

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 991378-TL
Filed: March 22, 2001

SURREBUTTAL TESTIMONY

OF

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On Behalf of the Citizens of the State of Florida

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DECLASSIFIED

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R. EARL POUCHER
FOR
THE OFFICE OF PUBLIC COUNSEL
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991378-TL

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of this testimony is to offer surrebuttal testimony to the rebuttal
3 testimony filed on behalf of BellSouth in this docket by Joseph P. Lacher.

4 **Q. On page 4 of his testimony, Mr. Lacher disagrees with your statement**
5 **that the rules at issue in this case are the rules most important to**
6 **customers. What is your response?**

7

8 A. Mr. Lacher's states in his testimony that the rules at issue in this docket are
9 not the most important to customers. He states, "In my years with BellSouth,
10 I have found that the most important thing to customers is to do what the
11 company says it will do when the company says it will do it. Customers do
12 not necessarily translate that desire into a three-day installation and 24-hour
13 repair rule."

14

15 Mr. Lacher's statement reflects his opinion, and, of course, it is important to
16 keep your commitments. However, I would refer you to a letter to BellSouth
17 Network Vice Presidents in February 1999 from BellSouth Headquarters that
18 states in the first paragraph that "In studies by Consumer and Small
19 Business, speed of repair and speed of installation were the key factors

1 identified” as the primary drivers of customer satisfaction. (Exhibit REP-48)

2

3 I would also refer you to the South Florida Network Business Plan for the
4 year 2000 as a more complete listing of the key drivers for customer
5 satisfaction. (Exhibit REP-41) Here is BellSouth Network's plan to deliver
6 customer satisfaction for installation and repair:

7 “Customer Satisfaction

8 Our objectives for service provisioning/service assurance will address
9 three key customer objectives:

- 10 1. Complete the work by the time promised
- 11 2. Do it right the first time
- 12 3. And do the work in a timely manner

13 We have partnered with COU's and selected the MDP measurements
14 that best illustrate our position in meeting customer satisfaction.

- 15 1. % appointments met
- 16 2. % SOI and % repeat rate
- 17 3. % Service orders worked within 3 days
- 18 4. % Cleared within 24 hours”

19 The fact that customers really do care about how long it takes to clear a
20 trouble is also demonstrated by Exhibit REP-42 that is a chart labeled
21 “BellSouth Business Regional POTS Repair Regression”. This BellSouth
22 document states, “Every 1 hour increase in receipt-to-clear time translates
23 into a 1 point satisfaction decrease in overall repair satisfaction.” It is my
24 belief that customers are extremely sensitive about speedy restoration of
25 telephone outages and installation of service.

1 Overemphasis on keeping commitments in the BellSouth Network
2 organization has led the company toward operational strategies that
3 adversely impacts customer satisfaction. Exhibit REP-33, page 1, is a late
4 1999 e-mail from South Florida Consumer (that's the business office
5 operation) to South Florida Network complaining about extended "installation
6 intervals as far out as 13 days, on the average, for some areas". The
7 message continues, stating, "With increasing competitive activity this is the
8 worst time to be risking customer dissatisfaction....and factors such as longer
9 installation intervals....are impacting Customer Satisfaction measurements."

10

11 Exhibit REP-39, pages 4-7 is another BellSouth Consumer document dealing
12 with the same subject. Page 4 graphically shows the decline of customer
13 satisfaction between January 1997 and July 1999. Page 5 shows the
14 Customer Care Strategy, stating first that their goal is to provide service in
15 time with customer expectations.

16

17 For customers, timely repair and installation is extremely important. "Quick
18 Response is one of the most important aspects of the repair process to
19 customers, and has the most impact on their satisfaction." This statement is
20 shown on Exhibit REP-21, Page 4 in a BellSouth Business chart titled,
21 "Internal Performance: Repair Duration (POTS). The same thought is
22 reflected in the May 21, 1999 document from BellSouth Headquarters that
23 states speed of installation and speed of repair are major drivers of customer
24 satisfaction (Exhibit REP-49).

25

1 The BellSouth Consumer organization echos the same thought in its January
2 7, 2000 review of service measurements. This document states that
3 customer satisfaction is affected by the following:

- 4 ▶ Out of Service over 24 hours
- 5 ▶ Service Affecting over 48 hours
- 6 ▶ Installation intervals over 5 days

7 These statements are found in Exhibit REP-24, page 2. On page 1 of the
8 same exhibit it states that customers "would prefer a 3 day interval on
9 installation." In essence, the BellSouth Consumer organization supports use
10 of the Florida PSC's primary measurements that are at issue in this docket
11 as the measurements that best indicate the level of customer satisfaction.

12

13 Likewise a May 1998 TELSAM survey of the key drivers of customer
14 satisfaction produced this quote: "The drivers identified as having the most
15 impact on customer satisfaction were Speed and Rep. Effectiveness. These
16 results are consistent across the nine-state region." (Exhibit REP-50).

17

18 These BellSouth policy statements regarding key drivers for customer
19 satisfaction relate not only to the issue of customer priorities, but also to
20 BellSouth's often stated position that the current rules are outmoded. Since
21 the ultimate goal is to satisfy customers, I conclude based on the
22 preponderance of evidence found in BellSouth's files that the best measures
23 for installation and repair for the past four years and for the future are the
24 existing standards contained in the existing PSC rules for 3 day installation
25 and restoral of service outages within 24 hours.

1 **Q. On page 10 of his testimony, Mr. Lacher states in response to the**
2 **company's use of final status time for calculating the length of an**
3 **outage that "BellSouth wanted to create a vehicle that protected our**
4 **reputation, as well as provided a clear audit trail." What is your**
5 **response?**

6 A. BellSouth implemented the use of the final status time for calculating its
7 repair results in order to reach a settlement with the Statewide Prosecutor
8 and avoid prosecution in 1992. The use of the final status time was agreed
9 to with the Statewide Prosecutor because of the falsification of repair times
10 by BellSouth employees that resulted in customers not receiving rebates for
11 service outages and in filing of PSC quarterly reports that were not correct.

12

13

14 The Statewide Prosecutor's investigators specifically targeted this weakness
15 in the BellSouth system that allowed employees to compromise the reporting
16 process. BellSouth's settlement with the Statewide Prosecutor was reached
17 in order to avoid criminal charges being filed against the company, and, as
18 the Public Counsel witness in this docket, I never saw any evidence to
19 suggest that it was the company's idea to adopt this change.

20 **Q. Regardless of the motives, doesn't this change in procedure extend the**
21 **repair times being reported to the Commission in terms of compliance**
22 **with the rule?**

23 A. Not necessarily. The method currently in use by BellSouth does extend the
24 clearing time, however, the company could have easily adopted other
25 alternatives that would have satisfied the requirements of its agreement with

1 the Statewide Prosecutor without negative impact on its repair clearing times.

2

3

4 The agreement with the Statewide Prosecutor simply stated that the
5 company would use the final status time for its clearing time in calculating the
6 results. The company could just as easily have instructed its employees to
7 immediately close out a trouble report when the customer's trouble was
8 cleared through use of the final status time, which is machine generated and
9 not subject to manipulation.

10

11 The activities described by Mr. Lacher generally comport to the company's
12 definition of routine maintenance. If routine maintenance activities such as
13 tree-trimming and replacement of the network interface device are required
14 in connection with a trouble visit, BellSouth repair personnel can charge their
15 times to the routine maintenance code without affecting the company's
16 performance under the rule. Exhibit REP-43 shows the 29 specific codes that
17 the company uses to exclude trouble reports from PSC measurement. Page
18 8 of that exhibit shows the cause code 699 that can be used for routine work.

19

20 **Q. On page 11 of his testimony, Mr. Lacher describes the functions that an**
21 **installer could engage in following clearing of a trouble in making his**
22 **point that the final status time had a negative impact on BellSouth's**
23 **ability to meet the Commission's rule on out-of-service repairs within**
24 **24 hours and he states that it is not possible to do a current study to**
25 **calculate this time. What is your response?**

1 A. Exhibit REP-44 is a copy of a BellSouth study that was completed in 1997
2 at the direction of Mr. Lacher to answer his questions regarding the impact
3 of use of the final status time. The study involved April Ivey, Gary Hall, Jerry
4 Moore, Jerry Pellegrini, Laura Dinan and Wayne Tubaugh, who are all highly
5 respected Network Managers in the Florida Network organization.

6
7 The results of this study are shown in Exhibit REP-44. They show, on page
8 2, that if BellSouth instituted the cleared time rather than the final status time
9 in calculating its results, the company would have met the PSC rule in 15
10 exchanges in Florida in May of 1997, as opposed to the 12 exchanges that
11 were reported in compliance. BellSouth had 102 exchanges at that time, so
12 it would have violated the PSC rule 87 times in May 1997, rather than the
13 90 violations it reported. In June 1997, the report shows that the company
14 violated the PSC rule 95 times under either scenario. The results obtained
15 by use of the cleared time improved the percentage of out of service troubles
16 cleared within 24 hours by 1.15% in May and 1.25% in June. A 1%+
17 change in the results for BellSouth is of little value when the company is
18 failing to meet the rule in the overwhelming majority of its exchanges.
19 During the years at issue in this docket, the company has failed to meet the
20 repair rule in 88% of the opportunities. That means the success rate for this
21 measurement is 12% over 4 years.

22
23 I might add that the files we were given in response to our discovery request
24 make no suggestion that the 1997 study was not valid.

25 **Q. On Page 13, Mr. Lacher states that the company's results are also**

1 negatively impacted by its calculations of clearing times when a trouble
2 is “no accessed” within 24-hours. What is your response?

3 A. The agreement with the Statewide Prosecutor included modification of the
4 methods used by BellSouth personnel to “stop the clock” on a trouble report
5 by using an intermediate “CON” status code. The abuse of this code by
6 BellSouth employees was well documented by the Statewide Prosecutor’s
7 investigators. The 1997 BellSouth study (Exhibit REP-44, page 3) showed
8 that changing the “no access” procedures in addition to the receipt to clear
9 calculations would have resulted in 13 additional exchanges meeting the rule
10 in May 1997 and 6 additional exchanges meeting the rule in June 1997.
11 Even including both calculations, the company still had 75 exchanges that
12 would have failed to meet the rule in May 1997 and 89 in June 1997. The
13 company has been free to revert to its old procedures since October 1997.
14 Once again, the difference is minimal, when compared against the
15 magnitude of the company’s total violations.

16 **Q. Mr. Lacher states that during the Settlement Agreement (October 1,**
17 **1992 through October 1, 1997) the company asked the customer if they**
18 **considered their line to be out of service and if they said yes, we**
19 **classified the trouble as out of service, irrespective of what our tests**
20 **indicated. What is your response?**

21 A. Mr. Lacher is correct. The Commission rule requires a trouble to be
22 classified as out of service when the customer states that it is out of service.
23 All Florida LECs must comply with this rule. BellSouth is certainly free to
24 criticize the rules of the PSC, but that does not mean BellSouth should be
25 allowed to ignore those rules, while the 9 other LECs in Florida who are

1 currently meeting most of the standards of the Commission apply the rules
2 as they are stated.

3 **Q. On pages 18 and 19, Mr. Lacher discusses conversations with the**
4 **Office of Public Counsel regarding the company's inability to meet the**
5 **rules and that since 1993 "BellSouth and the Office of Public Counsel**
6 **have discussed the need to revise current Commission rules." What**
7 **is your response?**

8 A. Since early 1994, BellSouth and the Office of Public Counsel have had
9 constructive conversations regarding BellSouth's problems with the rules and
10 the company's inability to meet them. However, I would want to emphasize
11 that there has never been any agreement with BellSouth that Public Counsel
12 would take the position that BellSouth should not be held to the same
13 standards applicable to other telephone companies in Florida.

14 **Q. Mr. Lacher states that it was his erroneous assumption that everyone**
15 **was aware of the changes and that no action would be taken for**
16 **BellSouth's reported results until the rules were changed. What is your**
17 **comment?**

18 A. I can state without reservation that the Office of Public Counsel has never
19 indicated to BellSouth that the company should be excused for its rule
20 violations, as evidenced by our participation in this docket. In addition, prior
21 to his death, I had numerous conversations with Alan Taylor of the PSC
22 Staff, and I have never heard him voice the opinion that the PSC staff was
23 not going to enforce its rules. Of course, Mr. Taylor's successor opened this
24 docket, and the PSC files include numerous letters from Don McDonald of
25 the PSC Staff questioning the company's failure to meet the rules.

1 Q. On page 21 of his testimony, Mr. Lacher states you were incorrect in
2 your assertion that BellSouth failed to add the number of employees to
3 its force that you claimed. What is your response?

