BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

- x

In Re: Request for arbitration concerning :
complaint of IDS Telecom, LLC against :
BellSouth Telecommunications, Inc., :
regarding breach of interconnection :
agreement :

- x

REDACTED

Docket No.
010740-TP

Pages 1 - 145

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Deposition of Mary Batcher, Ph.D.

Washington, D.C.

Thursday, September 27, 2001

Reported by: Marian E. Cummings, Notary Public

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Deposition of Mary Batcher, Ph.D., held at the offices of:

Ernst & Young
1225 Connecticut Avenue, Northwest
Washington, D.C. 20036

Pursuant to notice, before Marian E. Cummings, a Notary Public of the District of Columbia.

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PROCEEDINGS

Thereupon,

MARY BATCHER

the Witness, called for examination by counsel for the Plaintiff, and, after having been sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE PLAINTIFF

BY MR. MILLER:

Q Good morning.

A Good morning.

Q My name is Brian Miller and I represent IDS Telecom. Could you state your name for the record, please, and spell it?

A Mary Batcher, B-a-t-c-h-e-r, and Mary is M-a-r-y.

Q And where are you employed, Dr. Batcher?

A I'm employed by Ernst & Young LLP at 1225 Connecticut Avenue, Northwest, Washington D.C.

Q Have you ever had your deposition taken before?

A No.

Q Well, let me explain to you briefly how it

works. I'll ask questions, you answer the questions. Try not to speak over me and I'll do the same so that the court reporter can take down both of what we're talking about, and if you can try to wait until I'm finished with my question that will make it easier for the court reporter as well. If at any time you want to take a break or if you have to clarify a question or ask me, if you don't understand the question or you can't hear me please feel free to do so, is that all right?

A Yes.

Q Are you under any medication today that would affect your ability to answer my questions completely and truthfully?

A No.

Q How long have you been employed with Ernst & Young?

A Four and a half to five years. I can figure out exactly if you need that.

Q Has all of that time been in Washington D.C.?

A Yes, it has.

Q And what did you do prior to becoming employed by Ernst & Young?

A I worked for the Internal Revenue Service in the statistics division.

Q What were your job responsibilities at the IRS?

A At the IRS I headed a group that designed surveys for performance measures and samples for new initiatives that the agency was undertaking and to measure the accuracy, for instance, of the telephone system, the telephone assistance system, you can call to get help with your tax returns.

Q Did you conduct surveying sampling while you were with the IRS?

A Yes.

Q Where were you employed prior to the IRS?

A Prior to the IRS I was at the National Center for Education and Statistics where my primary responsibility was to conduct administrative surveys which are surveys of records rather than people of the state education agencies.

Q What do you mean by surveys of records rather than people?

A There was a survey form that someone in the

education agency would fill out but we didn't have to survey teachers and students, they would go to their records and fill out, for instance, the total expenditure per pupil on something.

Q So you were conducting surveys but not actually speaking with people on doing those surveys, rather gathering information?

A Well, we were speaking with people in the education agency but we were not going directly to students, teachers, principals, anybody like that. It was a record -- they would retrieve the information from their records.

Q And how long were you employed with the National Center for Education and Statistics?

A Three and a half years.

Q Was that in Washington D.C.?

A Yes.

Q I'm sorry, I don't think I asked you, how long were you employed with the IRS?

A I think it was almost ten years, or right around ten years.

Q Also in Washington D.C.?

A Yes.

Q Prior to the National Center for Education and Statistics where were you employed?

A I was in graduate school prior to that so I was employed by the university in a teaching capacity and I had a fellowship, things of that sort.

Q Where did you attend graduate school?

A The University of Maryland.

Q And you have a Ph.D. from the University of Maryland?

A Yes.

Q What other degrees do you hold?

A I have a master's in statistics from the University of Maryland and a bachelor's in sociology, also from the University of Maryland.

Q When did you graduate from undergraduate?

A That was a long time ago, it was around '83, '84.

Q What is your current job title at Ernst & Young?

A I'm a principal and I head the statistics group so my title would be national director statistics

and sampling.

Q Are you an auditor?

A No.

Q Are you within the tax division of Ernst & Young?

A Yes.

Q Are your statistics and sampling duties limited to issues related to tax?

A No, they're not.

Q Have you had the same position for the entire length of time you've been with Ernst & Young?

A No. I came in as a senior manager and became a principal a couple of years ago. There were two of us sort of heading up the statistics group when I came in.

Q When you first joined Ernst & Young were you also national director of statistics and sampling?

A No.

Q When did you obtain that promotion?

A About the same time I became a principal.

Q And that was approximately two and a half years ago; is that right?

A Yes.

Q How many papers, if any, have you published in the last, let's say, the four and a half years you've been with Ernst & Young?

A Not too many, the refereed publications I only have one in the last, in the time I've been at Ernst & Young. I've done several nonrefereed, maybe three.

Q What do you mean by a refereed publication?

A A refereed is a more technical. When you submit it it gets sent to reviewers who, three blind reviewers, typically, who send back comments and make a recommendation as to whether it should be published in the journal.

Q So that would be an article that is published in a professional journal?

A Uh-huh. The others were also professional, like conference proceedings, so they were in statistics but they were not in a journal.

Q What was the topic of the one refereed publication that you published at Ernst & Young?

A That was a publication, it was actually a book and it was a compendium of articles published by SIAM, the Society of International Mathematics and something,

I don't remember what SIAM stands for but --

Q What are the letters that are in that acronym?

A S-I-A-M, and that was actually a series of case studies for teaching, to be used for teaching, and I collaborated with someone from Penn State on that one.

Q Were they to be used for teaching statistics?

A Yes, so our topic was a time series example.

Q What is a time series example?

A Where you model behavior of something over time.

Q What were the topics of the other three articles that you mentioned that were not refereed publications?

A One was a sampling, I'm sorry, one was a survey, the oldest was a survey that we did at Camden Yards. It was actually a series of surveys. There was one survey that was done over and over and over again throughout the entire season so that we could get a measure of the whole season and it was a fan survey. Then the other two were both sampling topics, sample design.

Q Where was the article regarding the Camden

Yards survey published?

A In the proceedings of the American Statistical Association of the Survey Research Methods Group section.

Q I'm sorry, what was the last part?

A The American Statistical Association Survey Research Methods section.

Q Are you a member of that section?

A Yes.

Q What information were you eliciting from the people at Camden Yards for that survey?

A We were asking them things like where they came from because there was a desire to find out how wide the drives to Camden Yards. They knew people from surrounding states but tried to get a sense of that, and how much they spent at the park, in the neighborhood around the park, did they stay in a hotel, that kind of thing.

Q And who commissioned that survey?

A Major league baseball.

Q In that survey did you or the people conducting the survey inform the participants that the

survey was being conducted by major league baseball?

A Yes.

Q What efforts did you take in that Camden Yards survey to ensure that the sample is representational of the universe of people who attend Camden Yards?

A That survey was an intercept survey and they are very hard to insure representativeness so some of the methods that you can use and if you can do it as they're coming in and take every nth, every third, every fifth. Unfortunately, they come in too fast to stop them at the gate except in the very early time so we also made sure that we had survey takers throughout the stadium. The Orioles did not want us to go down into the stands and bother people in their seats so we had to reach them in the, when they were getting food and going on their way in and out. And so we used counting methods of people in line at the food service or at the ATM. We also mapped as we went. We used coverage mapped -- we mapped we asked them where they were seated at the game and we mapped the seating areas where we had received an answer from someone and so that way we knew if we were missing any major parts of the ball park and

made sure if we saw an area was sparse we moved more survey takers over to that area. And we surveyed all levels, club level, the general access levels. We also compared our estimates with the gate totals to make sure that we were in the ball park, if you will. Unintended pun.

Q With the other two articles that you mentioned that were not refereed publications what were -- well, let's take the first one in time, what was the topic of that article?

A That was, let me get these two straight, that was on balanced sampling.

Q What is balanced sampling?

