operating subsidiaries, (collectively "WorldCom") have joined in the reply comments filed by the FCCA, AT&T and ASCENT. In addition to those comments, WorldCom adds additional reply comments as follows.

Introduction

WorldCom recognizes that telecommunications companies have an obligation to provide customers with the information they need to make informed choices. Unlike the monopoly incumbent local exchange carriers (ILECs), WorldCom has never been guaranteed a customer base. From its inception, WorldCom has had to compete for, and earn, every one of its customers. Clear communications with customers, in the form of bills, marketing messages, advertisements and information delivered by account teams or customer service representatives, are essential for a telecommunications company to compete successfully in today's telecommunications marketplace. That is why WorldCom has spent millions of dollars and thousands of person hours surveying customers, training customer service representatives and account teams, updating billing

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formats, and developing national marketing messages to ensure that customers know and understand what WorldCom services, promotions, rates, and charges are available, and to ensure that our customers can contact us with any questions and concerns.

The marketplace is the most effective means for protecting consumer interests. For example, the long distance industry is competitive and consequently, consumers have many choices of providers and switch their providers often. Telecommunications companies that do not communicate effectively with their customers will lose those customers.

This Commission must carefully balance appropriate consumer protection against the consumer benefits of a fully competitive market. This Commission is to promote competition without unnecessary regulatory constraints, as fully explained by Sprint in its Initial Comments and the Competitive Carriers' responsive comments. Moreover, this Commission should not promulgate additional rules that would increase individual carrier's costs by millions of dollars annually -- costs that ultimately would be borne by end users in the form of higher rates. As stated in the joint filing, WorldCom strongly disagrees with the testimony filed by Staff, which suggests that the bill formatting and blocking rules should be made applicable to ALECs and IXC's.

Specific Comments

Rule 25-4.110(2), (Bill Formatting), Should Not Apply to ALECs or IXC's

The Commission has not provided supporting documentation, either by way of customer letters or by the number of complaints, related to the need for additional clarification of end user customer bills. Further, the FCC has recently enacted Truth In Billing (TIB) rules that focus on what it perceives to be key areas surrounding the

presentation and messaging of telecommunication bills to end users. WorldCom suggests that it is premature for the Commission to consider additional rulemaking on the subject of bill content or bill format at this time. Until these FCC mandated TIB rules can be implemented and their effects reflected in the marketplace, consideration of additional rules is overly burdensome for companies entering the local market and overly burdensome for IXC's who seek to obtain national uniformity for such rules.

WorldCom recommends that the Commission wait and determine the full impact of the FCC's TIB rules. If the Commission can demonstrate that customer confusion still exists after the TIB rules are implemented, the Commission should then address any remaining points specifically at that time. WorldCom further recommends that any such rulemaking allow ALECs and IXC's to retain company-specific bill formats to which customers are already accustomed and indeed may have specifically chosen via the competitive marketplace.

Moreover, WorldCom's preliminary estimate to implement proposed rule 25-4.110(2), F.A.C., is \$3 million for each of its ALEC and IXC subsidiaries offering residential service. Because the Staff has not demonstrated this to be a significant problem, the cost and regulatory burden with compliance of this proposed rule outweighs the benefit of imposing such a requirement on ALECs and IXC's.

Rule 25-4.110(19), (Billing Block), Should Not Apply to ALECs or IXC's

The proposed rules would require that ALECs and IXC's providing billing and collection services perform edits on the individual records of all companies that subscribe to its billing and collection services. Specifically, for those customers with billing

blocks, the billing and collection provider would edit all billing records received for that end user.

Presumably billing and collection providers would maintain a database of customers who have requested billing blocks and make this database available to its billing and collection subscribers. When billing records are received, the billing and collection provider would scan the bill records coming in, looking for matches in its database of customers that have requested billing blocks. Then the billing and collection provider would further edit the records for those customers, searching for any disallowed billing records. Where individual records are provided to the billing and collection provider the disallowed record types once identified, would be blocked from the customer bill.

In addition to the higher costs, these rules are likely to cause other issues with end users. These include increased lag times between the cut off dates of the billing and collection subscriber calls to the date of the end user customer invoice for all end user customers served by the billing and collection provider.

Moreover, such a billing block option would be costly to implement. WorldCom's preliminary estimate to implement proposed rule 25-4.110(19), F.A.C., is \$4 million for each of its ALEC subsidiaries that will offer local residential service and \$5-6 million for each of its IXC subsidiaries that offer residential service. Neither of these estimates reflects ongoing maintenance costs. As indicated in our joint comments, that while the Commission has received *no* ALEC cramming complaints and very few IXC complaints, Staff appears to suggest these rules should be imposed on the competitive industry to remedy very few complaints, while costing millions of dollars to implement

and impeding competition. Thus, the burden of the additional costs of complying with this proposed rule appears to significantly outweigh the benefits.

Conclusion

WorldCom respectfully requests that this Commission should not apply the bill formatting and bill blocking rules to ALECs and IXC's. The cost of complying with such rules significantly outweighs any benefit, especially given that there is no demonstrated problem.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 16th day of August, 2000.

AT&T Communications of the
Southern States, Inc.
Marsha Rule
101 North Monroe Street,
Suite 700
Tallahassee, FL 32301-1556

BellSouth Telecommunications,
Inc.

Ms. Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Billing concepts, Inc.
W. Audie Long/Donald R. Philbin
7411 John Smith Drive Suite 200
San Antonio, TX 78229

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301

Florida Competitive Carriers
Asso
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, FL 32301

MCI WorldCom
Ms. Donna C. McNulty
325 John Knox Road, Suite 105
Tallahassee, Fl 32302-4131

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, Fl 32302

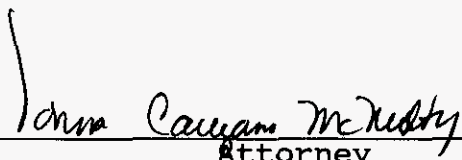
Onepoint Communications
Edward Marsh
2201 Waukegan Road, suite E-200
Bannockburn, IL 60015

Chester Osheyack
10410 Zackary Circle, Apt. 28
Riverview, FL 33569-3994

Sprint Communications Company
Limited Partnership
Charles J. Rehwinkel
P.O. Box 2214
Tallahassee, Fl 32316-2214

Verizon Select Services, Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Martha Carter Brown*
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Attorney