4 A. I would not argue with Mr. Lacher about his organization's headcount. There
5 are numerous budgetary methods used to calculate headcount. However,
6 Mr. Lacher states that my testimony is incorrect and I disagree. My
7 testimony on page 15 uses the Average Network employees shown on
8 BellSouth's budget data in Exhibit REP-6, pages 2 and 3. These numbers
9 are exactly the same as my testimony as stated: BellSouth's Network
10 organization records show that their average headcount in 1996 was 8,296,
11 7,841 in 1997, 7,643 in 1998 and 8,256 in 1999. The 1999 number was also
12 the forecasted average headcount furnished by BellSouth in response to
13 Citizen's 1st Request for Production of Documents. For whatever it's worth,
14 the numbers are exactly as furnished by BellSouth. Since BellSouth stated
15 it was adding Network employees to handle its installation and repair
16 problems, it is logical to look at the specific Network headcount data to find
17 them, which we did. Exhibit REP-6, Page 3, shows all of the above
18 headcount numbers as furnished by BellSouth.

19
20 I would urge you to read the two page letter written by the South Florida
21 Network Vice President on December 29, 1999, that states the following:
22 "To put the force question into perspective, you should understand that
23 South Florida added a negligible amount (less the 30 net) for baseline
24 service in 1999....Next year we are looking at a total reduction to the baseline
25 levels of 315 technicians due to various initiatives." (Exhibit REP-51).

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My testimony dealt with total Network employees and it was correct. For the record, the Commission might want to refer to Page 23 of Exhibit REP-6. This request is targeted to quantify the service technicians that are the key part of the Network organization in terms of installation and maintenance results. This response by the company shows the actual number of technicians for installation and maintenance in Florida at year end 1995 through 1999 as follows:

Year end 1995	4510
Year end 1996	4729
Year end 1997	4466
Year end 1998	4739
August 31, 1999	5187

Nancy Sims advised the Commission in 1998 that BellSouth was adding 192 network employees (Exhibit Lacher-No. 2, page 21) and Marshall Criser advised the company in 1999 it was adding 921 employees to Network and 842 employees to its business office operation (Lacher Exhibit No.2, page 27).

As to the company's failure to comply with the answertime rules, Mr. Lacher fails to challenge my testimony regarding BellSouth's pledge to add 842 business office employees in 1999. I am assuming that my statement is correct and that the company failed to add the number of service representatives to the force that they promised. This data also came directly

1 from BellSouth's response to our document requests.

2

3 We are still trying to figure out where all these employees might be located
4 today. This is not meant to reflect that Mr. Lacher's statement is incorrect,
5 but only to emphasize that the additional resources are not clearly
6 demonstrated by the discovery we have obtained and his employees
7 continue to complain about inadequate staffing as the reason why they are
8 violating the PSC rules.

9

10 On pages 20-21 of my direct testimony I stated that BellSouth would
11 probably produce documents to show that they did not reduce their work
12 force. I then stated that whatever they did in terms of organization,
13 expenses, overtime controls and operations, it was simply not enough.
14 That's the real point.

15

16 The argument in this docket is not the number of technicians the company
17 had on its headcount, or the company's criticism of the PSC's rules. This
18 docket is about the company's failure to meet its obligations to comply with
19 the Commission's service rules. As I stated in my direct testimony on pages
20 19 and 20, the company failed to have enough personnel on the job to install
21 new service and to repair existing services in compliance with the PSC rules.

22 The bottom line is that BellSouth is responsible. They chose not to comply.
23 The solution was within their control and that solution was to beef up its
24 service capabilities.

25 **Q. On pages 22 and 23 Mr. Lacher points out that in the small exchanges,**

1 **a single cable cut could result in a missed exchange for Commission**
2 **results. What is your response?**

3 A. Mr. Lacher is correct. The company could fail every exchange standard in
4 installation and repair in a given month by missing only 102 installations and
5 102 out of service repairs, providing that those misses were strategically
6 spread throughout all exchanges and the amount of the miss in each
7 exchange was only one repair or installation. Certainly, the magnitude of the
8 failures is relevant. However, BellSouth's statewide results as reflected in
9 my direct testimony are so far off target, discussions involving the fine points
10 of the process are meaningless. When literally thousands of customers fail
11 to receive satisfactory installation and repair service from the company
12 during a given month, and hundreds of thousands are unable to reach the
13 business office, then the Commission should take action. When these
14 failures take place on a continuing basis for over four years, then there is
15 clear evidence that the failures are not accidental, but willful.

16 **Q. On page 25 and 26 of his testimony, Mr. Lacher states the company has**
17 **not willfully violated the Commission's installation rule. What is your**
18 **response?**

19 A. Mr. Lacher states that there are two reasons for the misses. One of the
20 reasons is because of the small exchange problem. The other reason is
21 because the company has decided to give additional lines the same
22 appointments as new service. The real reason is that BellSouth has decided
23 to ignore the Commission's rules and replace them with its own priorities. If
24 second lines are causing BellSouth to be unable to meet its service
25 obligations that are clearly stated in the PSC rules, then it is BellSouth's

1 willful choice because it is aggressively promoting those sales in order to
2 increase revenues.

3
4 Mr. Lacher also fails to note that the company's installation process has
5 become increasingly automatic through the years and that the majority of its
6 service orders for new service are satisfied without the need for a premise
7 visit. (Exhibit REP-45) This factor should have guaranteed improved quality
8 of service, providing the company provided adequate staffing of its Florida
9 operations.

10 **Q. On page 29 of Mr. Lacher's testimony, he states that you are wrong in**
11 **your statement that because of price regulation, BellSouth chose to**
12 **ignore service. What is your response?**

13 **A.** What I stated in my testimony is that under price cap regulation the
14 Commission lacks the power to impact the earnings of the company when
15 a company fails to meet the rules of the PSC. I stated that the only method
16 the Commission can use today to ensure that the quality of service meets
17 the established minimum standards is to penalize the company for willful
18 violation of its rules in a proceeding such as this docket.

19
20 **Q. Mr. Lacher then states, "Mr. Poucher either does not understand the**
21 **competitive world or has chosen to ignore it." What is your response?**

22 **A.** My testimony deals with the monopoly telephone service provided by
23 BellSouth. BellSouth competition is overwhelmingly relegated to the
24 business market and BellSouth gives preference to those customers.
25 BellSouth's residential customers have historically accounted for 75-80% of

1 their access lines, and the overwhelming majority of its residential revenue
2 streams are not at great risk in the current market.

3
4 The BellSouth policy regarding price caps is to take every opportunity
5 available to increase its rates. BellSouth recently increased its rates for both
6 basic residence and business services at the first opportunity it was given
7 under the Florida statutes. I understand competition well enough to know
8 that BellSouth's pricing policies are more reflective of an unregulated
9 monopoly as opposed to that of a firm that is engaging in a vibrant,
10 competitive market.

11 **Q. Mr. Lacher states on page 32 of his testimony that "I am at a loss to**
12 **understand Mr. Poucher's horror at" the Vice President- Network**
13 **Operations plan to provide better service for business customers than**
14 **for residence customers. What is your response?**

15 **A.** I don't remember being horrified by this memo, but my concern is that when
16 more competitive markets are targeted for preferential installation and repair,
17 that the company should demonstrate its obligation to comply with the rules
18 that are in place for its non-competitive residential and rural customers. This
19 policy statement by the head of the Network organization in Florida highlights
20 one of the major regulatory dilemma's today--the absence of competition in
21 a price cap regulatory arena. How do regulators assure that excessive
22 profits from non-competitive markets are not used by incumbents to choke
23 out competition in the emerging competitive areas of the market?

24
25 I am still concerned that when BellSouth residential customers call early in

1 the day when their service is out of order that they will be placed in a long
2 line, while a business customer who calls later in the day will be placed at the
3 head of the line. If BellSouth is to be allowed to continue to enjoy its
4 substantial increases in earnings and revenues produced by price caps, then
5 the only way consumers can be protected is through vigilant enforcement of
6 the Commission's service standards. Ubiquitous competition will solve this
7 problem, but that's not even on the horizon.

8 **Q. On page 32 of his testimony, Mr. Lacher describes the company's**
9 **implementation of "94 days of Hell" in 1999. What is your response?**

10 A. Mr. Lacher states that BellSouth resources were stretched thin in 1999 due
11 to hurricanes and that "some staff person used this rather dramatic term for
12 our efforts." That unnamed staff person was Debra H. Teal, who stated, "IN
13 THE OFFICER'S MEETING ON SEPTEMBER 28TH, WE ADOPTED A
14 SLOGAN OF '94 DAYS OF HELL.'" (Exhibit REP-16, Page 1). I, therefore,
15 assumed that Ms. Teal was referring to the officers of BellSouth who
16 adopted the slogan and the goal of squeezing out another \$125 million in
17 profit from the Sept.-December 1999 budget. I found nothing sinister about
18 this dictate. What I did find was that at a time when BellSouth "resources
19 were stretched thin" and BellSouth needed all the help it could get, that it
20 chose to implement a hiring freeze and overtime restrictions. This freeze
21 was implemented immediately following BellSouth's assurances to the
22 Florida Commission that BellSouth was adding employees to meet its service
23 obligations. Now I ask you, if you had a big service problem and you
24 wanted to solve it, would you stop replacing your personnel losses and cut
25 your budget? The answer is absolutely not. However, if you wanted to

1 deliver more profits, even at the expense of good service, one of the ways
2 to do that is to stop replacing your personnel losses. That's what I think
3 BellSouth was doing. It's all about profits, because that was the priority.

4
5 The "94 Days of Hell" project, including its name, in my opinion, originated
6 from the top executive levels of BellSouth. The "94 Days of Hell War Room"
7 was managed by Elton King in BellSouth Headquarters, who had the power
8 to direct all BellSouth Network Vice Presidents to take specific actions to
9 achieve the desired results. (Exhibit REP-16, page 3) Please note Mr. King's
10 directive in his War Room Bulletin dated 9-29-99, in which he tells the
11 Network Vice Presidents, "There will be no forgiveness for weather impacting
12 conditions; all weather related overtime must be made up within the sector
13 during 4th quarter." (Exhibit REP-16, Page 3).

14 **Q. Did BellSouth budgetary restrictions result in worse service to**
15 **customers in 1999?**

16 **A.** The budgetary restrictions and the diversion of headcount to broadband
17 deployment in South Florida resulted in poorer service at a time when the
18 company was promising the Florida Commission that it was addressing the
19 service problem. The Performance Management report for Oscar J.
20 Primelles, General Manager-Network in South Florida for 1999 includes his
21 statement on page 2 that "it was extremely tough for us to meet our objective
22 level. Weather, as well as losses to IFITL and ADSL were main reasons that
23 had to be overcome." Actually, he didn't overcome his difficulties, because
24 he installed only 87% of his service orders in 3 days and repaired only 75%
25 of his service outages within 24 hours during all of 1999.

1 The 1999 performance review for John St. Amant, General Manager-
2 Network in Jacksonville also states "Overtime restrictions in August to
3 December have severely impacted these results." His supervisor's year end
4 comment was, "Force and overtime restrictions prevent positive impact."
5

6 Likewise, the performance of Billie C. Greenlief, General Manger-Network,
7 Indian River, suffered in the late 1999 when he averaged 77.4% for
8 installations in 3 days and his out of service restorations dropped to 73.4%
9 in September and 55.8% in October. Mr. Greenlief stated that the drop in
10 results was due to overtime controls and his supervisor commented,
11 "...overtime restrictions and hurricanes impacted results."
12

13 The 1999 performance review for Cindy White, Network Manager for North
14 Central operations, noted: "Steady improvement continued until
15 October....Recovery was impacted by the War Room directives on
16 headcount and overtime."
17

18 BellSouth had no control over the hurricanes, but it willfully placed budget
19 restrictions in place during "94 Days of Hell" that resulted in declining service.
20 The company imposed a hiring freeze and it diverted significant manpower
21 to the broadband project in South Florida that resulted in declining service
22 in Broward County. These acts were intentional, not accidental.

23 **Q. Mr. Lacher discusses the factors that have contributed to the**
24 **answertime misses between 1996 and 1998 from page 38 of his**
25 **testimony through page 46. What is your response?**

1 A. I don't find anything objectionable about this extensive part of his testimony
2 except that he failed to mention why BellSouth failed to meet the PSC
3 objectives, and that is because they did not have enough service
4 representatives on the payroll to meet the requirements of the rule.

5
6 On page 46 of his testimony, Mr. Lacher apparently shows the number of
7 service representatives on the payroll at year end 1996 was 2,312. The
8 company added 33 service reps in 1997, 303 in 1998 and 257 in 1999. In
9 three years, the company added 593 service reps according to Mr. Lacher's
10 data, which is significantly below 842 service reps it said it told the
11 Commission it was adding in 1999 alone.

12
13 During the four years at issue in this docket, the company has introduced
14 significant numbers of new regulated and unregulated services new
15 regulated services that are shown in Exhibit REP-46, which would have
16 significant impact on call holding times. The company has also entered the
17 wireless, broadband and Internet markets with an aggressive commitments
18 of capital and promotional expense, a process that almost certainly has a
19 major impact on holding times.