A Balanced sampling is a method to ensure that you -- normally samples in large sample cases are done, you insure representativeness by things like stratification by the size of the sample, but if you have a high cost to review each sampled element or to do whatever you're going to do with each sampled element, this is generally not in a survey situation, you have to keep the sample fairly small. So one way to insure representativeness, get good estimates, is to look at it

as you select it and so there are several methods to insure this balance. But essentially you monitor your sample and if, and you look at the mean of the population or on some variable that you know and the mean of the sample on some variable that you know and if you see that it's, and also the variants, if you really want to do it right, you make sure that if you're falling well below the mean then you sample from the low end more for the next set of sampled elements that you select. If you're running -- what did I say, I said that wrong. If you're running below you sample from the high send, if you're running above you sample the next set from the low end so that your sample is maintained. That's the traditional way of doing it. We postulated another method which is to do very deep stratification and in that case you would do very tiny, samples of one or two per stratum or three but very small and then keep the sampling rate the same in all of those and then collapse the straight up for your estimation.

Q What do you consider, at least in the context of that article, to be a large sample size?

A In the context of that article a few hundred

would be large, we're talking about very small here.

Q And the second article that, I'm sorry, it would be the third article, actually before I get to that let me ask you where you published the article regarding balanced sampling?

A The American Statistical Association Survey Research Methods proceedings, all of them are in that proceedings.

Q Are those proceedings published in a journal or are they handouts that are given --

A They're not handouts, I'm sorry. You can purchase them from the ASA. They're bound, not hand bound but soft bound.

Q And the third article, I'm sorry, we were starting to get into that, what was the topic of that article?

A That was on estimation. When you have what might be considered an audit situation where you have very low error rates, estimation becomes problematic because what you often have is a lot of zero error. Most of what you see is zero error and then you have a few very high, well, not necessarily very high, but a

few outliers that are much higher than zero.

Q What do you mean by an audit situation?

A When you audit something you are typically reviewing whether it's correct or not correct and you're recording the dollar amounts of the incorrect and in those situations most of what you look at is correct but you have these few that are incorrect and it complicates the estimation.

Q And what was the thesis of that article?

A We proposed an approach using mixture distributions to estimating.

Q What are mixture distributions?

A Where it's a combination of, you know, flat, basically a distribution where everything is zero and then another distribution where it's non-zero and has some other shape.

Q Where was that article published?

A The same place, the proceedings of the survey research methods of the American Statistical Association.

Q Have you ever published any articles regarding surveying or sampling in the telecommunications

industry?

A No.

Q Prior to the BellSouth survey that was recently conducted for which you're here today have you conducted any other surveying for clients in the telecommunications industry?

A No.

Q I'd like to mark as Exhibit Batcher 1 Dr. Batcher's nonpublished testimony in this proceeding before the Florida Public Service Commission dated August 27th, 2001.

(Exhibit Number 1 was marked for identification.)

BY MR. MILLER:

Q Dr. Batcher, let me hand you what's been marked as Exhibit Batcher Number 1 and ask you to identify that for the record, please.

A That's the testimony I submitted.

Q Are you the same Mary Batcher who submitted that testimony?

A Yes.

Q Do you have any corrections that you would

like to make to your testimony as filed with the Florida Public Service Commission?

A There were a couple of typos in there and of course these are preliminary results, we do now have final results.

Q Have you filed the final results with the Florida Public Service Commission?

A No.

Q Do you know where the typos are that you're referring to?

A I know where a couple of them are and there was another one that when I went back through this last night I didn't find but I know in one I wrote it was a typo and instead of IDS I think we wrote ISD. On page 10 line 17 it should be interviewers.

Q "In insuring interviewers"?

A Yes. And then on page 12 line 3 it automatically stores the disposition of each attempt in, that "is" is a mistake.

Q Okay.

A And there was also a paragraph that we were going to strike because the sample size was not large

enough to support the -- the confidence interval was too large on those.

Q Which paragraph is that?

A Hold on. Page 6, the paragraph that begins on line 7.

Q "Only 3 percent of respondents cited company image as a reason for switching," that paragraph?

A Yes.

Q So you would strike that paragraph in its entirety.

A Yes. Well, I would keep the "only 3 percent," and maybe move it up to the previous paragraph but the breakdown of that 3 percent is very tiny numbers.

Q So you would strike, just so we're clear I'll read the entire portion that you would strike.

A Right.

Q "When that 3 percent was asked what information influenced their opinion, 12 percent, (of the 3 percent) said mail material, 12 percent, (of the 3 percent) said television or radio advertisements, and 29 percent (of the 3 percent) said calls from BellSouth. 36 percent (of the 3 percent) said other or could not

recall."

A That's correct.

Q That's the entirety of what you would strike?

A Yes.

Q And, again, what is the reason you would strike that language?

A Well, these were preliminary results. We weren't sure how big the sample was going to be when it came in but the sample did not end up big enough to break down 3 percent of the respondents into these different categories. The 36 percent and the 29 percent might have been okay but the small categories, that probably had 4 or 5 in each, the confidence interval was just too big.

Q So the sample size in each of those categories was just to small to draw any conclusions; is that right?

A Right, to -- yes, that's correct.

Q And I believe you mentioned there was also a typo that you can't locate where the IDS was misspelled as ISD?

A Yes.

Q Are there any other changes or corrections that you'd like to make to the testimony?

A No.

Q Have you ever conducted surveys using ORC Macro in the past?

A Yes, we have.

Q How many times?

A Four or five, maybe more. We surveyed, we used them for an FCC survey. We've used them in a number of settings.

Q Have you personally conducted surveys for other clients of former customers of such clients?

A No.

Q When were you or Ernst & Young, when I say you in this context I mean Ernst & Young, approached by BellSouth to conduct the survey which is the subject of your testimony?

A The first contact was not with me but I believe it was in the July, August, late, mid to late July or early August time frame.

Q Who was conducted?

A Ed Mulrow.

Q Can you spell that, please?

A m-u-l-r-o-w.

Q What is his position?

A He's a senior manager with the firm in this group, in my group, and he does the performance measures work for BellSouth.

Q Do you supervise Mr. Mulrow?

A Yes.

Q When did you personally, meaning you Dr. Batcher, first become aware of BellSouth's desire to conduct a survey of former IDS customers?

A Not too long after that, end of July, early August. It must have been, yeah, somewhere in that range.

Q And how did you learn of the proposed BellSouth survey?

A We have a survey group and I think Doug Lackey called the head of that survey group and we spoke to him together.

Q Who is the head of that survey group you're referring to?

A Glenn White.

Q Do you supervise Mr. White?
A Yes.
Q Did you supervise all Ernst & Young personnel who were involved in the BellSouth survey that's the subject of your testimony?
A Either directly or indirectly, yes.
Q Were you the senior-most person at Ernst & Young overseeing the BellSouth survey?
A Yes.
Q When was your first contact with somebody from BellSouth, meaning you personally?
A Sometime -- about this survey?
Q Yes, I'm sorry, about the survey.
A Sometime in early August.
Q How did that contact come about? In other words, was it a meeting, was it a telephone conversation?
A It was a telephone conversation.
Q And with whom from BellSouth did you speak in that?
A Doug Lackey.
Q What did Mr. Lackey ask Ernst & Young to do at

that point?

A He asked whether we could do a survey of former customers to determine, former customers of IDS who had returned to BellSouth and determine why they left IDS and came to BellSouth.

Q When was Ernst & Young formally retained to conduct the survey that's the subject of your testimony?

A I'm not sure exactly. Right away pretty much, I mean.

Q Once you cleared conflicts?

A Cleared conflicts, well, we knew that, yeah, once we cleared conflicts and kind of got through the contractual hurdles that are there.

Q Does Ernst & Young perform other services for BellSouth?

A Yes.

Q Is Ernst & Young BellSouth's regular outside auditors?

A No.

Q Does Ernst & Young perform tax services for BellSouth?

A I don't know about tax services.