20 **Q. Given those factors mentioned by Mr. Lacher, as well as those factors**
21 **you have added, what is the proper number of service representatives**
22 **and repair center attendants required for BellSouth?**

23 A. I don't know, except that the company should have continued to add people
24 and authorize sufficient overtime needed to comply with the Commission's
25 rules. I've attempted to identify and understand the force and load factors

1 that are at work in BellSouth's business offices and repair centers. However,
2 this is BellSouth's problem, not the Commission's problem.

3
4 If the company's top priority was service and compliance with the PSC rules,
5 then the company would never have allowed its answertime performance to
6 be so dismal for such an extended period of time. It is my conclusion that
7 the Company has imposed its own judgement and priorities regarding the
8 level of service it will provide in Florida, and those priorities are inconsistent
9 with the Commission rules. Therefore, I believe answertime performance
10 will not improve for BellSouth until the Commission begins to enforce its
11 rules. It is not fair for the other telephone companies in Florida who are
12 meeting the Commission standards to allow BellSouth to continue to ignore
13 PSC rules in order to increase its profits.

14 **Q. On page 47, Mr. Lacher discusses the use of overtime in the Business**
15 **Office and Repair Centers. What is your response?**

16 A. I would simply observe that the company's performance in answertime during
17 1999 was dismal while it was cutting in half the amount of its overtime. This
18 was probably impacted by the "94 Days of Hell" that was imposed in 1999
19 when the company imposed a hiring freeze and overtime restrictions.

20 **Q. Mr. Lacher mentions the J.D. Power award on page 48 of his testimony.**
21 **What is your response?**

22 A. He failed to mention that the company dropped to fifth in 2000. However, the
23 J.D. Power award refers to BellSouth, not Florida. BellSouth has touted the
24 J.D. Power award for years when discussing its service, however, only 27%
25 of the Residential Local Telephone Service Satisfaction Study relates to

1 customer service. (Exhibit REP-47)

2 **Q. Mr. Lacher states that the company's answertime failures were**
3 **"absolutely not willful" on page 50 of his testimony. What is your**
4 **response.**

5 A. BellSouth is a large and powerful company. It has the resources to
6 accomplish whatever it chooses to accomplish. BellSouth has consistently
7 failed the PSC answertime rule for the past four years. It continued to fail to
8 meet the answertime rule in 2000. At what point in time does a failure move
9 from the accidental or unintentional stage to willful? How long do we need
10 to wait? My review of BellSouth's Florida operations indicates that budgetary
11 constraints imposed by BellSouth Headquarters were the primary cause of
12 the rule violations under consideration in this docket and I conclude that the
13 company's actions were willful.

14 **Q. Does this complete your testimony?**

15 A. Yes it does.

INDEX OF EXHIBITS
SURREBUTTAL TESTIMONY--R.E. POUCHER

DOCKET NO. 991378-TL

EXHIBIT NAME	EXH. NO.	
SOUTH FLORIDA BUSINESS PLAN	<u>REP-41</u>	_____
BELLSOUTH POTS REPAIR REGRESSION	<u>REP-42</u>	_____
EXCLUSIONS TO PSC REPORTS	<u>REP-43</u>	_____
IMPACT FROM USE OF FINAL STATUS TIME	<u>REP-44</u>	_____
INSTALLATION ORDERS FOR PRIMARY SERVICE COMPLETED W/O PREMISE VISITS	<u>REP-45</u>	_____
LIST OF NEW SERVICES	<u>REP-46</u>	_____
J.D. POWER AWARD	<u>REP-47</u>	_____
KEY FACTORS FOR CUSTOMER SATISFACTION	<u>REP-48</u>	_____
SPEED OF INSTALLATION AND REPAIR ARE MAJOR DRIVERS OF CUSTOMER SATISFACTION	<u>REP-49</u>	_____
SPEED AND REPRESENTATIVE EFFECTIVENESS HAVE THE MOST IMPACT OF CUSTOMER SATISFACTION	<u>REP-50</u>	_____
NEGIGIBLE 1999 FORCE ADDITIONS	<u>REP-51</u>	_____

Exhibit REP-41
Docket No. 991378-TL

SOUTH FLORIDA BUSINESS PLAN

ROA

We are counting on the KBAs and Selden Project to help us further maximize ROA. We continue to drive utilization levels to all time highs and, as a reminder, South Florida retains a higher ROA than any Operating area in BellSouth.

	YE 1998	1999 BUD	2000 BUD	%CHG Y/Y
ROA	27.4%	28.8%	TBD	TBD

EMPLOYEE SATISFACTION

During 1999 we communicated clearly at all levels of the business BST's Aspirations and South Florida's strategies. We developed Career Check and are in the midst of working with HR on various FLM initiatives. As a result, our 1999 survey showed excellent improvement, well over the 15% targets. In fact, South Florida enjoyed an 84% participation rate and posted some of the highest results in Network. On the first 3 questions, management results improved 52.3% (from 4.24 to 4.38) while the overall organizational improvement was 25.8% (3.59 to 3.95). Question 33 (on trust) made significant improvement as well, moving from 2.75 to 3.18. Looking at the survey as a whole, management scored 56 of the 60 questions at 4 or better while non-management scored 57 of 60 at 3 or better. Our Year 2000 strategies call for a continued emphasis on employee communication throughout the total organization as we enter the new millennium. We expect Year 2000 improvement targets again set at 15% over 1999 result

CUSTOMER SATISFACTION

Our objective for service provisioning/service assurance will address three key customer directives:

- Complete the work by the time promised
- Do it right the first time
- And do the work in a timely manner

We have partnered with the COU's and selected the MDP measurements that best illustrate our position in meeting customer satisfaction.

- % appointments met both provisioning/assurance
- % SOI and % repeat rate
- % service orders worked within 3 days
- % cleared within 24 hours

Exhibit REP-43
Docket No. 991378-TL

EXCLUSIONS TO PSC REPORTS

February 23, 1998

MEMORANDUM TO: Ted Kellermann

FROM: Wayne Tubaugh

SUBJECT: FPSC Rule Requirement Analysis

You requested a small group of subject matter experts analyze what impact, if any, would changes to our procedures regarding No Access(NA) and Out of Service (OOS) that would possibly improve our performance for Schedule 11 of the Florida Public Service Commission's FPSC) Quarterly Quality of Service Report. Mr. Jerry Pellegrini, Mr. Dick Collamati, Mr. Ken Szymczak, and I have researched the available information.

Concerning the information following, regarding the receipt to clear versus the receipt to final status, the information may be influenced either higher or lower depending on whether the technicians are using the cleared line of status.

Mr. Lacher asked about reports that are exempted from the FPSC report. Attached is a copy of the practice listing the exemptions, reports excluded from the FPSC report, approximately 29 cause codes are exempted. Additionally only network codes are reported to the FPSC, CPE and other type troubles are excluded.

Another question arose concerning about the percent cleared on troubles received before 3 p.m. on the Company's MDP Performance Report and the percent OOS cleared within 24 hours. It is my understanding there are no exclusion on the MDP report and it includes all reports, not just Network. In addition, it is also my understanding that reports received after 3 p.m. are not counted on any subsequent MDP report. Approximately 25-30 percent of the trouble reports are received after 3 p.m. These reports do count against the FPSC OOS cleared within 24 hours unless exempted and are just Network type reports.

Tubaugh/Kellermann
Service Page 2

In reviewing the receipt to clear versus the receipt to final status a note should be made that the information will be skewed if the technicians are in fact using the cleared line of status. This is a change made during the investigation of our trouble reporting process.

The report requested was to list by exchange all OOS troubles closed out between 24 hours 01 minutes and 24 hours 15 minutes and every quarter hour up to the 25 hours and 30 minutes. We agreed that if the final line of status is being used that a certain number of troubles closed out by station in the 24:01-24:45 were possibly not over 24 hours if the cleared line of status was used. The same scenario for cable was looked at but for the 24:01 to 25:15 was reviewed.

The result of counting the station troubles cleared within 24:45 and the cable within 25:15 along with all the Test Ok, Central Office-Fok In, and Fok out as cleared within 24 hours resulted in just three additional exchanges meeting the FPSC 95% requirement.

There are substantial numbers of Tok and Central office OOS troubles that are carried over the 24 hour objective and it would appear this needs to be investigated.

As you would expect station (code 3) and cable (code 4) are the main causes of the over 24 hour OOS misses.

We also reviewed the no access line status to determine if we stopped the clock until the customer was home and another dispatch was made about the impact that would have on assisting us in meeting the FPSC 95% objective. The analysis indicated that in one month 6 exchanges would have met the requirement, and in the other month 11 additional exchanges would have exceeded the Commission's objective.

There seems to be a high number of Network troubles closed out to no access and this may be another area of investigation.

Tubaugh/Kellermann
Service Page 3

I hope this is what you wanted us to review. If additional information is needed, lets identify the criteria and parameters that should be reviewed.

Should you have any questions, please contact me at (850) 224-5128.

Thanks,

Attachments

cc: Mr. Dick Collamati
Mr. Jerry Pellegrini
Mr. Kenneth Szymczak

1211 CPE No-Bill: Applies when trouble cannot be located in Telco facilities and is isolated to a customer telephone set or other customer provided equipment (fax, caller ID display, answering machine, PBX, etc.) and the isolation work is covered by the Inside Wire Maintenance Service Plan, the Trouble Isolation Plan (SBT states), a maintenance contract, or a warranty. No bill is to be rendered to the customer. Also applies when a customer declines dispatch when trouble is isolated to CPE. Effective August 1, 1997.

1212 Inside Wiring/Jack No-Bill: Applies when trouble cannot be located in Telco facilities and is isolated to customer provided wiring or jack, whether or not the trouble is corrected, and the work is covered by the Inside Wire Maintenance Service Plan, the Trouble Isolation Plan (SBT states), the Wire Maintenance plan (SBT states), a maintenance contract, or a warranty. No bill is to be rendered to the customer. Also applies when a customer declines dispatch after reporting that trouble originated in inside wiring or jack. Effective August 1, 1997.

1213 Trouble Determination ONLY - No Bill: Applies when the work required to determine that a trouble is located on the customer's side of the demarcation point is the only work performed and this work is covered by the Inside Wire Maintenance Service Plan, the Trouble Isolation Plan (SBT states), the Wire Maintenance Plan (SBT states), the Trouble Determination Plan (KY), a maintenance contract, or a warranty or is provided free of charge under tariff (basic lines in AL, LA, MS, & TN). No bill is to be rendered to the customer. Effective August 1, 1997.

1214 MTU Customer Declines Dispatch: Applies when MTU is present on line and the ver code indicates trouble on premise and customer declines dispatch. Generally used when the customer does not subscribe to a maintenance plan. This code is to be used by the Receipt Centers ONLY. Effective August 1, 1997.

24.5 Subcode 129* - Cable Television (CATV)

1290 CATV: Applies when trouble is isolated to or located in any equipment associated with CATV provided by BellSouth.

25. CAUSE OF REPORTS - CAUSE CODES - DEFINITIONS Sch 11

25.1 Six codes are provided for categorizing trouble reports according to cause. The term "Cause Code" consists of three numerics and will be used as follows:

The first identifies the general Cause.

The second and third identify the Subcode associated with the applicable Cause Code.

25.2 A 3-Digit Cause Code Shall Be Assigned On All Trouble Reports. If more than one code could apply, assign the code which would have had the greatest impact on the cause of the trouble. Cause Codes apply to all classes of service. An asterisk (*) is shown with some codes to indicate a digit is required. The Cause Codes are defined in the following paragraphs.

26. CAUSE CODE 1** - TELEPHONE COMPANY EMPLOYEE

100 Telco Employee: Applies when trouble was caused by a Bell Telephone Company employee or overlooked by an employee on a previous visit such as pair reversed, loose connection, full money box, etc. This does not include troubles caused by a BellSouth Utility Employee (see cause code 110)

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110 BellSouth Utility Employee: Applies when the trouble was caused by a BellSouth Utility Employee, (i.e., Utility Worker or Machine Operator) who causes damage to telephone plant or facilities while excavating or placing buried wire or cable, or when performing other activities that cause damage to telephone plant or facilities. This does not include Master Contractors.

27. CAUSE CODE 2 - NON-EMPLOYEE**

200 Non-Employee: Applies when the trouble is caused by person/persons that are not employed directly by BellSouth company. When using this code, a damage report will be prepared for use by the Claims organization.

210 Customer Action: Applies when a trouble report or service condition was caused by a customer's actions. This would include troubles caused by a vendor, lost or forgotten password, error or misuse of equipment or facilities.

220 Other Utility: Applies when a trouble report or service condition is caused by a public utility company other than the BellSouth Company, i.e., gas, electric, CATV, sewer, water, independent telephone company, and department of transportation (DOT). This would include any contractor used by the utility.