Q Who made the decision to conduct the survey as a -- well, actually let me first ask you, what technical term would you use to describe the methodology that you utilized in the survey conducted for BellSouth?

A In the implementation of the survey?

Q Yes.

A It was a computer assisted telephone interview survey.

Q And how would you describe it statistically?

A I don't think there is a statistical definition of a survey. It was a random, a survey of a random sample of former customers of IDS who went to BellSouth.

Q Was it an open-ended survey?

A The questions were pretty much primarily phrased in an open-ended manner, yes.

Q But it was not a true open-ended survey?

A I don't know what you define as a true open-ended survey.

Q Would you characterize the survey that you conducted for BellSouth as an open-ended survey?

A I'm not sure I would characterize any survey

as an open-ended survey. Questions are open ended but surveys, typically I wouldn't think of a survey as open ended or not.

Q Would you characterize the survey that you conducted for BellSouth as precoded?

A Again, some of the questions were precoded. Well, tell me what you mean by precoded.

Q Tell me what you mean by precoded.

A Well, if you mean did we put answers in before we talked to the respondent, no. But if you mean did we have categories that respondent's answers were coded into once they gave their answer, yes.

Q For certain questions?

A Well, ultimately for all the questions but it was open ended in the sense that we didn't read the categories to the respondents. We asked them to speak, tell us why, recorded as much of that verbatim as the interviewers could capture, and then coded their answer into a set of closed categories.

Q I'm sorry, can you read that whole answer back? I'm not sure I understood it correctly.

(Whereupon, the court reporter read back the

previous answer.)

THE WITNESS: One of those categories included other.

BY MR. MILLER:

Q Did each question in the survey contain one category that was coded as other?

A I'd have to look again at the survey, probably not the simple screening questions, are you the person who made decisions, yes or no.

Q Who drafted the script that was used by the interviewers in the survey?

A Rob Wederich is a psychologist in our survey center and his area, his specialty area is questionnaire design, how do you word the questions so that they're not leading or biasing.

Q Can you spell Mr. Wederich's name for the record, please?

A W-e-d-e-r-i-c-h.

Q And I'm sorry, is he Mr. Wederich or Dr. Wederich?

A He's mister.

Q And Mr. Wederich is employed by Ernst & Young;

is that correct?

A That's correct.

Q And was he the one who drafted the script that was used by the interviewers in the survey?

A Yes, he is.

Q Did you have any input in the drafting of the script?

A I reviewed it, I don't recall whether I suggested any changes.

Q Did Mr. Lackey also review the script that was drafted by Mr. Wederich?

A Yes, he did.

Q Did Mr. Lackey suggest any changes to the script that was drafted by Mr. Wederich?

A We initially brainstormed categories and also talked to Mr. Lackey about what the categories, what kind of categories would people be likely to mention and we put one in there that was line quality and he said that that would, should not be an issue since they were both basically the same lines, so we took that one out.

Q Just so I can understand what you're saying, you removed the line quality category because the

customers of IDS were using the same telephone lines as BellSouth customers; is that right?

A Yes.

Q Was this brainstorming session that you described an in-person meeting or a telephone conversation?

A It was -- it was a brainstorming among ourselves in Ernst & Young and it was a telephone conversation.

Q So Mr. Lackey didn't participate in that particular brainstorming session that you've described?

A No.

Q Did you consult with anybody for purposes in that brainstorming session among Ernst & Young personnel who were familiar with telecommunications issues?

A I don't know if we did or not. We didn't have anyone on the brainstorming but I don't know if either Glen or Rob got input from Ed on that, it would be Ed Mulrow.

Q How did Mr. Wederich decide on the categories into which responses would be coded?

A How did he decide?

Q Yes.
A We -- he -- we put down all the categories we could think of, trying to be inclusive.
Q Did you or anybody else at Ernst & Young review any of the pleadings in this action in coming up with the categories for purposes of the survey?
A No, we did not.
Q Whose idea was it to include as a category in the survey whether former customers of IDS authorized switching their telephone service from BellSouth to IDS in the first place?
A In the material that you gave us --
Q That who gave to you.
A I'm sorry, that we gave you, there's an e-mail from Doug Lackey where he gave general information about the types of things that would be, that he would be interested in capturing in this survey and in that he talked about the switching and the reasons for switching and what some of those might be.
Q What independent research did Ernst & Young perform to come up with categories for reasons why people may have switched telephone service other than

the categories given to you by BellSouth?

A We didn't do independent research. We're all sort of consumers of telephone services and we thought of all the things that might be problematic and make us switch, or not problematic but make us switch, like prices.

Q Did you consult with anybody at ORC Macro regarding the questions to be asked in the script?

A We sent them a draft and invited any reaction or comments because of course they have to be able to implement and I don't believe they had anything that was of great substance, they may have. I don't know what their response was. I know that the script did not change dramatically.

Q The script did not change dramatically after you sent it to ORC Macro for their review?

A Right.

Q Did you inform anybody at ORC Macro for whom you were conducting the survey?

A No.

Q No one?

A No one. In fact, we asked them afterwards who

they thought we were conducting the survey for and they thought it was IDS because they thought IDS was doing a customer satisfaction survey trying to find out why people left.

Q And who at ORC Macro told you that after the survey was completed?

A Mike Foisey.

Q Can you spell that for the record, please?

A I think it's F-o-i-s-e-y or Y.

Q And what is his position at ORC Macro?

A He's in charge of a group. I don't really know his exact position. He's our normal contact person.

Q What's he supervising the implementation of the survey at ORC Macro?

A I can't address exactly what their organizational structure is, he was our day-to-day contact.

Q Did Mr. Foisey or anybody else at ORC Macro tell you or anyone from Ernst & Young during the course of the survey who they thought the survey was being performed for?

A No.
Q So this conversation that you described occurred only after the survey was complete?
A That's correct.
Q How many customers, in total, were you able to contact and obtain results from for the survey?
A It was 560 something.
Q 560 approximately?
A Yeah, 564 or 568, something like that.
Q When was the survey completed?
A We had them doing calls. I'm not sure exactly, it was whatever the contract specified through the end of the first week of September, I believe, and at the end, though, all they were doing was trying to contact numbers that they had not been able to reach. They were contractually obligated to make 15 attempts, up to 15 attempts per respondent before they gave up.
Q How many respondents total were in the pool of former customers that ORC Macro attempted to contact?
A How many sampled?
Q Yes, how many sampled.
A I don't recall. It was, I want to say it was

over a thousand but not much, 1100, 1200, somewhere in that neighborhood.

Q And you described those people as the sample, is that the right term for me to be using?

A Yes.

Q What term would you use to describe the total population of former IDS customers that the sample was intended to represent?

A You just used a very good term, the total population.

Q Thank you.

MR. MEZA: When you're ready for a break, Brian. It's been almost an hour.

MR. MILLER: Okay, maybe another five minutes.

BY MR. MILLER:

Q How many former customers were in the total population for the survey?

A Approximately 13,000, 12- to 13,000.

Q How did Ernst & Young determine the total population was 13,000?

A That's -- BellSouth gave us the total population of people that came back to BellSouth from

IDS in 2000 and 2001.

Q So as you understood it the total population was all former customers of IDS who went back to BellSouth during the years 2000 and 2001 up to the time of the survey?

MR. MEZA: Object to the form.

BY MR. MILLER:

Q You can answer.

A Okay. I think there was like a starting month and an ending month for this. I don't recall right now but I believe it was since some date in 2000 and I don't know whether it went to the present. I think it ended short of the present.

Q For whatever the time period was for which these customers had left IDS was it your understanding that the total population was comprised of all customers who went from IDS to BellSouth during that time period?

A Yes.

Q And who at BellSouth provided that information to Ernst & Young?

A It came from Doug Lackey but clearly someone else put the data files together for him.

Q Why do you say that?
A Well, most lawyers don't know how to put data files together unless he's a computer programmer at heart.
Q Did BellSouth provide lengthy listings of customer names and telephone numbers to Ernst & Young?
A They provided us with the name and the telephone number electronically on a data file.
MR. MILLER: I guess it's close enough to five minutes. Do you want to take a break?
THE WITNESS: Sure.
(Brief recess.)
BY MR. MILLER:
Q Back on the record.
A Yes, I wanted to correct, I misspoke a little while ago. You asked me how many customers I wasn't focused on what, it was actually approximately 13,000 service orders in the population, not individual people.
Q And what is a service order?
A I assume it's the order to incorporate service or to begin service but I don't know for sure, or to do some change to the service but it relates to phone

numbers rather than customers.

Q So would it be correct to say that there are 13,000 lines in the total population?

A Yes.

Q And how many lines were in the sample?

A At that point we had unduplicated them before we sampled so the 11- or 1200 or were people.

Q So the number that you gave me earlier in the sample is actual customers?

A Yes.

Q As opposed to number of lines?

A Yes.

Q Who determined the sample size?

A One of our senior consultants under my supervision.

Q What was that person's name?

A Ryan Petska.

Q Can you spell that for the record, please?

A P-e-t-s-k-a.

Q How did Mr. Petska determine the sample size?

A He used conventional mathematical formulas to determine under conservative assumptions, what size

sample would be needed to achieve 95 percent confidence and 5 percent precision in each -- by precision I mean the size of the plus or minus factor, and he did that within each of three groups.

Q Did Mr. Petska perform these calculations before the aggregation of lines into numbers of customers that you spoke of earlier?

A No. He would have, you have to use the unit that you're going to sample on so it would have been, it's basically based on the counts and he would have based it on the counts on a disaggregate, that's not the right word, the counts sorted out unduplicated customers.

Q Unduplicated, that's probably a better word for us to use.

A Yeah.

Q Just to make sure that I understand your testimony correctly, is it true that Ernst & Young unduplicated the 13,000 lines into numbers of customers before the sample size was determined?

A Yes.

Q And who performed the unduplication?

A Ryan Petska.

Q How did Mr. Petska determine how many customers were comprised in the 13,000 lines?

A In our practice we do a lot of unduplicating of data files. It's not at all uncommon to receive data files with multiple entries for the same or for -- for the same customer, the same account or the same whatever. And the way we do it is we use SAS, statistical computer software, and sort and match by name, by name and address, by account number, by whatever we have on the data file that's unique to what you're looking at.

Q And is that the methodology that you in fact used in this case?

A Yes.

Q Did BellSouth assist Mr. Petska in the unduplication effort?

A No.

Q How many customers were represented in the total population of 13,000 lines after the unduplication was performed?

A I don't recall offhand, I don't have that with

me.

Q Fewer than 13,000?

A Oh yes. You don't generally increase, if you do, you've done something wrong.

Q Is it more than 5,000?

A I don't remember. It should be in the material that we gave you, though.

Q After Mr. Petska unduplicated the total population, the 13,000 lines, how did Ernst & Young determine which customers would be included in the sample?

A Within the three groups of unbundled, resale and people who reported having been slammed when they went back we used computer generated random numbers to select the correct sample size and the random numbers were generated in SAS which has a good track record for being truly random or close to random.

Q Who determined which customers would fall into each of the three groups that you mentioned to me?

A They were labeled on the population file that we received.

Q Can you explain what you mean by they were

labeled on the population file that you received?

A There was an indicator on the file that said group one is this, you know, everybody in one group had a number or letter or some designation on the file.

Q So the total population information that was provided to you by BellSouth was broken down into these three groups by BellSouth?

A Yes.

Q And the aggregate of the three groups comprised approximately 13,000 lines; is that correct?

A Yes.

Q What are the three groups, again, just so we're clear?

A One was resale.

Q Resale, what is your understanding of the customers who were comprised within the resale group?

A I'm not the best person to ask what resale means. My understanding is that it's just a flat reselling of the services without breaking them apart.

Q What is the basis for your understanding?

A Listening to people talk about it.

Q In the course of this survey or elsewhere?

A In the course of this survey and elsewhere.

Q Did you ask anybody at BellSouth what -- I'll rephrase that question.

Did you ask anybody at BellSouth how the customers in the resell group were determined to fall into that group?

A No. I think Doug, in his initial e-mail to describe what we were doing, had some general verbiage about how these groups differed.

Q Approximately how many lines were represented in the total population of the resale group?

A I don't know that offhand.

Q Were the sizes of the three groups that you mentioned earlier UNE, resale and slammed customers, approximately equal?

A I wouldn't want to swear to that in this because I haven't looked at it recently but my recollection is that they were not hugely different in size, approximately equal.

Q What is your understanding of the UNE group that you mentioned?

A Those are unbundled services where you could,

IDS could, sell individuals service rather than the whole package, is my understanding.

Q Was it your understanding that the UNE group was comprised of customers who had UNE service from IDS and then switched to BellSouth?

A I don't know, I hadn't even thought about that.

Q Did you ask anybody at BellSouth how the UNE group was determined?

A No, it wasn't particularly important for our purposes.

Q Why not?

A Because they were, we were using it just to make sure that all the groups were covered and that we could give good estimates.

Q What do you mean by make sure that all the groups were covered?

A Well, if you put absolutely no control over a sample by chance it's very rare but by chance alone you could get your entire sample in one group and we didn't want that to happen.

Q So in other words, you wanted to make sure

that the selection of the sample would poll people from each of the three groups?

A That's correct.

Q And not a disproportionate number from any one group?

A There was some, we weren't sure how big a sample return we would get from each. And we weren't sure if it was even needed but we actually designed a fairly large sample so there was some thought that we might be able to have enough to break out and make separate estimates for the three groups. As it turned out, we designed for that possibility.

Q Were you able to break out among the three groups as you had designed?

A Not with enough precision, so instead they ended up being put together in one group with proper weighting and a probably larger sample than was needed for the estimates that we used.

Q How was the proper weighting that you described performed?

A It's the, it's the inverse of the sampling fraction. So if you sample from one group, say, you

sample from one and two in one group, and these were all not nearly that far apart but for illustration if you sample one and two then that person represents two people. So you can think of it as multiplying it by two. If you sample one in ten that one person represents ten people so you would multiply that one by ten, that person's responses, so that when you put them together they're put together correctly.

Q So in other words, if you had one group that was one out of two people and another group that was one out of ten people you would multiply the first group by two and the second group by ten in order to have weighted results?

A Yeah, before you put them together so that you would correctly represent the population, otherwise if you didn't do that then you would be, the first group would have too much influence on the answer, disproportionate influence.

Q What was your understanding of the third group, the slammed customers group, as you described them?

A My understanding was that those were customers

who when they came back to BellSouth reported that they had been switched without their consent.

Q And to whom did those customers report that they had been switched without their consent?

MR. MEZA: Object to the form.

BY MR. MILLER:

Q You can answer.

A Okay. I don't know exactly who they reported to. My understanding is they reported that to BellSouth when they returned.

Q Who determined the total population of customers, I'm sorry, lines in the slammed group?

A They were those lines that were identified by BellSouth as having reported that so that would have been BellSouth.

Q Did you ask anybody at BellSouth how BellSouth came to the determination that those customers felt they had been slammed?

A I didn't ask but I had been told that they reported when they came back that they had been switched without their permission.

Q Were there any changes in the total population

from the time that BellSouth first provided that information to Ernst & Young to the time that survey was conducted?

A There were unduplications.

Q Performed by Ernst & Young, right?

A Yes.

Q Which would not result in any additions or deletions to the total population, correct?

A That's correct.

Q Go on.

A And then of course there were some that as we did the survey some of these numbers were almost, were almost two years old and so sometimes the number had changed or the business was no longer in business or something like that, there was, so in terms of that those were not viable numbers or viable survey targets.

Q Were there any other changes made by Ernst & Young to the total population?

A No.

Q Any other changes made by BellSouth to the total population?

A No.

Q Any other changes made by ORC Macro to the total population?

A No.

Q Where were the customers in the total population located geographically?