NOTE: This cause code does not apply for a foreign worker that is not affiliated with one of the utilities. (See cause code 222.)

222 Foreign Worker: Applies when a trouble report or service condition is caused by a worker or an individual not performing work with or for the BellSouth company or other utility, i.e., pool company, fence company, or private party.

230 Motor Vehicle: Applies when a trouble report or service condition was due to a motor vehicle accident

270 Telco Master Contractor: Applies when the cause of the trouble can be directly attributed to a company under contract by the Telephone Company.

280 Petroleum/Chemical: Applies when a trouble report or service condition is caused by petroleum, a petroleum by-product (gasoline), or a chemical.

28. CAUSE CODE 3 - BST PLANT OR EQUIPMENT**

300 Plant Or Equipment: Applies when trouble was caused by the overload, failure or breakdown of plant or equipment, which is independent of any direct human action, i.e., dirt, wear, corrosion, equipment out of adjustment, etc. Use this code when detail coding is not desired.

310 Overload: Applies when the trouble condition is caused by an excessive quantity or demand placed on the operating resources of a system.

320 Cable Sheath Failure: Applies when the trouble condition is caused by a cable facility sheath problem, cable support hardware, etc.

330 MemoryCall Delayed Messages: Applies when the cause of the report was associated with delayed messages.

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331 SMDI Link Failure – Regulated: Applies when the trouble condition is caused by a SMDI Link facility problem or 829 data set problem on either end.

332 SMDI Link Failure – Regulated: Applies when the trouble condition is caused by a SMDI Link problem in the C.O. side; 202 modem to the I/O port.

340 DATAKIT Failure: Applies when the trouble condition is caused by a DATAKIT failure.

29. CAUSE CODE 4** – WEATHER

400 Weather: Applies when the cause of trouble condition can be directly attributed to weather conditions. Use this code when detail coding is not desired.

410 Lightning: Applies when the cause of trouble condition can be directly attributed to lightning.

420 Moisture: Applies when the trouble condition is caused by rain, dew humidity, condensation, etc.

430 Flood: Applies when the trouble condition is caused by an overwhelming quantity, volume, or accumulation of water that is considered a flood.

440 Wind: Applies when the trouble condition is caused by a natural movement of air of any velocity less than 75 miles per hour.

450 Hurricane/Tornado: Applies when a violent or destructive storm or system of winds greater than 75 miles per hour that may be accompanied by abundant rain is determined to be the cause of a trouble condition.

460 Ice/Sleet/Snow: Applies when the trouble condition was caused by water vapor that is frozen or partly frozen into sheets, crystals, or hail.

470 Temperature: Applies when trouble can be attributed to extremes in outside temperatures which affect the performance of plant or equipment.

30. CAUSE CODE 5** – MISCELLANEOUS/SERVICE ORDER ACTIVITY

500 Miscellaneous: Applies when the cause of the trouble report is attributed to fire, insects, rodent/reptiles, birds, trees/foliage, power, etc. This code also applies when the cause of the trouble condition is not included in Cause Codes 1** through 4**. Use this code when detail coding is not desired.

501 Inductive Interference Radio: Applies when a noisy condition is caused by the local radio stations, HAM operator stations, CB operators, etc. This code does not apply if a cable defect causes the noisy condition.

502 Inductive Interference Commercial Power: Applies when a noisy condition is caused by the local power company, i.e., load balance problem. This code does not apply if a cable defect causes the noisy condition.

503 Customer Action Not Billed: Applies when the cause of the trouble is due to a customer's action but the technician elects not to bill.

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504 Theft: Applies when a trouble report is due to theft.

505 Vandalism: Applies when a trouble report is due to vandalism.

506 Trouble Analysis Facilitation Interface (TAFI) mechanized system use only: Applies when a trouble report is handled through completion by the TAFI system. This code applies only when the report is closed to a central office translation disposition code, 0520 through 0529. This code is assigned by TAFI and should not be input manually except during TAFI/LMOS failures.

*This
Needs to
be reviewed*

510 Service Order Activity: Applies when closing out completed Service Order Activity. Use this code with Disposition Code 0190.

511 CO/RCMAC/Frame: Applies when closing out Service Order Activity where all field work is complete, no re-visit is required and only frame/translations work remains to be done for the provision of service. Use this code with Disposition Code 0190.

512 No Access: Applies when a Service Order is incomplete due to a No Access condition to the customer's premise, serving terminal, network interface, etc. Use this code only for No Access situations. Use this code with Disposition Code 0191.

513 Buried Service Wire: Applies when a Service Order is incomplete and no service is provided due to a BSW not being placed. Use this code with Disposition Code 0191.

514 Held for Facilities (PF/CF): Applies when a Service Order is incomplete due to no F1 and/or F2 facilities. This code should not be used when order is incomplete due to BSW condition. Use this code with Disposition code 0191.

515 Subscriber Later (SL) or Subscriber Request (SR): Applies when a Service Order is incomplete due to a customer request to change the Due Date. Use this code with Disposition Code 0191.

516 Subscriber Other (SO): Applies when a Service Order is incomplete due to a customer cancellation of the order, customer had to leave premise, better directions, etc. Use this code with Disposition Code 0191.

517 Unnecessary Dispatch: Applies when a Service Order did not require a field visit due to existing CT, no field work required, etc. Use this code with Disposition Code 0190 or 0191.

520 Mechanized System (K2VMS): Applies when the trouble condition is caused by or attributed to problems with the K2VMS.

521 COMVERSE Platform: Applies when the trouble condition is caused by a defective card, disk failure, VPU failure, etc.

522 BTI Platform: Applies when the trouble condition is caused by a defective card, disk failure, VPU failure, etc.

523 OCTEL Platform: Applies when the trouble condition is caused by a defective card, disk failure, VPU failure, etc.

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524 MemoryCall Paging Problems: Applies when a trouble report is due to paging capabilities (digital, voice, or tone) within the MemoryCall system.

525 SMDI Link Failure - Unregulated: Applies when the trouble condition is caused by problems in the link between the 202T modem to the Voice Mail Platform, i.e. 202T modems, cords, cables, etc.

31. CAUSE CODE 6 - UNKNOWN/ROUTINE**

600 Unknown: Applies when the cause of trouble condition cannot be determined. Use this code when detail coding is not desired.

610 Came Clear: Applies when a trouble is isolated to facilities or equipment and comes clear prior to being repaired.

699 Routine Work: Applies to employee originated reports only. Do not use this code with customer direct reports.

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Exhibit REP-44
Docket No. 991378-TL

IMPACT FROM USE OF FINAL STATUS TIME

April Ivy /FL,MIAM02 7/15/97 15:12

Page 1

REPLY

Dated: 7/15/97 at 15:22

Subject: Mr. Lacher's request for information on FPSC rule object... Contents: 7
Sender: Gary Hall /AL,BRHM03

Item 1

TO: Wayne Tubaugh /FL,MIAM04 { Undisplayable address parts }
CC: Laura D. Dinan /AL,BRHM09 { Undisplayable address parts }
Gary D. Hall /AL,BRHM03 { Undisplayable address parts }
April Ivy /FL,MIAM02 { Undisplayable address parts }
Jerry W. Moore /FL,MIAM01 { Undisplayable address parts }
Jerry M. Pellegrini /FL,MIAM01
Paul A. Pitts /AL,BRHM09 { Undisplayable address parts }

Item 2

=>Gary attached is the memo that you requested to do the review for the FPSC rule
=>objectives.

=>

=>Tubaugh

=>

In response to your memo of 06/17/97 regarding FPSC Objectives:

Attached are spreadsheets for May and June 1997 that closely replicate the Schedule 11 using DB2, rather than changing the actual code for the schedule 11. The only difference is that the actual Schedule 11 is slightly better on OOS<24 hours due to Sunday and Holiday hours removed. All other columns of the Schedule 11 were exact...This model will allow us to predict the impact of various requested items.

Referring to your memo:

1. We are not able to breakout CCA and CNA (not passed to MTAS)
2. Overall impact of CLR vs FST on attachment sch11.doc.....
3. TAFI does record FDRs. It does have RABSDO (Refused same day), but the impact on the OOS<24 is not significant (less than 1/10%).
4. No Access info on attachment sch11.doc...
5. Information by Exchange on each change as well as combined impact are shown on attachments maysch11.xls and junsch11.xls.....

Bottom line: If we changed both FST to CLR and counted NA <24 hours as made, the percentage for May would improve by about 3.10 percent and June would improve by 2.49 percent. The number of Exchanges meeting the objective for May would go from 12 to 25 and June would improve from 7 to 13. Look at the attachments for individual impacts.

Jerry Pellegrini and Laura Dinan provided the methodology and data for me on the attachments...I hope that this information meets your needs.

Gary

Item 3

Gary attached is the memo that you requested to do the review for the FPSC rule objectives.

Tubaugh

Item 4

June 17, 1997

MEMORANDUM TO: Gary Hall

FROM: Wayne Tubaugh

SUBJECT: Mr. Lacher Request to Review FPSC Objectives

Docket No. 990362-TL
Exhibit REP-44
Page 2

In our meeting and telephone conversation on June 16, 1997, I indicated to you that I would provide a memo requesting information regarding MTAS/LMOS and how it impacts the FPSC service rule objectives. We discussed four items, however, the first item has already been changed. Following is a list of the other three items:

1. Provide the % of troubles that the intermediate status of CCA (Cleared Customer Advised) is used.
2. Provide a comparative study of the number of and % of troubles:
 1. Receipt to CCA
 2. Receipt to FST
3. Provide any analysis that will assist reviewing Future Date Request, i.e. % of total, fid used, how it can be modified, etc.
4. The total and % of OOS troubles that are not accessed within 24 hours of the receipt of the trouble.

Should you have any questions concerning this matter, please contact me at (904) 933-0566 (mobile) or (904) 224-5128 (Office)

Thanks

cc: Ivy
Moore

Item 5

Schedule 11 Analysis of May and June 1997

MTAS/DB2	MAY 97	JUNE 97
Standard Receipt to Final Status <24 hrs. # Exchanges meeting 95.00%	89.80% 12	85.14% 7
Proposed Receipt to Clear <24 hrs. # Exchanges meeting 95.00%	90.95% 15	86.39% 7

Adding in additional no access < 24hrs yet overall time exceeded 24 hrs Standard Receipt to Final Status measure # Exchanges meeting 95.00%	91.75% 18	87.63% 10
--	--------------	--------------

Adding in additional no access <24hrs yet overall time exceeded 24 hrs Proposed Receipt to Clear measure # Exchanges meeting 95.00%	92.90% 25	88.88% 13
--	--------------	--------------

Average Receipt to Final Status	14.47 hrs	16.16 hrs
Average Receipt to Clear	12.36 hrs	14.25 hrs

Out-of-Service troubles No-Accessed <24 hrs with durations exceeding 24Hrs		
Total	1000	1268
Percent of oos base sch 11	1.96%	2.49%

Item 6

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Item 7

This item is of type MS EXCEL SPREADSHEET and cannot be displayed as TEXT

MAY 1997		ANALYSIS USING STANDARD RECEIPT TO FINAL STATUS						ANALYSIS USING PROPOSED RECEIPT TO CLEAR				
(A)	(B)	(C)	(D)	(E)	(F)	X	(G)	(H)	(I)	(J)	(K)	
			NO			X			NO			
			ACCESS			X			ACCESS			
	OOS	REC-FST	<24 HRS	NEW	NEW	X	REC-CLR	<24 HRS	NEW	NEW		
	BASE	<24 HRS	%	REC-FST	ADJ TOT	%	X	<24 HRS	%	REC-FST	ADJ TOT	%
EXCHANGES			>24 HRS	<24 HRS	<24 HRS	X		>24 HRS	<24 HRS	<24 HRS		
JACKSONVILLE	3559	2957	83.09%	44	3001	84.32%	X	2993	84.10%	44	3037	85.33%
FERNANDINA BCH	126	115	91.27%				X	116	92.06%			
FT. GEORGE	12	11	91.67%				X	11	91.67%			
YULE	41	36	87.80%	2	38	92.68%	X	36	87.80%	2	38	92.68%
JACKSONVILLE BCH	245	209	85.31%	9	218	88.98%	X	210	85.71%	9	219	89.39%
PONTE VEDRA	133	111	83.46%	1	112	84.21%	X	111	83.46%	1	112	84.21%
BALDWIN	17	17	100.00%				X	17	100.00%			
GREEN COVE SPGS	54	42	77.78%				X	43	79.63%			
MAXVILLE	24	23	95.83%				X	23	95.83%			
MIDDLEBURG	115	95	82.61%	1	96	83.48%	X	96	83.48%	1	97	84.35%
ORANGE PARK	279	245	87.81%	2	247	88.53%	X	248	88.89%	2	250	89.61%
PALATKA	130	116	89.23%	1	117	90.00%	X	116	89.23%	1	117	90.00%
POMONA PARK	26	17	65.38%				X	21	80.77%			
WELAKA	10	7	70.00%	1	8	80.00%	X	7	70.00%	1	8	80.00%
JULINGTON	40	32	80.00%				X	32	80.00%			
ST. AUGUSTINE	354	301	85.03%	2	303	85.59%	X	305	86.16%	2	307	86.72%
BUNNELL	55	46	83.64%				X	46	83.64%			
DAYTONA	782	634	81.07%	10	644	82.35%	X	641	81.97%	10	651	83.25%
DELEON SPGS	12	8	66.67%				X	8	66.67%			
DELAND	168	129	76.79%	2	131	77.98%	X	132	78.57%	2	134	79.76%
FLAGLER BCH	58	40	68.97%	2	42	72.41%	X	40	68.97%	2	42	72.41%
NEW SMYRNA BCH	419	330	78.76%	6	336	80.19%	X	331	79.00%	6	337	80.43%
OAK HILL	21	17	80.95%	1	18	85.71%	X	17	80.95%	1	18	85.71%
PALM COAST	144	121	84.03%	1	122	84.72%	X	123	85.42%	1	124	86.11%
PIERSON	17	10	58.82%	1	11	64.71%	X	11	64.71%	1		
COCOA BCH	108	96	88.89%	2	98	90.74%	X	99	91.67%	2		
MAY 1997			ANALYSIS USING STANDARD RECEIPT TO FINAL STATUS					ANALYSIS USING PROPOSED RECEIPT TO CLEAR				