A I don't know, all the states, it was Florida plus I think somewhere in Georgia. Some were, I think, in I'm not sure about Tennessee but I believe there were some there. There was a scattering of customers throughout several states.

Q The customers were not all from Florida?

A No, they were not.

Q Were the customers in the sample all from Florida?

A No.

Q What is the -- let me ask the question a different way.

What percentage of IDS's total lines are comprised of resale customers?

MR. MEZA: Object to the form.

THE WITNESS: I have absolutely no idea.

BY MR. MILLER:

Q What percentage of IDS's total customers are comprised of UNE customers?

MR. MEZA: Object to the form.

THE WITNESS: I have no information about IDS's total customer base.

BY MR. MILLER:

Q Did you make any effort to determine the composition of IDS's total, I'm sorry, customer base in performing the survey?

A No. It really wasn't -- our interest in the survey was to find out about why customers left IDS and went back to BellSouth, not about their general customer base.

Q What percentage of those customers who had left IDS and gone to BellSouth were resale customers of IDS?

MR. MEZA: Objection, asked and answered.

BY MR. MILLER:

Q You can answer.

A Would you say it again.

Q Sure. To clarify just in response to Jim's objection I'm not asking about current customers. I'm

asking of the customers who have left IDS and gone to BellSouth what percentage are resale, I'm sorry, were resale customers of IDS?

A I don't know exactly. The groups were not terribly different in size so I just don't know.

Q Would the percentage of IDS customers who left for BellSouth who were resale customers of IDS be equal to the percentage of the total population that was comprised in the resale group in your survey?

MR. MEZA: Objection.

THE WITNESS: You'll have to say that again. I didn't follow the whole thing, you lost me somewhere.

BY MR. MILLER:

Q Is the percentage of IDS customers who left IDS during the time period of your survey --

A Of the percent based on IDS?

Q Yes, the percent of total IDS customers who left IDS during the time period of your survey and went to BellSouth and were resale customers of IDS equal to the percentage that you would derive by taking the size of the resale group in your survey divided by that total population?

MR. MEZA: Object to the form of the question, you can answer if you can.

BY MR. MILLER:

Q Let me clarify the question, I want the percentage in terms of lines so that we're talking about an equal comparison as opposed to customers.

A It sounds like you're asking me about the percent of IDS customers.

Q Yes.

A And I have no way to know the percent of IDS customers that are in any particular category. I only know the percent that went -- I know how the categories break out in those that went to BellSouth but the total customers of IDS I don't know anything about them.

Q And I'm only concerned in my question with IDS customers who went to BellSouth.

A Okay, sorry, I hate to do this but ask it again. What was the percent you wanted?

Q I'll try again.

A Of those who went to BellSouth?

Q Of the former IDS customers who went to BellSouth during the time period of your survey would

the percentage of those customers who had resale services with IDS be equal to the percentage that you would obtain by taking the number of customers in the resale group in your survey divided by the total number of customers after the unduplication effort in the total population of your survey?

MR. MEZA: Object. Let's make sure I understand. Are you asking her for those customers that BellSouth reported or that -- that BellSouth reported in this form or this was information given to Ernst & Young or larger than that?

MR. MILLER: I'm asking whether the percentage of IDS customers who went to BellSouth and were resale?

MR. MEZA: And reported by BellSouth?

MR. MILLER: No. The IDS customers who left IDS and went to BellSouth and were resale, is that percentage equal to the percentage of customers in your resale group as opposed to the total population in your survey?

MR. MEZA: Object to the form.

THE WITNESS: I'm not -- I mean if we have the whole group which I understand we do, if we have all of

them, then it seems to me you're asking me is A equal to A, so I'm having trouble answering it.

If you're asking about the sample, was the sample proportionate to the population it was not exactly because we designed to achieve precision rather than to be exactly proportionate.

BY MR. MILLER:

Q I'm asking do you know if the, if the total population consisted of all customers who left IDS and went to BellSouth during the time period of your survey?

A That was my understanding of the population. Not during the time period of the survey, during the time period that we asked about on the survey.

Q Yes, the time period of the customers who left that are comprised in the survey?

A The time period of the survey was about three or four weeks, not during that time period, during the time period that took place during 2000, 2001.

Q Did you do any research to determine whether the total population consisted of all customers who left IDS and went to BellSouth during the time period you were concerned with in the survey?

A If you're asking did we independently verify what we were given, no, we did not.

Q Did you make any effort to determine the length of time that customers in the survey were with IDS before they left for BellSouth?

A We asked them if they had been with IDS for a month or more or for less than a month but not beyond that.

Q So other than the survey question as to whether the customer was with IDS for less than one month or more than one month Ernst & Young did no other investigation as to how long the customers had been with IDS before switching to BellSouth?

A No.

Q No other investigation?

A No, I don't think it would be possible. I don't think we have access to either BellSouth or IDS customer records unless they give them to us.

Q Did Ernst & Young make an effort to insure that the sample was representative of the -- well, let me ask that question again.

Did Ernst & Young take into account the

geographical location of the customer in determining the customers that would form the sample?

A No, when you don't do that, if you sample randomly beyond that you expect most of time to get the same, except in very unlikely cases to get the same approximately the same proportionate representation as is in the population.

Q Did Ernst & Young make any effort to exclude customers who were not located in Florida in conducting the survey?

A No.

Q Did Ernst & Young perform any analysis of business sectors in which the customers operated in determining the sample?

A No, my understanding is that they were primarily small businesses.

Q What is the basis for that understanding?

A When we were trying to determine the sample size the response rates differ by whether it's an individual home or a small business or a large business and we needed to make some sort of adjustment to the sample size to allow for nonresponse. And so in

pursuing that, asking and then also looking at the names of the businesses, asking what types of customers these were, reviewing the names, we were told they were primarily small businesses and that appeared to be the case looking at the names of them and in the surveys themselves.

Q Did you ask in the survey whether the business was a small business?

A No, we did not but we typically didn't have to go through gatekeepers, you know secretaries.

Q Receptionists?

A Receptionists.

Q So that's the basis for your view that the execution of the survey confirmed that most of these customers in the survey were small businesses?

A It's one indicator.

MR. MILLER: Get some water.

(Off the record.)

BY MR. MILLER:

Q During the survey did the interviewers ask any questions of the respondents to verify the representativeness of the sample?

MR. MEZA: Object to the form.

THE WITNESS: No, we depended on the sampling methodology to make it representative.

BY MR. MILLER:

Q How long were the interviewers trained to conduct this survey specifically?

A The specific survey?

Q Yes.

A We used a group of interviewers that is trained on business surveys and they're permanent interviewers and they had just come off another business survey so in this case the survey is very short and simple so there was no need for extensive training. I think they got maybe a couple of hours on the specifics of this, an hour or two, but I don't know exactly. I know it wasn't extensive, though.

Q Did anyone from Ernst & Young participate in that training?

A No.

Q Did anyone from BellSouth participate in that training?

A No.

Q During the one or two-hour training that you mentioned were the interviewers informed what the term slamming means?

A I didn't participate in the training so I don't know what they were told during it. Basically these are permanent interviewers and we rely on the vendor to train them.

Q Did Ernst & Young put any requirements on ORC Macro as to the length of experience of the interviewers actually participating in the survey?

A I don't think we made it a formal requirement. We discussed with them how fast they could do the survey, how quickly could they get it off the ground and started and they told us that if they used, that they would use this executive survey group and they were ready to go. They had been trained on a previous survey and had received extra training in general. This is sort of their better group of interviewers.

Q So you don't know how long?

A So what was your question?

Q My question was whether Ernst & Young imposed any requirements on ORC Macro as to the length of

experience with ORC Macro that the participants, the interviewers, had to have?

A No, we didn't.

Q Did anyone at Ernst & Young serve as an interviewer?

A No.

Q Did anyone at BellSouth serve as an interviewer?

A No.

Q Let me ask you to identify some of the documents that you produced to us yesterday.

A Okay.