	(A)	(B)	(C)	(D)	(E)	(F)	X	(G)	(H)	(I)	(J)	(K)
				NO						NO		
	OOS	REC-FST		ACCESS						ACCESS		
EXCHANGES	BASE	<24 HRS	%	<24 HRS	NEW	NEW	X	REC-CLR		<24 HRS	NEW	NEW
				REC-FST	ADJ TOT	%	X	<24 HRS	%	REC-FST	ADJ TOT	%
				>24 HRS	<24 HRS	<24 HRS	X			>24 HRS	<24 HRS	<24 HRS
COCOA	568	493	86.80%				X					
TITUSVILLE	245	218	88.98%	4	497	87.50%	X	496	87.32%	4	500	88.03%
EAU GALLIE	385	344	89.35%	2	220	89.80%	X	220	89.80%	2	222	90.61%
MELBOURNE	807	736	91.20%	2	346	89.87%	X	348	90.39%	2		
KEYSTONE HGHTS	47	41	87.23%	5	741	91.82%	X	749	92.81%	2		
LAKE CITY	208	193	92.79%				X	42	89.36%	5	754	93.43%
MICANOPY	21	20	95.24%	1	194	93.27%	X	195	93.75%			
NEWBERRY	38	33	86.84%				X	20	95.24%	1	196	94.23%
OLDTOWN	29	22	75.86%				X	34	89.47%			
TRENTON	38	36	94.74%				X	22	75.86%			
DEBARY	128	118	92.19%				X	36	94.74%			
EAST ORANGE	44	37	84.09%				X	118	92.19%			
GENEVA	27	25	92.59%				X	38	86.36%			
ORLANDO	2795	2529	90.48%				X	25	92.59%			
WEEKIWACHEE SPGS	242	197	81.40%	80	2609	93.35%	X	2589	92.63%	80	2669	95.49%
YANKEETOWN	7	6	85.71%				X	199	82.23%			
ARCHER	20	15	75.00%				X	6	85.71%			
BRONSON	31	26	83.87%				X	15	75.00%			
CHIEFLAND	36	28	77.78%	2	28	90.32%	X	26	83.87%	2	28	90.32%
CEDAR KEYS	4	3	75.00%				X	29	80.56%			
CROSS CITY	29	25	86.21%	1	4	100.00%	X	4	100.00%			
GAINESVILLE	577	493	85.44%	1	26	89.66%	X	25	86.21%	1		
HAWTHORNE	18	12	66.67%	16	509	88.21%	X	500	86.66%	16	26	89.66%
OVIEDO	147	133	90.48%				X	17	94.44%		516	89.43%
SANFORD	472	436	92.37%	6	139	94.56%	X	133	90.48%	6	139	94.56%
BROOKSVILLE	144	119	82.64%	9	445	94.28%	X	444	94.07%	9	453	95.97%
MAY 1997				3	122	84.72%	X	120	83.33%	3	123	85.42%
	ANALYSIS USING STANDARD RECEIPT TO FINAL STATUS											
	ANALYSIS USING PROPOSED RECEIPT TO CLEAR											
	(A)	(B)	(C)	(D)	(E)	(F)	X	(G)	(H)	(I)	(J)	(K)

	OOS BASE	REC-FST <24 HRS	%	NO ACCESS			X	REC-CLR <24 HRS	%	NO ACCESS		
				<24 HRS	NEW ADJ TOT	NEW %>				<24 HRS	NEW ADJ TOT	NEW %>
EXCHANGES				>24 HRS	<24 HRS	<24 HRS	X			>24 HRS	<24 HRS	<24 HRS
DUNNELLON	55	49	89.09%				X					
CHIPLEY	68	46	67.65%				X	49	89.09%			
GRACEVILLE	30	20	66.67%				X	46	67.65%			
HAVANA	62	42	67.74%				X	20	66.67%			
LYNN HAVEN	75	61	81.33%	1	43	69.35%	X	43	69.35%	1	44	70.97%
PANAMA CITY	322	255	79.19%				X	61	81.33%			
PANAMA CITY BCH	165	132	80.00%	3	258	80.12%	X	257	79.81%	3	260	80.75%
SUNNY HILLS	22	15	68.18%	2	134	81.21%	X	132	80.00%	2	134	81.21%
VERNON	22	14	63.64%	1	16	72.73%	X	15	68.18%	1	16	72.73%
YOUNGSTOWN FTN	37	24	64.86%				X	14	63.64%			
CANTONMENT	113	79	69.91%	7	86	76.11%	X	24	64.86%			
GULF BREEZE	166	113	68.07%	1	114	68.67%	X	80	70.80%	7	87	76.99%
HOLLY NAVARRE	80	55	68.75%	1	56	70.00%	X	113	68.07%	1	114	68.67%
JAY	71	46	64.79%				X	56	70.00%	1	57	71.25%
MILTON	286	186	65.03%	1	187	65.38%	X	46	64.79%			
MUNSON	21	14	66.67%	1	15	71.43%	X	188	65.73%	1	189	66.08%
PACE	172	117	68.02%	2	119	69.19%	X	14	66.67%	1	15	71.43%
PENSACOLA	1298	981	75.58%	11	992	76.43%	X	118	68.60%	2	120	69.77%
FT. PIERCE	367	319	86.92%	5	324	88.28%	X	1009	77.73%	11	1020	78.58%
PORT ST. LUCIE N	159	152	95.60%	3	155	97.48%	X	337	91.83%	5	342	93.19%
PORT ST LUCIE S	58	54	93.10%	1	55	94.83%	X	154	96.86%	3	157	98.74%
SEBASTIAN	81	73	90.12%				X	54	93.10%	1	55	94.83%
VERO BCH	266	234	87.97%	2	236	88.72%	X	73	90.12%			
WEST PALM BCH	2645	2464	93.16%	50	2514	95.05%	X	238	89.47%	2	240	90.23%
HOBE SOUND	39	36	92.31%				X	2488	94.06%	50	2538	95.95%
JENSEN BCH	53	52	98.11%				X	38	97.44%			
MAY 1997							X	52	98.11%			
		ANALYSIS USING STANDARD RECEIPT TO FINAL STATUS						ANALYSIS USING PROPOSED RECEIPT TO CLEAR				
	(A)	(B)	(C)	(D)	(E)	(F)	X	(G)	(H)	(I)	(J)	(K)
				NO			X		NO			

	OOS	REC-FST		ACCESS			X			ACCESS		
	BASE	<24 HRS	%	<24 HRS	NEW	NEW	X	REC-CLR	%	<24 HRS	NEW	NEW
EXCHANGES				REC-FST	ADJ TOT	%	X	<24 HRS	%	REC-FST	ADJ TOT	%
				>24 HRS	<24 HRS	<24 HRS	X			>24 HRS	<24 HRS	<24 HRS
JUPITER	283	269	95.05%	8	277	97.88%	X	271	95.76%	8	279	98.59%
STUART	404	380	94.06%	3	383	94.80%	X	383	94.80%	3	386	95.54%
CORAL SPGS	438	379	86.53%	10	389	88.81%	X	384	87.67%	10	394	89.95%
DEERFIELD	359	332	92.48%	4	336	93.59%	X	332	92.48%	4	336	93.59%
POMPANO	1262	1165	92.31%	25	1190	94.29%	X	1173	92.95%	25	1198	94.93%
BOCA RATON	1244	1140	91.64%	22	1162	93.41%	X	1175	94.45%	22	1197	96.22%
BOYNTON BCH	407	386	94.84%	9	395	97.05%	X	392	96.31%	9	401	98.53%
DELRAY BCH	498	457	91.77%	8	465	93.37%	X	463	92.97%	8	471	94.58%
FT. LAUDERDALE	3252	2934	90.22%	77	3011	92.59%	X	2969	91.30%	77	3046	93.67%
HOLLYWOOD	2509	2338	93.18%	35	2373	94.58%	X	2355	93.86%	35	2390	95.26%
BELLE GLADE	103	98	95.15%	3	101	98.06%	X	99	96.12%	3	102	99.03%
PAHOKEE	24	22	91.67%				X	22	91.67%			
MIAMI	16687	15653	93.80%	379	16032	96.07%	X	15806	94.72%	379	16185	96.99%
NORTH DADE	1466	1317	89.84%	73	1390	94.82%	X	1360	92.77%	73	1433	97.75%
HOMESTEAD	765	704	92.03%	21	725	94.77%	X	707	92.42%	21	728	95.16%
BIG PINE KEY	27	26	96.30%	1	27	100.00%	X	26	96.30%	1	27	100.00%
HOMESTEAD	282	264	93.62%	8	272	96.45%	X	267	94.68%	8	275	97.52%
ISLAMORADA	21	21	100.00%				X	21	100.00%			
KEY LARGO	75	68	90.67%				X	70	93.33%			
KEY WEST	165	155	93.94%	2	157	95.15%	X	156	94.55%	2	158	95.76%
MARATHON	38	38	100.00%				X	38	100.00%			
NORTH KEY LARGO	11	11	100.00%				X	11	100.00%			
SUGARLOAF KEY	19	19	100.00%				X	19	100.00%			
NON-SO BELL	4	2	50.00%				X	2	50.00%			
MAY 1997				ANALYSIS USING STANDARD					ANALYSIS USING PROPOSED			
				RECEIPT TO FINAL STATUS					RECEIPT TO CLEAR			
	(A)	(B)	(C)	(D)	(E)	(F)	X	(G)	(H)	(I)	(J)	(K)

				NO			X			NO		
				ACCESS			X			ACCESS		
	OOS	REC-FST		<24 HRS	NEW	NEW	X	REC-CLR		<24 HRS	NEW	NEW
	BASE	<24 HRS	%	REC-FST	ADJ TOT	%	X	<24 HRS	%	REC-FST	ADJ TOT	%
EXCHANGES				>24 HRS	<24 HRS	<24 HRS	X			>24 HRS	<24 HRS	<24 HRS
							X					
							X					
							X					
FLORIDA	51132	45914	89.80%	1000	46914	91.75%	X	46503	90.95%	1000	47503	92.90%
							X					
							X					
EXCHANGES MEETING							X					
RULE			12				X		15			
							X					
ADD'L EXCHANGES							X					
MEETING RULE							X					
ADJUSTED FOR							X					
NO ACCESSES							X					
WITHIN 24 HOURS						+6 = 18	X				+ 11 = 26	

Schedule 11 Analysis of May and June 1997

MTAS/DB2

	MAY 97	JUNE
97		
Standard Receipt to Final Status <24 hrs. # Exchanges meeting 95.00%	89.80% 12	85.14% 7
Proposed Receipt to Clear <24 hrs. # Exchanges meeting 95.00%	90.95% 15	86.39% 7
<u>Adding</u> in additional no access < 24hrs yet overall time exceeded 24 hrs Standard Receipt to Final Status measure # Exchanges meeting 95.00%	91.75% 18	87.63% 10
<u>Adding</u> in additional no access <24hrs yet overall time exceeded 24 hrs Proposed Receipt to Clear measure # Exchanges meeting 95.00%	92.90% 25	88.88% 13
Average Receipt to Final Status hrs	14.47 hrs	16.16
Average Receipt to Clear hrs	12.36 hrs	14.25
Out-of_Service troubles No-Accessed <24 hrs with durations exceeding 24Hrs		
Total	1000	1268