Q First, let me hand you a folder that's labeled part two of universe and sample data sent to Macro. What is the information contained in that folder?

A The first piece is a printout of the electronic file that we sent to Macro of the sample and it's identified by its three pieces.

Q And that is the sample in each three groups; is that correct?

A Yes. The next one is a record layout for that. I'm not sure which of these copies it goes to but

it is a record layout. The next one is an Excel version of the first so it's a little more readable.

Q And that document is labeled RB sample, correct?

A Yes, well, yes, there's one for each group. It's Excel or Word, I'm not sure which but it's a more readable file. And then the next one is we had RB, CB and SE.

Q Are those last three documents that you have reviewed a listing of the customers contained in the sample broken down by each of the three groups?

A Yes.

Q Let me ask you, let me see them. Take a look at the right-hand column of the document that's labeled RB sample and in particular look on the last page where it refers to RB-200518, does that refresh your recollection as to how many customers were contained in the RB sample?

A Not really because I don't know, this is a tracking number and I don't know whether, it appears to be in sequence from 1 to 518 so that appears to be the number but --

Q How would I confirm how many customers were contained in the RB sample?

A It's in, there's some tables in some of the material that we gave you.

Q All right. Let me ask you --

A It's in a folder.

Q Let me ask you to look through more of folders later. If you could show that to me I'd appreciate it.

A Okay. Most likely that is what it is.

Q

A

Q Yes.

A

Q What does RB refer to?

A Probably resale but there's some sort of translation somewhere.

Q Yes, I know that there is. I'd like to mark as Exhibit Batcher 2 a document that's labeled BellSouth survey sampling steps.

(Exhibit Number 2 was marked for

identification.)

BY MR. MILLER:

Q Take a moment to familiarize yourself with that, Dr. Batcher.

MS. HELTON: Brian, what are you marking as exhibits?

MR. MILLER: These are documents that I received yesterday, 6 p.m. I don't think you have a copy of them.

MR. MEZA: No, Mary Anne, it's documents that we agreed to produce to IDS for Miss Batcher's deposition.

MS. HELTON: Are we going to be able to get a copy of those?

MR. MEZA: Yeah, unfortunately I just reviewed them yesterday myself and so I will get you a copy as soon as I can.

MS. HELTON: Electronic copies?

MR. MEZA: Some of it is on disk.

THE WITNESS: It could be in either electronic or printed. I would suggest that you may want to get some of it electronically. I think there was one that

we were not able to get into a readable because it was a data file into a readable written form.

MR. MEZA: Yeah, but as soon as I can get back to the office and get organized I will give you a copy.

MS. HELTON: Okay.

BY MR. MILLER:

Q Does Exhibit Batcher 2 refresh your recollection as to what the term RB refers to?

A Yes.

Q What does the term RB refer to?

A Resale.

Q And the term CB?

A Unbundled network elements.

Q And the term SE?

A SE, slammed, customers who had reported they had been slammed.

Q And were these the code names that Ernst & Young assigned to each of the three groups in the total population?

A I don't know if those initials were assigned by us or were on the file when we received it.

Q But in any event these are the code names for

each of the three groups in the total population, right?

A They're the variable names that we used, yes.

Q Variable names. What is Exhibit Batcher 2?

A This.

Q Yes, Exhibit Batcher 2.

A It's a writeup of how we determined the sample size and how we did the sampling.

Q Does Exhibit Batcher 2 indicate the total number of customers in each of the three sample groups?

A It has the population totals and it has the sample sizes, target sample sizes.

Q Where is the population total in exhibit Batcher 2?

A Page 3 of attachment of A. It's attachment A, page 1 but it's page 3 of the document.

Q And where do you see the population size?

A

Q And what is the significance of those numbers?

A They're the population in the three groups.

Q Are those numbers of customers or numbers of lines?

A They should be numbers of customers because they're unduplicated.

Q Attachment A of Exhibit Batcher 2 says the three target unduplicated populations, right?

A Right.

Q How many customers were in the unbundled network element population?

A

Q How many customers were in the resale population?

A

Q How many customers were in the slammed population?

A

Q What were the sample sizes for each of the three groups?

A For unbundled it was resale was slammed is

Q And what is the significance of those numbers?

A Those were the sample sizes that we determined were needed to achieve 95 percent confidence plus or minus 5 within each of those groups. And then there was

an adjustment made assuming a maximum nonresponse rate. And actually, when we assumed the nonresponse rate I believe we weren't sure if these were individual or business customers.

Q Is it fair to say based on Exhibit Batcher 2 that there were customers in the sample within the unbundled network element group?

A Yes.

Q And customers in the resale group within the sample?

A Yes.

Q And customers within the slammed group sample?

A Yes.

Q Why was the sample size for resale only more customers than the unbundled network element group when as indicated on page 3 of Exhibit Batcher 2 the total population for the resale group was compared to customers in the unbundled network elements group?

A Sample size is determined, oddly enough most people think it's based on the population size or assume

it is and it's not. Sample size is based on the number that you need to get a particular confidence and precision. And the way it works is if you have a small population you get, because you're taking such a large amount of the population you don't need to take quite so many but as populations get -- so it's somewhat related.

As populations get bigger you take more of them up to a certain point but once you hit that point you're into -- it doesn't matter if it's 10,000 or infinite number because you don't get that benefit anymore for having a small population. So basically it's modestly dependent on population size but primarily dependent on the variability within and how big a sample you need to get the confidence and precision that you've specified.

Q When the final survey results were tabulated did you reweight the samples to reflect the proportion of each group in the total population?

A Yes, we did.

Q Did the customers in the slammed total population have resale services or unbundled network element services from IDS?

A I don't know.

Q Does anyone at Ernst & Young know that?

A No, I don't think so. I don't think, it may be on the population files. If we searched and played around with them there might be some indication but we haven't done that so I don't know.

Q And in determining the survey methodology did Ernst & Young take into consideration whether the customers in the slammed group had resale services versus unbundled network element services from IDS?

A No, it wasn't really that important, that relevant, because as I said earlier, the reason we did that was to make sure it was spread through the population but I mean, that's why we looked at all groups about but it's more efficient but it's not different from just a simple random sample of everybody, you just need a smaller sample size usually when you stratify like that.

Q Next let me hand you a folder that is labeled survey sample data and SAS programs and ask you to take a minute to review that, please.

A Okay.

Q What is the first document contained in that folder?

A It's a file layout, excuse me, dumped out of SAS and I guess what I'm looking at now, I'm not positive. In some of these things you can recognize case I.D., phone number, master I.D. but the cues I'm not sure. This appears to be and it's got ORC Macro on it so yes, this is the information on what's contained in the file called DLTM.ASC that we received from ORC Macro.

Q Okay, and what is the second document contained in that folder, please?

A It's a data file, our best attempt to print out the data file for the surveys without -- just the raw file without the sort of words around it but the actual data that was in it.

Q And who prepared that file that you attempted to print?

A ORC Macro.

Q It's an electronic file that they gave Ernst & Young?

A Yes, and we printed it in a more legible

content for you in a notebook.

Q The 3-ring binder that you produced contains the same information as the second document in that folder but in a more legible format?

A Yes. We were asked to turn over both data files and output.

Q What is the third document in that folder, please?

A It's another listing of the survey results in another slightly more readable than this but less readable than the folder.

Q Than the 3-ring binder?

A Than the 3-ring binder.

Q And the next document, please?

A This is the SAS program that was used to unduplicate the numbers.

Q That was performed by Ernst & Young?

A Yes.

Q The next document?

A This is the SAS program that was used to assign random numbers for sample selection to generate and assign random numbers.

Q Were the numbers in the sample generated randomly within each group?

A Yes.

Q By computer program?

A Yes.

Q And that's the SAS software?

A Yes.

Q Is that an off-the-shelf software?

MR. MEZA: Object to form.

THE WITNESS: It's a widely used statistical analysis software that you actually license from the SAS Institute in North Carolina.

BY MR. MILLER:

Q And the next document, please?