Percent of oos base sch 11

1.96%

2.49%

Exhibit REP-45
Docket No. 991378-TL

**INSTALLATION ORDERS FOR PRIMARY SERVICE
COMPLETED W/O PREMISE VISITS**

26

David C. Gossman /m2,mail2a 6/27/00 7:23

Page 1

MESSAGE

Dated: 6/26/00 at 14:30

Subject: SOFTER REPORT

Contents: 3

Creator: byyhcmc /Internet (byyhcmc@bos27148.al.bst.bls.com)

Item 1

FROM: byyhcmc /Internet (byyhcmc@bos27148.al.bst.bls.com)

TO: Paul Otradovec /m2,mail2a

Item 2

ARPA MESSAGE HEADER

Item 3

TOTAL SERVICE ORDER FLOW THROUGH SUMMARY
 NETWORK HIERARCHY

DOMAIN = Florida

1999

SOFTER VERS. = 3.0
 Report Month = YTD
 Run Date = 01-07-00

ORDER ACTIVITY	# ORDERS	ISS % FT	ASGN % FT	FRM % FT	FAC % FT	TRN % FT	COM % FT	NO TRBL	TOTAL % FT
0 - 2 LINES	1333048	85.6	78.8	74.9	60.0	90.9	96.0	91.4	35.5
3 - 6 LINES	24904	44.5	60.3	52.2	9.9	68.1	89.1	83.5	1.7
7 - 12 LINES	4851	35.6	46.6	44.9	9.0	55.8	85.4	83.6	1.3
13 - 19 LINES	1223	31.1	34.3	36.1	9.2	43.4	84.5	84.3	0.8
20 + LINES	731	23.5	31.1	33.6	8.2	32.6	79.1	87.8	0.3
INWARD ORDERS	1364757	84.6	78.3	74.3	58.8	90.3	95.8	91.2	34.7
DENIAL/RESTORAL	2529406	99.5	100.0	100.0	100.0	99.7	100.0	100.0	99.2
FEATURES ONLY	2910543	95.7	99.9	100.0	99.7	98.6	99.9	96.5	91.3
OTHER CHANGE ORDERS	1131677	93.5	96.4	97.8	99.1	95.9	99.8	95.3	83.8
OUTWARD ORDERS	1203595	95.3	94.2	94.7	98.9	96.1	99.9	96.5	81.9
TOTAL ORDERS	9139978	94.7	95.5	95.2	93.5	97.0	99.3	96.5	82.9

Caution should be used when charting error center responsibility
 if the user is unfamiliar with SOFTER decision making rules

NOTICE:
 NOT FOR USE OR DISCLOSURE OUTSIDE
 BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT

VP OPERATIONS; SOUTH
 STATE: FLORIDA
 AREA: NOFLA
 DISTRICT:
 SUB-DISTRICT:
 WIRE CENTER: CODE SET: C

SERVICE ORDER AND VISIT ACTIVITY REPORT
 BELLSOUTH TELECOMMUNICATIONS

PROGRAM: RP28B96
 RUN DATE: 01/05/00
 SITE: NORTH FLORIDA
 MONTH ENDING: 12/ 1999
 PAGE: 3

INWARD SERVICE ORDER ACTIVITY	RESIDENCE			BUSINESS			TOTAL					
	N	T	C	TOT	N	T	C	TOT	N	T	C	TOT
1. TOTAL SO (N,T,C)	38588	15882	285	54855	5152	1357	1742	6231	41852	17219	1945	68616
A. REINSTALLS (RI)	24464	11198	8	35662	1293	518	1740	3543	25757	11708	1740	39205
B. NEW INSTALLS (NI)	3861	2581	0	5642	438	261	0	699	3499	2842	0	6341
C. ADDIT. LINES (ADL)	18975	2103	293	13281	1421	566	0	1989	12396	2669	205	15270
2. TOT SO W/O A VISIT	23581	10378	47	33998	1146	363	184	1613	24727	10753	151	35611
%	61.2	65.3	23.2	62.3	36.4	27.2	6.0	25.9	59.4	62.3	7.8	58.6
3. TOT SO W/O A FAC VISIT	23898	10372	47	34017	1146	364	188	1619	24747	10756	155	35638
%	61.3	65.3	23.2	62.3	36.5	27.2	6.1	26.0	59.4	62.3	7.9	58.6
4. TOT SO W/O A VISIT (RI)	11491	9848	0	11598	754	199	104	1057	22451	10097	104	32652
%	30.7	68.4	0.0	38.4	38.5	39.6	8.0	29.8	67.2	36.2	0.0	35.3
A. W/O A FAC VISIT (RI)	2171	9917	0	31634	757	282	113	1072	22474	10119	113	32706
%	88.8	88.6	0.0	88.7	58.5	39.6	6.5	38.3	87.3	86.4	6.5	83.4
5. TOT SO W/O A VISIT (NI)	399	258	0	649	11	27	0	68	482	285	0	737
%	12.8	18.0	0.0	11.5	13.9	10.3	0.0	12.6	12.9	18.0	0.0	11.6
A. W/O A FAC VISIT (NI)	399	262	0	661	64	27	0	91	463	289	0	752
%	13.0	18.2	0.0	11.7	14.6	18.3	0.0	13.8	13.2	18.2	0.0	11.9
6. TOT SO W/ VISITS	14919	5512	156	20587	2866	974	1638	4618	16925	6486	1794	25205
%	38.8	34.7	76.8	37.7	63.6	72.8	94.0	74.1	40.6	37.7	92.2	41.4
A. PREMISES VISITS	17	2	0	19	3	1	2	6	20	5	2	25
%	0.1	0.0	0.0	0.1	0.1	0.1	0.3	0.1	0.1	0.0	0.1	0.1
B. FACILITY VISITS	8699	3928	72	12699	1183	612	952	2747	9882	4540	1024	15446
%	58.3	71.3	46.2	61.7	59.8	62.8	58.1	59.5	58.4	70.0	57.1	61.3
C. PREM B FAC VISITS	4564	1819	57	5642	654	257	588	1411	5220	1276	557	7053
%	30.6	18.5	36.5	27.4	32.6	26.4	38.5	30.6	30.8	19.7	31.0	28.0
D. MISCODED ORDERS	698	198	14	901	79	48	78	195	778	236	98	1098
%	4.6	3.6	9.8	4.4	3.9	4.1	4.6	4.2	4.5	3.6	5.0	4.3
E. UNNECESSARY DISP	946	367	13	1326	87	64	188	259	1033	431	121	1585
%	6.3	6.7	8.3	6.4	4.3	6.6	6.6	5.6	6.1	6.6	6.7	6.3
7. TOT SO W/ VISITS (RI)	2767	1388	0	4867	539	311	1636	2486	3386	1611	1636	6553
%	18.5	23.6	0.0	19.8	26.9	31.9	99.9	53.8	19.5	24.8	91.2	26.0
A. PREMISES VISITS (RI)	26	19	0	59	3	5	9	15	23	22	9	54
%	0.7	1.5	0.0	1.0	0.6	1.0	0.6	0.7	0.7	1.4	0.6	0.8
B. FACILITY VISITS (RI)	2497	1122	0	3619	374	217	1869	1668	2871	1339	1869	5279
%	98.2	86.3	0.0	89.8	69.4	69.8	65.3	66.8	86.8	83.1	65.3	88.6
C. PREM B FAC VISITS (RI)	250	159	0	409	162	91	558	811	412	250	558	1220
%	9.0	12.2	0.0	10.1	30.1	29.3	34.1	32.6	12.5	15.5	34.1	18.6

*** N O T I C E - NOT FOR USE OR DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT ***

VP OPERATIONS: SOUTH
 STATE: FLORIDA
 AREA: NOFLA
 DISTRICT:
 SUB-DISTRICT:
 WIRE CENTER: CODE SET: C

SERVICE ORDER AND VISIT ACTIVITY REPORT
 BELLSOUTH TELECOMMUNICATIONS

PROGRAM: RP20B96
 RUN DATE: 01/05/00
 SITE: NORTH FLORIDA
 MONTH ENDING: 12/ 1999
 PAGE: 4

INWARD SERVICE ORDER ACTIVITY

	RESIDENCE				BUSINESS				TOTAL			
	N	T	C	TOT	N	T	C	TOT	N	T	C	TOT
8. TOT SO W/ VISITS (NI)	2670	2323	0	4993	377	234	0	611	3047	2557	0	5604
X	17.9	42.1	0.0	24.5	18.0	24.0	0.0	13.2	18.0	39.4	0.0	22.2
A. PREMISES VISITS (NI)	0	0	0	12	0	0	0	3	11	4	0	15
X	0.3	0.2	0.0	0.2	0.0	0.0	0.0	0.5	0.4	0.2	0.0	0.3
B. FACILITY VISITS (NI)	2309	2078	0	4387	241	179	0	420	2550	2257	0	4807
X	86.5	89.5	0.0	87.9	63.9	76.5	0.0	60.7	83.7	88.3	0.0	85.8
C. PREM & FAC VISITS (NI)	353	241	0	594	133	55	0	188	404	294	0	702
X	13.2	10.4	0.0	11.9	35.3	23.5	0.0	30.8	16.0	11.6	0.0	14.0
9. TOT SO W/ VISITS (ADL)	9402	1889	156	11527	1090	429	2	1521	10572	2310	158	13048
X	63.6	34.3	100.0	56.0	34.3	44.0	0.1	32.9	62.5	35.7	0.8	51.8
10. POTENTIAL SO W/O A VISIT	26078	11492	47	37617	1520	500	1173	3273	27598	12072	1220	40098
X	67.7	72.4	23.2	60.9	48.2	43.4	67.3	52.5	66.3	70.1	62.7	67.2
A. REINSTALLS (NI)	24194	11020	0	35214	1120	416	1173	2717	25322	11436	1173	37931
X	98.9	98.4	0.0	98.7	87.2	81.6	67.4	76.7	98.3	97.7	67.4	96.8
11. DEREGULATED C ORDERS				547				93				640
X				1.0				3.4				1.0
12. REG, REG/DEREG C ORDERS				1830				350				2180
X				3.2				5.4				3.4
13. TOT SO (LINES 1,11,12)				5692				662				6364
14. TOT AUTO COMPLETIONS - N				23237				1314				24551
X				60.2				27.4				56.6
- T				10169				330				10507
X				79.5				3.8				108.0
- C				11450				1007				12537
X				97.9				22.6				76.1
- D				34376				3676				38052
X				99.9				74.7				96.7
- F				16013				1326				17339
X				99.9				95.9				99.6
- R				942				43				985
X				100.0				0.5				10.1
- X				0				0				0
X				0.0				0.0				0.0
15. TOT ALL SVC ORDERS - N				5858				480				4369
- T				15802				1377				17259
- C				116900				97794				164694
- D				34615				4922				39337
- F				14026				1582				17408
- R				942				8700				9730
- X				0				0				0

*** N O T I C E - NOT FOR USE OR DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT ***

LIST OF NEW SERVICES

BellSouth Telecommunications, Inc.
FPSC Docket No. 991378-TL
Citizen's 2nd Set of Interrogatories
May 10, 2000
Item No. 8
Page 1 of 1

REQUEST: Please list all new regulated and unregulated services introduced by the company and handled by the business office personnel that have been filed by the company since January 1, 1996.

RESPONSE: A table is attached that shows new products and services implemented by BellSouth in Florida since January 1, 1996 for which tariffs have been filed.