A Well, it says it wasn't used so I'm not sure. It says read two divides question five into yes and no, so I'm not sure why it says it wasn't used. We'd have to look at the survey but Q5 is probably the question about was it one month, more or less than one month. Let's see what the survey says. Yeah, that's the question. Did you have local telephone service with IDS for at least one month.

Q Did Ernst & Young make any effort to verify the information that survey respondents gave to the interviews regarding whether they had service with IDS for more than or less than one month?

A Independent of their response?

Q Independent of the response from the respondent.

A No, we did not.

Q And the next document in that folder, what is that?

A It appears that there were two SAS programs that are in here but that ultimately were not used to divide these into the yes or no, and then this one would be the one that was actually used.

Q The last document in the folder?

A Yes, the one with the yellow highlighting

Q Okay, if I could have that folder back, please.

A (Witness handing folder back.)

Q Next, let me hand you a folder that is marked survey monitoring surveys. If you could take a moment to review that, please.

A Okay.
Q What information is contained in that folder?
A We asked for updates weekly from the survey results.
Q From ORC Macro?
A From ORC Macro.
Q And did they provide you those results weekly?
A Yes, and so this would be repeated tabulations that we did to see how the survey, what the percent completion rate was and to generate some preliminary estimates. At some point the preliminary estimates that are in my testimony were generated from some of this.
Q Were there any changes made to the survey script during the course of the survey?
A No, there were not.
Q Were there any changes made to the survey methodology during the course of the survey?
A No, there were not.
Q Next let me hand you a folder that's marked Macro script and ask you to identify that, please.
A These are two copies, it looks like a draft and a final, of the script that was -- once we gave

Macro what we thought the survey needed to include and then they programmed it into their systems and this is their program version.

Q That's the script after Macro programmed it into their CATI software and then they provided you with a copy of the script; is that right?

A Well, yes, this is what the programmer would have been given to program. Basically this sort of vanishes once it's in the software because what the interviewer sees is sort of their script and then this skip pattern that says go to intro one, for instance, it just pops up intro one, so it's really a virtual --

Q Is the CATI software standard in the surveying industry?

A Yes, if you're asking me is it commonly and standardly used?

Q Is it commonly used by telephone surveyors?

A It's not a particular brand of software, it's a methodology and yes, it is commonly used by survey, telephone survey interviewers.

Q Next let me hand you a folder that's marked as Macro and ask you to review that, please.

MR. MEZA: Regarding these documents, if you get into anything specific we have an agreement with Macro that we will treat this as confidential.

BY MR. MILLER:

Q Ask you to identify the documents in that folder, please.

A This is the material that Macro gave we when we asked them to provide us with their training material, and any other aids that were used by the interviewers.

Q What training material did you ask Macro to provide to you?

A We asked them to provide us with the training that their interviewers that were given, that our interviewers were given.

Q Did you ask for training documents specific to the BellSouth survey?

A We asked for whatever these interviewers had been given and it would have included -- and job aid so it would have included the training that they, all of the training they received from beginning to end, including any material that they had for the BellSouth

survey which is at the end, appears to be at the end.

Q My question was did you ask ORC Macro to provide you with training materials specific to the BellSouth survey?

A Yes, plus other training materials.

Q And which pages in the training manual are the training materials specific to the BellSouth survey?

A They don't have page numbers on them, I don't think.

Q What answer were the interviewers instructed to give to the question who is sponsoring the survey?

A

Q

A

Q

A

Q Did you provide any input into that portion of the ORC Macro training manual?

A Not directly. We gave them guidelines, we told them -- as I told you before we didn't tell them who the ultimate customer was and so they drafted what they knew to be true which is that Ernst & Young was the contractor, I mean had contracted with them.

Q Did anyone at Ernst & Young review any drafts of the Macro training manual?

A No, we rely on them to train their own interviewers.

Q Who drafted the portion of the script used by the interviewers that referred to Ernst & Young as a major audit firm?

A I don't, if it was in the draft we sent we probably did, if it was in -- if it appeared after they probably did.

Q Why did -- strike that.

Let me next hand you a Redweld that is labeled unduplicated population files and original population file from BellSouth and ask you to identify that for if record, please.

A The first rubber band piece within the big rubber band is the original universe that's got a label on it that's RB.

Q Which again what does that refer to?

A Resale. The second one that has a clip on it and it's CB from, again, the original files of the original files received from BellSouth.

Q And the first document that you looked at, the RB total population, that's a document that Ernst & Young received from BellSouth?

A Not the document. We received the electronic file and then we printed this out so that you would have something on paper, a nonelectronic version.

Q Does the printout reflect the same information contained in the electronic file that you received from BellSouth?

A Yes.

Q Okay, I'm sorry, go on after the CB universe

what is the next documents?

A After CB it's another one that says SE.

Q Again, is that a printout of an electronic file given to Ernst & Young by BellSouth?

A Yes, it may be reformatted somewhat to make it more readable.

Q Did you make any changes to the information from what information BellSouth originally provided to Ernst & Young?

A No.

Q And after the SE sample what is the next document?

A It looks like the same thing in another format, slightly different format.

Q Again, it's a printout of the electronic files provided to Ernst & Young by BellSouth containing the total population?

A Yes, it's possible that one of these is an ASCII printout and one is a SAS as or something like that or an Excel and an ASCII but typically we would try to give it, when you ask these guys to give us everything they have if they've got two versions of the

file you're going to get both versions, one is ASCII, one is SAS, one is Excel, something like that.

Q Who are these guys you're referring to?

A My staff.

Q Ernst & Young personnel?

A Yes. And again, it looks like we have a broken rubber band in there so this one was probably put together into one, so this should not have been in there. This is not relevant, it's another client that got scooped up.

Q I didn't see it.

A Okay. It got caught up in the general packaging of these things. Okay, and this is the same thing, SE population.

Q Different format of the information that was previously contained in that Redweld?

A Right, and the same thing for CB, yeah.

Q And these three last printouts that you pulled out of the Redweld, again, those are information printed from the files obtained by Ernst & Young from BellSouth?

A Yes, but let me correct it. I just looked at the cover note on it. One of these is the original

population, one is the unduplicated population.

Q Which is which?

A The ones that say original universe on the little stickies I can verify this but I would say this is the original, the one that says original on it, and the other that just says population is the unduplicated.

MR. MEZA: Just to make sure the record is clear, the first three that you referenced would be the original.

THE WITNESS: Yes, and they each have stickies on them that say original universe.

BY MR. MILLER:

Q And the latter three printouts are the unduplicated versions of each universe?

A Right.

Q Total population, correct?

A Uh-huh, yes.

Q Let me just identify these two more things and then we'll finish identifying.

Next let me hand you a folder that's marked e-mails, ask you to identify that, please.

A Those are printouts of the e-mails that we

exchanged among ourselves with BellSouth and with the vendor relative to designing and fielding this survey.

Q The BellSouth survey?

A Yes.

Q Last let me hand you a 3-ring binder that's marked BellSouth survey responses 568 total response September 2001 and ask you to identify that, and just for record, I will note that I've pulled some pages out of here already so this will not contain all of the pages in the original binder but I'm just looking for you to identify in general what the binder represents, please.

MR. MEZA: Brian, the markings, is that where a page is missing?

MR. MILLER: That's correct.

MR. MEZA: Okay.

THE WITNESS: Well, these are our best attempt. I mean, these two print out the actual verbatim of the surveys so it's a little messy to read but I think it's readable and it includes everything that the respondent said, that was captured.

BY MR. MILLER:

Q Who provided these printouts to Ernst & Young?
A Macro gave them to us electronically and we printed them.
Q So the 3-ring binder is a printout of electronic files that Macro provided to Ernst & Young containing all of the 568 survey responses?
A Yes, they're not the data files that we looked at earlier, they're the, we went back and asked them so that we could turn this over to you not just for the data but for the, as close as they could get to a completed survey instrument so this comes out of their software that collects the data.
Q Do the printouts in the 3-ring binder contain all information captured by the ORC Macro interviewers from the respondents during the survey?
A Yes.
MR. MILLER: All right, do you want to take a break now, maybe ten minutes?
THE WITNESS: Sure.
MR. MILLER: Off the record.
(Brief recess.)
BY MR. MILLER:

Q Back on the record.