RESPONSE PROVIDED BY: MaryRose Sirianni
Manager Regulatory
150 South Monroe Street
Tallahassee, FL 32301

Florida Products Implemented since 1-1-96

(Note that this includes enhancements and expansion of existing products)

Filing Package	Effective Date	Detailed Description
FL98-051	10/6/98	(06/19/98) THIS IS REISSUED to revise the Issue and Effective Dates of this filing. Make the Custom Calling Service Three-Way Calling with Transfer available on a basis other than as part of a Two- or Three-Line Plan of a Complete Choice® service or option.
FL97-013	10/6/98	Add new transmission speeds to Frame Relay Service, CDS, and Broadband Exchange Line Service
FL97-008	10/6/98	Add verbiage to allow ECID on series completion arrangements
FL97-021	10/6/98	Allow STS and Hotel/Motel subscribers to choose flat, measured or message rate service.
FL97-176	10/6/98	An Extended Calling Service (ECS) route from Baldwin exchange to Callahan Exchange (ALLTEL) will be implemented October 31, 1997.
FL98-078	10/6/98	Area Transfer will be implemented August 15th for customers in the St. Johns exchange.
FL97-153	10/6/98	BellSouth AIN Service Management System (SMS) Access Service and AIN Toolkit Service are being filed as Unbundled Network Elements to comply with the requirements of FCC Docket 96-98.
FL97-205	10/6/98	BusyConnect is currently being offered under a Market Trial tariff. With this filing, BellSouth is making BusyConnect a permanent service offering.
FL96-145	10/6/98	CourtesyComplete-a new service where business picks up DACC cost when customers request their number from 411
FL96-140	10/6/98	EAS between Panama City to Wewahitchka
FL97-044	10/6/98	ECS Routes will be implemented between Julington and Ponte Vedra Beach, between Gainesville and Cross City, Cross City to Trenton, Cross City to Chiefland, Old Town to Trenton and between Gainesville and Old Town, effective June 13, 1997.
FL98-037	10/6/98	ECS will be implemented between Lake City (BST) and Luraville and the Florida Sheriff Boys Ranch on May 1, 1998.
FL98-024	10/6/98	Enhance Florida's Lifeline plan to increase federal credit amount and expand eligibility requirements
FL97-000	10/6/98	Enhancements to LNA/CAR services
FL97-035	10/6/98	Expand Area Plus service to LATA-wide calling scope
FL97-040	10/6/98	Filing to comply with Florida Commission Order No. PSC-97-0535-FOF-TL which provides a New Connect Report, Sort Extract and Daily Update options to DPDS customers.
FL97-158	10/6/98	FL PSC ordered 911 Service to be available to residential customers whose telephone service had been temporarily denied for non-payment.
FL97-016	10/6/98	Introduce Inward Data Option to PATHLINK Service.
FL97-037	10/6/98	Introduces a Comprehensive Discount for BST, Inc. services for business customers.
FL97-175	10/6/98	Introduction of a new NR chg for short interval Switched and Special Access orders.
FL98-040	10/6/98	Introduction of Bill Management Service
FL97-196	10/6/98	Lifeline and Link-Up compliance filing supporting FCC Order on Universal Service
FL97-003	10/6/98	MultiServ Feature Group 9 is being introduced at the same rates as existing Feature Group 2. FG9 differs from FG2 by offering the Fixed versions of the Call Forwarding Busy Line and Don't Answer features in lieu of the Programmable versions in FG2.
FL96-143	10/6/98	Provides a new toll OCP that will be mainly used on proactive "winback" activities
FL97-187	10/6/98	Removes All Existing Residence Mixing of Service Restrictions, Adds Business Exceptions

FL98-042	10/6/98	Removes applicable resale restrictions from the tariffs.
FL98-023	10/6/98	Restructure of SS7 to utilize the Hub Network concept and be consistent with SS7 from the Access tariffs.
FL97-173	10/6/98	This filing changes the name of Multipoint Video Conferencing Service to BellSouth Video Conferencing Service, introduces a new rate element for Occasional Usage and adds multi-speed capability. In addition, we are dropping FlexServ* Service as an access medium and adding Switched 56 service.
FL98-057	10/6/98	This filing introduces a new device for customers with hearing disabilities called In-Line Amplifier. This equipment will only be available through the TCCD (Telecommunications center for Customers with Disabilities)
FL97-189	10/6/98	This filing introduces a new service offering for business customers called Enhanced Caller ID with Call Management. This offering includes the functionality of the Call Waiting and Caller ID features and provides several additional call disposition options.
FL97-033	10/6/98	This filing introduces two new business service offerings. Business Plus service is an expanded local calling plan. Business Choice service is a package service which includes a Business Plus line and up to five selected calling features.
FL98-026	10/6/98	THIS NOTICE HAS BEEN REISSUED TO REVISE THE ISSUE DATE TO 4-15-98 AND THE EFFECTIVE DATE TO 5-1-98. This filing introduces the business Easy Rate Promotion.
FL98-003	10/6/98	THIS NOTICE IS REISSUED TO REFLECT NEW FILE AND EFFECTIVE DATES. This filing introduces a new service, National Directory Assistance (NDA), in Florida. NDA will enable customers dialing 411 to obtain listed and available telephone numbers of lines located anywhere in the United States.
FL98-035	10/6/98	This service is being filed to offer enhancements to the BellSouth® AIN Virtual Number Call Detail (BellSouth® AdWatch®) Service. This enhanced offering will provide additional caller information on the call detail reports and options for electronic and more frequent delivery of these reports.
FL98-031	10/6/98	This tariff is being filed to convert the BellSouth® AIN SMS Access and Toolkit tariffs from a Limited Service Offering to a General Tariff Offering.
FL98-034	10/6/98	THIS TARIFF NOTIFICATION IS REISSUED TO CORRECT THE FILING PACKAGE NUMBER WHICH WAS PREVIOUSLY SHOWN AS FL97-185 AND ORIGINALLY POSTED ON 9/15/97. THE CORRECT NUMBER IS FL98-034 AS SHOWN ABOVE. This filing renames PATHLINK* Service as BellSouth® Primary Rate ISDN. Other revisions to the tariff are as follows: - Introduction of a provision for Inward Data customers to order additional telephone numbers above the standard allowance at an additional monthly charge. - Redefine the Digital Data Only Next Route Index feature to allow additional overflow arrangements. - Expand the Volume Discount application to include Interfaces and B-Channels of all types on a billing account when determining the level of discount. - Other minor regulation and text revisions.
FL97-155	10/6/98	To expand the Network Interface Rate Elements Available in Exchange Access Frame Relay Service and Exchange Access Connectionless Data Service
FL98-073	10/30/98	10/07/98 - This noticed is being revised to change issue and effective dates. Introduction of Usage Option Plans for ISDN Business Service.
FL98-088	11/6/98	Introduce new service - BellSouth Dedicated Ring
FL98-079	12/3/98	10/26/98 (THIS FILING HAS BEEN DELAYED UNTIL NOVEMBER, 1998) This tariff filing proposes restructure of the Interoffice channels in Commercial Quality Video Service (CQV) and adjustments to nonrecurring charges and certain local channel recurring rates.

FL98-067	12/9/98	10/13/98 THIS NOTICE IS REISSUED BECAUSE the issue and effective dates have been revised. 7/30/98 THIS NOTICE IS REISSUED BECAUSE the issue and effective dates have been revised. 7/1/98 THIS NOTICE IS REISSUED BECAUSE the issue and effective dates have been revised. Introduction of BellSouth's ATM Services and Miscellaneous Fast Packet Services Enhancements
FL98-111	1/5/99	Introduce channels for use with BellSouth Managed Shared service and SMARTGate service (a.k.a. BellSouth Managed SPA Managed Shared Ring Network)
FL98-106	1/5/99	Non-Consecutive DID numbers will be added to the current DID offering.
FL98-105	1/5/99	NOTICE: THE FILING HAS BEEN REVISED TO EXTEND THE PROMOTION SUBSCRIPTION PERIOD TO FEBRUARY 28, 1999. 12/16/98. This filing proposes to introduce the business toll optional calling plan called the Unlimited Calling Plan.
FL98-090	2/10/99	THIS NOTICE IS BEING REISSUED to reflect new issue and effective dates. Location Identification Database Service allows affiliated and non-affiliated entities to purchase E911 location information solely for the purpose of providing E911 Services to Public Safety Answering Points for which the entity is authorized to provide E911 Service.
FL98-116	4/12/99	This filing proposes to change the Easy Calling Plan No. 1 promotion to a full service offering.
FL1999-010	4/16/99	Introducing Change Activity Register Service in FL.
FL1999-032	4/30/99	Flat Rated Non-optional EAS will be implemented from Groveland to Orlando, effective April 30, 1999.
FL1999-110	6/14/99	This filing proposes to combine lines, vertical services, listings and other services into packages for business customers.
FL1999-242	7/1/99	Revisions to Bill Management Service include obsoleting the contract rates and adding charges for Customer Training on the software packages.
FL1999-135	7/14/99	Tariff change to implement FL PSC Order providing a transitional discount to Lifeline subscribers who become ineligible.
FL1999-257	7/16/99	This package will add the Statewide Alphanumeric Assured Paging Plan
FL1999-027	7/27/99	This filing will introduce BellSouth Centrex service, which is a central office based business service for subscribers having two or more lines at one or more premises. BellSouth Centrex service provides an arrangement of switching equipment and station lines for intercommunication among the subscriber's lines and for connection through the local and long distance networks to other subscribers on a dial basis.
FL1999-241	8/1/99	Modifies Directory Assistance Database Service (DADS) to accommodate provision of Non-Published (NP) subscriber addresses, to be used exclusively for the purpose of differentiating an end user listing request.
FL1999-247	8/2/99	This filing will create a separate surcharge rate schedule for operator served calls originating from payphone lines.
FL1999-037	8/3/99	Two-Way DID Trunk Termination with User Transfer for use with MegaLink [^] Channel service will be added to DID service. [^] Registered ServiceMark of BellSouth Intellectual Property Corporation
FL1999-052	8/13/99	Extended Reach Service (ERS) is a new offering for Inward Data BellSouth [®] Primary Rate ISDN customers which will allow them to "extend their reach" from a central metropolitan area into additional intraLATA local calling zones which are "non-local" to the metropolitan area. Telephone subscribers in the "non-local" calling zones will be able to originate calls to the BellSouth [®] Primary Rate ISDN ERS customer without incurring intraLATA toll charges.
FL1999-258	9/8/99	This filing proposes to introduce the new packages for business customers entitled Complete Choice for Business Option 2.

FL1999-270	9/16/99	Changes Privacy Director service from a limited service offering to a statewide service offering- where facilities permit.
FL1999-151	9/28/99	New service providing DID, Outward-or Combination trunks via DS1 transport facilities.
FL1999-293	11/4/99	Mandated filing: Lifeline rules are being modified to comply with Florida Statutes, Chapter 364.604(4), specifying that payment of basic local service charges guarantees a Lifeline customer access to the local network.
FL1999-287	11/18/99	Existing CCB 3-line packages will be grandfathered and new CCB 3-line packages will be introduced. Additionally, Business Choice Package service will be grandfathered.
FL1999-274	12/2/99	MegaLink(R) Light service is a new service providing T1 (1.544 Mbps) transport between the customer's premises and its normal serving wire center utilizing a fiber-based transport link. MegaLink(R) Light service is connectable to other private line services as specified in B7.10.2.A.2.
FL1999-300	12/14/99	Adds a new Custom Calling Svc - Star 98 Access and a new Voice Mail Companion Svcs Pkg
FL1999-045	12/21/99	Miscellaneous Frame and ATM enhancements including ATM IMA, ATA CNM, and ATM Circuit Emulation and miscellaneous changes to Frame and ATM.
FL1999-153	1/5/00	Introduction of a new blocking option for Area Plus customers to block 1+InterLATA.
FL1999-295	1/28/00	Establish separate rate class for multiline packages of Complete Choice® services in Jacksonville and SE Florida metropolitan areas.
FL2000-030	2/1/00	Revised to add consulting services.
FL2000-034	2/15/00	This filing changes the Limited Service Offering of Internet Call Waiting Service to a statewide service offering.
FL2000-036	3/1/00	This filing will offer the SS7 Point Code for Message Waiting Indication for use in providing voice messaging for wireless service.
FL2000-053	3/20/00	The Lifeline tariff is being updated to include terms for connecting Lifeline subscribers to the local network, even though they have unpaid balances for local service, per PSC-99-2503.
FL2000-057	4/3/00	This filing introduces two and three year term plans for Complete Choice for Business customers.
FL2000-043	4/11/00	This filing proposes to add a feature to the CCB list of optional features.
FL2000-028	4/11/00	This tariff filing introduces several new features to BellSouth® Primary Rate ISDN including Calling Name Delivery.
FL2000-080	4/12/00	The Physical Expanded Interconnection Service (PEIS) offering allows Interexchange Carriers as well as Alternative Local Exchange Carriers an alternative to negotiating a Physical Collocation contract.
FL2000-051	5/3/00	This filing introduces a new Consumer Toll Optional Calling Plan.
FL2000-040	5/15/00	BellSouth Remote Access Service is an intraLATA service that provides for the collection, concentration, signaling & aggregation of a customer's dial up data traffic into a hub site.
FL2000-022	5/16/00	Revision to add Internet Report capability and revise pricing.
FL2000-086	5/26/00	This filing proposes to introduce 4-line packages to CCB service.

1 significant impact on call holding times. The company has also entered the
2 wireless, broadband and Internet markets with an aggressive commitments
3 of capital and promotional expense, a process that almost certainly has a
4 major impact on holding times.

5 **Q. Given those factors mentioned by Mr. Lacher, as well as those factors**
6 **you have added, what is the proper number of service representatives**
7 **and repair center attendants required for BellSouth?**

8 A. I don't know, except that the company should have continued to add people
9 and authorize sufficient overtime needed to comply with the Commission's
10 rules. I've attempted to identify and understand the force and load factors
11 that are at work in BellSouth's business offices and repair centers. However,
12 this is BellSouth's problem, not the Commission's problem.

13
14 If the company's top priority was service and compliance with the PSC rules,
15 then the company would never have allowed its answertime performance to
16 be so dismal for such an extended period of time. It is my conclusion that
17 the Company has imposed its own judgement and priorities regarding the
18 level of service it will provide in Florida, and those priorities are inconsistent
19 with the Commission rules. Therefore, I believe answertime performance
20 will not improve for BellSouth until the Commission begins to enforce its
21 rules. It is not fair for the other telephone companies in Florida who are
22 meeting the Commission standards to allow the company to ignore PSC
23 rules in order to increase its profits.

24 **Q. On page 47, Mr. Lacher discusses the use of overtime in the Business**
25 **Office and Repair Centers. What is your response?**

26 A. I would simply observe that the company's performance in answertime during

Exhibit REP-47
Docket No. 991378-TL

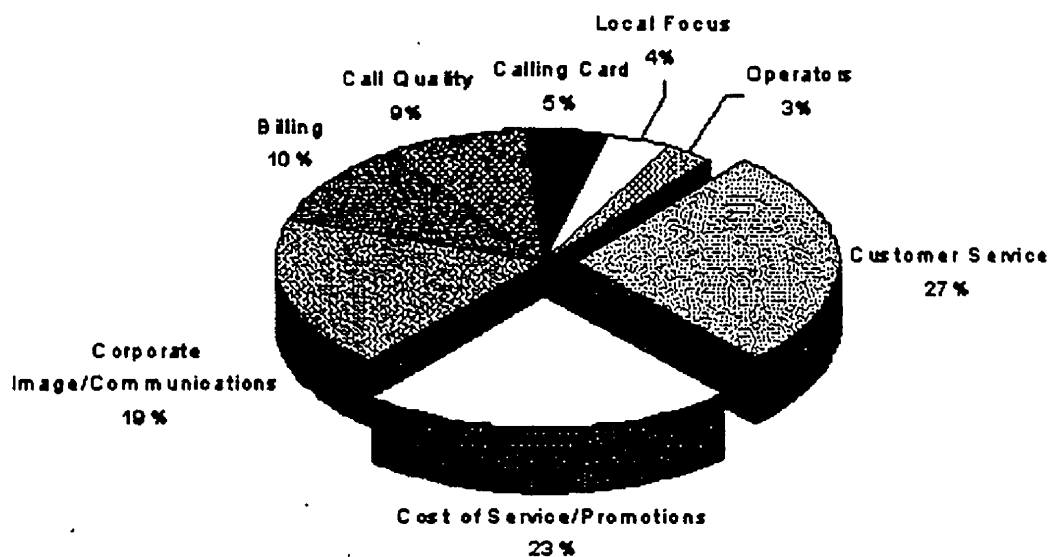
J.D. POWER AWARD

Charts and graphs extracted from this press release must be accompanied by a statement identifying J.D. Power and Associates as the publisher, and the J.D. Power and Associates 1998 Residential Local Telephone Service Satisfaction StudySM as the source. No advertising or other promotional use can be made of the information in this release or J.D. Power and Associates survey results without the express prior written consent of J.D. Power and Associates.

Residential Local Telephone Service Satisfaction StudySM

Customer Service, Cost Of Service Followed By Corporate Image, Have The Most Impact On Overall Customer Satisfaction With Residential Local Telephone Service

Customer Satisfaction Index Weights: Local Telephone



Source: © J.D. Power and Associates 1998 Residential Local Telephone Service Satisfaction StudySM

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*****Telecommunication*****

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KEY FACTORS FOR CUSTOMER SATISFACTION

February 19, 1999

To: Network Vice Presidents

From: James T. Moore, Director - I&M / SSIM / WMC Support

Subject: Proposed Revision of Regulatory Measurements

A regional project has been initiated to minimize the number of measures each state reports to their regulatory commissions and to align the remaining measures with the recognized drivers of customer satisfaction. In studies by Consumer and Small Business, speed of repair and speed of installation were the key factors identified.

The attached matrix outlines the proposed interval measurements for installation and repair by state. We propose to eliminate all other Network measures currently being reported and keep these key customer satisfaction measures. In our presentations to the regulatory groups our focus will be on the customer; therefore, we would like to propose improvements, wherever possible, to the targets listed on the matrix as our covenant to customer satisfaction.

The Regulatory organization is having a regional meeting in less than two weeks and will discuss this proposal at that time. Any information we can provide them concerning improved targets would help support our case.

Please review your targets, as well as those of the other states, and let me know what improvements your organization can make in support of eliminating the other reported measures. ***Provide your new target information to me with a copy to James H. Thomas, jlmiam02, by Friday February 26, 1999. In addition, we would appreciate a person's name and contact information that would be available for updates and questions.*** Keep in mind that our hope is to have the installation and repair interval targets be the only Network regulatory objectives. If there are no present measurements for these intervals, we will not introduce them as new measurements.

I apologize for the short response window; however, the information requested can only be provided by your organizations. Should you have any questions, I can be reached at (404) 927-1404. Staff inquiries may be directed to Jim Thomas at 954-723-2110.

Jim Moore

Attachment

cc: Howard W. Hay
Mike Cassity
Ralph delaVega

Exhibit REP-49
Docket No. 991378-TL

**SPEED OF INSTALLATION AND REPAIR ARE MAJOR
DRIVERS OF CUSTOMER SATISFACTION**

Note that Measures and Targets are out of traditional order. They have been re-clustered to fall under their proposed area of focus.

State	Current Measure and Target	Rationale	Phase One	Phase Two	Phase Three
FL		Let customer satisfaction drive BellSouth behavior		Overall Customer Satisfaction as measured by External Surveys	No reporting
	(1) Completed Service Orders Within 3 Days. Target: 90% (9) Service Order Appointments (Residence And Small Business Combined) Target: 95%	Speed of Installation is a major driver of customer satisfaction	Installation Intervals - Retain current measure (1)	Drop	
	(2) % Out Of Service Troubles Cleared Within 24 Hours Target: 95% (2a) Total Exchanges/ Number Of Exchanges Missing FPSC Objective. Target: 102 (2b) % Of Exchanges Failing To Meet FPSC Rules And Objectives. Target: Not noted (3) % Service Affecting Troubles Cleared Within 72 Hours Target: 95% (3a) Total Exchanges/# Of Exchanges Missing FPSC Objective Target: 102 (3b) % Of Exchanges Failing To Meet FPSC Rules And Objectives. Target: not noted (8) Repair Service Appointments (Residence And Small Business Combined - Excludes Cable Cuts And Natural Disasters). Target: 95%	Speed of Repair is a major driver of customer satisfaction	Repair Intervals - Retain current measure (2)	Drop	
	(4) Answer time - Operator 90% (5) Answer time - Directory Assistance. Target: 90%	Outside scope of this document			

Exhibit REP-50
Docket No. 991378-TL

**SPEED AND REPRESENTATIVE EFFECTIVENESS
HAVE THE MOST IMPACT ON
CUSTOMER SATISFACTION**

EXECUTIVE SUMMARY OF CUSTOMER SATISFACTION KEY DRIVER ANALYSIS

BellSouth conducts approximately 12,000 customer satisfaction surveys monthly. This survey process, referred to as TELSAM, covers the three main service areas of Billing, Provisioning, and Repair. Each survey respondent is asked 10-13 questions about their specific service experience with BellSouth. To rate BellSouth's performance, respondents use a 1-10 scale where 1 is "Poor" and 10 is "Excellent." Each of the three survey types include a question regarding the ease with which the customer made contact with the company. This question is referred to below as "Ease of Contact."

In May 1998 BellSouth conducted a study to determine the key drivers of customer satisfaction for the entire nine-state service region. This analysis used the individual customer responses to each TELSAM survey type (i.e. Billing, Provisioning, and Repair). No internal operating statistics were included.

Methodology

The first step used to identify the key drivers of customer satisfaction is a technique called Classification and Regression Trees (CART). CART seeks to partition a dataset into distinct groupings that reveal cause and effect relationships. In this case, the dataset to be partitioned was the customer responses to the TELSAM surveys. The response variable (variable we sought to predict) was Overall Satisfaction. The remaining TELSAM questions were the potential set of driver variables.

The second step in the analysis utilized a technique known as factor analysis. Factor analysis seeks to group variables together in meaningful clusters or "factors". These factors are then assigned an appropriate label that describes the underlying behavior of the variables included in each factor. For example, factor analysis revealed that the responses to questions regarding the Rep's ability to answer questions, handle the customer's request, and the Rep's professionalism tended to group together. This factor was consequently labeled "Rep Effectiveness."

The software program used to perform this analysis was S-Plus. A summary of the output for both steps of the analysis are in the attached back-up material.

Results of Analysis

The drivers identified as having the most impact on customer satisfaction were Speed and Rep Effectiveness. These results are consistent across the nine-state region.

When the CART algorithm was applied to the data, "Ease of Contact" ranked much lower in impact than other variables. Simply put, far fewer survey respondents consider "Ease of Contact" important when asked about other aspects of their service experience such as Rep knowledge, effectiveness, and the speed at which service is completed. In addition, factor analysis revealed that "Ease of Contact" virtually never fell within one of these groups.

Conclusion

Although customers' access to the business office and repair centers is an area of concern to BellSouth, access in and of itself is not a determinant of customer satisfaction. The "Ease of Contact" question rarely materialized as a driver of satisfaction and when it did, the impact was very slight.

Exhibit REP-51
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NEGLIGIBLE 1999 FORCE ADDITIONS

255-0300



BellSouth Telecommunications, Inc. 305 263-2800
Suite 664 954 492-2800
600 N.W. 79th Avenue
Miami, Florida 33126

Scott A. Mulcahy
Network Vice President
South Florida

00 svcobj.doc
sent 12/29/99
bcc: Ralph

December 29, 1999

To: Rod Odom

Subject: South Florida Service Objectives for 2000

As requested in your December 20th memo, I've completed a service target analysis based on various overtime scenarios. For the record, South Florida has a tradition of delivering on its MDP measures. We're very concerned, however, over the possible negative effects of projected force savings. For example we were allocated a 151-person reduction for Trapper and I believe this is significantly overstated. When you do the math, that's the equivalent of 755 orders saved a day. Assuming 20 days in a work month, that's more than 15,000 tasks per month and, annualized, it's over 180K orders. Nevertheless, based on our projections at a 12% OT funding rate, I believe that South Florida can meet the MDP contracts for all COUs. It has been our experience during abnormal weather events, however, that we could still have trouble satisfying every Consumer measure when prioritization becomes necessary.

Fundamental in our force plan for 2000 is bringing in replacements for our known and projected force losses for 1Q00. The requirement is currently projected at 75 and this will merely keep us even with what I understand our 2000 baseline force number to be. Included in our 2000 program is the planned absorption of the IFITL force if and when this project is transitioned from *pause-mode* to *stop-mode*. I am not concerned with absorbing the 270 technicians that would need to be reassigned because: 1) the continued acceleration of ADSL deployment will absorb some of this force; and, 2) our organization typically experiences an annual turnover of about 500 people. Next year, in fact, we project double that rate due to our aging employee profiles. Together, these factors will help us to reassign all of the current IFITL personnel but only after we first complete the in-progress IFITL work and then perform the cutover functions which will last at least to mid-2000.

To put the force question into perspective, you should understand that South Florida added a negligible amount (less than 30 net) for baseline service in 1999 unlike some of the other areas that added significant numbers to meet their forecasted personnel needs. When you check the numbers, you'll see that we added about 500 regular employees strictly for IFITL, ADSL, and the OSP Engineering take-back but, again, the steady state force remained relatively constant from 1998 to 1999. Next year we are looking at a total reduction to these baseline levels of 315 technicians due to various initiatives. To this, we are expecting a year-over-year expense budget reduction of some \$20M and the requirement to absorb a 4% inflation factor as well as a 5%

productivity factor. I've explained all this to request that when we allot the *final* force take-aways, recognize that South Florida's leadership role in service will only continue if we're adequately staffed. The timing of savings from the initiatives will be extremely critical to executing the overall plan so they must be delivered as promised. If the force savings do not materialize as projected, the impact on our baseline levels will be significant.

Before closing, I should point out that we have equally significant concerns when considering our overtime funding. Specifically, we calculate that a 1% reduction in OT hour funding in turn reduces our available hours by 7,000 - or the equivalent of 5600 dispatchable tasks. Compared to 12% OT, working at 9% would reduce our task clearing capabilities by almost 17,000 tasks per month. To put this all in perspective, a reduction of 3% in our OT hours (from 12% to 9%) would reduce our task-handling capacity by a full 13%. This will no-doubt present a very significant challenge to us in 2000 if enacted. In fact, it is my opinion that running below 12% OT sub-optimizes the organization. South Florida has traditionally run at a 13% or 14% OT rate, allowing us to operate lower in the springtime and higher during both the summer and seasonal load periods.

Rod, no matter what the final decisions are, you can count on us to do our part in process improvement and prudent force management. It is a fact that we in South Florida balance the Force-Load-OT equation as well as any team in the company. Furthermore, we have a proven track record for delivering on our commitments and we will exercise every control in our power to do so again next year. You can count on the South Florida Team - if it *can* be done, we will do it!

A handwritten signature in black ink, appearing to be "Rod", written in a cursive style.