Who at BellSouth determined which lines would make up the total population for this survey?

A I don't know.

Q Who at BellSouth determined which customers should be assigned to the three groups being resale, UNE or slammed?

A I don't know.

Q Did you ever ask BellSouth who determined which lines would make up the total population?

A No, that wasn't particularly relevant for the survey.

Q Did you ever ask anyone at BellSouth how the breakdown between the three groups was determined?

A I think I already told you that, I think they reported that to us when they gave it to us.

Q Did they report that to you in writing?

A There may be some general description in one of the e-mails but other than that, no.

Q And other than the reporting from BellSouth to you of what each group represented did Ernst & Young ask any questions of BellSouth how the members of the groups

were determined?

A No because again, for survey purposes we were going to ask from all three groups so it wasn't that essential for us to get really refined descriptions.

Q Did Ernst & Young produce to IDS in the documents that I received yesterday any calculation reflecting the reweighting of the three groups to determine the final survey results?

A Those results, those monitoring results, had both an unweighted and a weighted total, an unweighted for each group and an overall weighted total and then also in the writeup of the sampling steps there was a description of how the weighting was done. Unfortunately, it's in mathematical form but it's there.

Q And is the description of how the reweighting was to be done contained in the writeup of the methodology, the actual process that was used to perform the reweighting?

A Yes.

Q Let me mark that for you. Is that contained in Exhibit Batcher 2?

A Yes.

Q On what page?

A I think, wait a minute, let me look at it. Yes, on page five of.

Q Page five of Exhibit Batcher 2?

A Uh-huh.

Q Let me mark as Exhibit Batcher 3 a document titled telephone script design notes for switching local telephone service providers dated August 24, '01.

(Exhibit Number 3 was marked for identification.)

BY MR. MILLER:

Q Can you identify Exhibit Batcher 3 for me, please?

A Yes, that's Rob Wederich, our survey design person's notes on his recommendations for the, or his description of the survey instrument and how it should be used and then attached to that are different drafts of the survey.

Q Is Exhibit Batcher 3 Mr. Wederich's recommendations or is it a description of how the survey was actually conducted?

A Well, because of the tense, it's a description

of I think what his recommendations had been. He didn't go to verify that the survey was conducted that way but it was what his instructions were and how he designed it.

Q Did anyone from Ernst & Young go to verify that the survey was conducted in accordance with the specifications?

A No. As I said before we've used this vendor quite a bit so we've always had good luck and didn't feel it was necessary to stand over them, or good experiences, I should say.

Q Was there any effort made in formulating the survey results to check for inconsistent responses to different questions in the survey?

A Not that I'm aware of. I was just trying to remember, there were questions that would lend themselves to that. We did some coding checks but I'm not sure the questions even, they may, I just don't remember whether the questions lend themselves to consistency checks. To the extent that there are consistency checks directly from the survey they're generally built into CATI systems and I haven't, I don't

know if they were in this case.

Q What do you mean when you refer to consistency checks, just so I make sure I understand you?

A Well, for instance if you ask people how much did you spend on A, how much did you spend on B and how much did you spend on C and then overall what is your total, those should add up and so if they don't in a CATI survey there's an instant check and they can go back and verify that these are indeed correct.

Q In the survey that was performed for BellSouth that's the subject of your testimony were there any consistency checks used by ORC Macro within their CATI system?

A I'm not sure, that's why I was trying to remember the questions, I don't think the questions lend themselves to that so I'm not sure that there is much of a way to do consistency checks. I do know that they monitor their interviewers on a sample basis.

Q Are you aware of any consistency checks that ORC Macro imposed through their CATI system in the survey?

A No.

Q Are you aware of any consistency checks that Ernst & Young imposed on ORC Macro for them to implement through their CATI system for this survey?

A I wouldn't necessarily call it a consistency check but we did ask them to verify that they were speaking to the right person and verify the phone number.

Q Any other verification efforts that you asked ORC Macro to perform?

A I don't think so.

Q Were there any other verification or consistency checks performed by Ernst & Young in tabulating the results?

A They tabulated the result, well, they gave us the data file, we tabulated.

Q They meaning ORC Macro?

A ORC Macro, yes. We did review a few of the surveys to see if there had been major problems with missing items or things like that.

Q Did you only check for missing items?

A We checked to see if they captured all the reasons that were given, primarily.

Q And what was the result of that check?

A I had a couple of staff people do that and I believe they had 13 out of 560 where they thought perhaps a response might have been missed. I haven't looked at all of those. Some of them that I looked at, though, it seemed it was more of an elaboration than a second reason.

Q Did these personnel under your direction review all 568 responses?

A Yes.

Q And do you have any reason to believe that any of the 568 responses are invalid as a result of that process?

A No because what I asked them to do was to make sure that because that all of the reasons, or to see whether all of the reasons had been captured when they said why did you switch because when people are speaking they sometimes dump out several reasons and in this case that was a fairly focused review. They only found, like I said, I think it was 13 maybe, and of those I looked at some of them and in some cases they had missed a second or third reason but in others it was really an

elaboration of I switched and this is why and then let me tell you some more about it and it was all expanding the detail. So I would not consider that a reason missed but in any case even if it was all 13 or 14 out of merely 600 that doesn't invalidate the survey.

Q Do you know of any other reason why any of the individual results of the 568 would be invalid?

A No.

Q Were the interviewers at ORC Macro instructed to check multiple responses if a respondent gave answers to a question that would fall into more than one category of the precoded responses?

A Yes, they were instructed to code first response, second response and third response and as many as were needed.

Q Was it limited to three?

A No, it was as many as were needed.

Q Did the interviewers from ORC Macro in fact carry out those instructions?

A Yes, because we have some codings of second reasons. We didn't get any codings of third responses and didn't find any except one, I believe, when we did

that review but that was why we did the review, to see if they had indeed picked up the responses.

Q Did the ORC Macro interviewers pick up multiple responses for all questions or only selected questions in the survey?

A Only selected questions.

Q Which questions?

A I think it might have only been that one but let me check the survey. There were only two questions on the survey where we asked why, the other questions were did you, yes or no kind of thing. The first one for sure we instructed them to code multiple responses. I'll verify on the second one which was if you received a call from a BellSouth representative what kinds of things did the rep say that influenced your decision to change. And I would have to, I'll have to check to see whether we picked that up. We did capture the verbatim responses on those, though.

Q Just so the record is clear, which is the question for which you are sure that ORC Macro noted multiple responses?

A "Try to remember back to the month and year

that they switched. Could you please tell us the reasons as to why you switched your local telephone service from IDS to BellSouth at this time."

Q Do you know whether the ORC Macro interviewers noted multiple responses in answer to the question QZ, what kind of things did the rep say that influenced your decision?

A That's the one I would have to check on.

Q So you don't know whether they --

A I don't know at this time, I don't recall.

Q Let me mark as Exhibit Batcher 4 a series of selected responses from the 3-ring binder that was produced by Ernst & Young yesterday.

(Exhibit Number 4 was marked for identification.)

BY MR. MILLER:

Q Take a minute to familiarize yourself with that. Can you identify those pages for me?

A They are selected pages from the series of interviews, from the printout of the survey responses.

Q The selected pages from the printout of the survey responses that Ernst & Young obtained from ORC

Macro?

A Yes.

Q Let me ask you to take a look at Exhibit Batcher 1, your testimony, and I'd like to direct your attention to page 3, lines 19 through 22, please. If you could read for the record the sentence that begins, "I will provide"?

A "I will provide this information in some detail later in my testimony but what stands out is that almost 29 percent of the respondents reported that they had been slammed by IDS or moved to IDS without their permission."

Q Did the customers contained in your 29 percent figure on page 3, line 21 use the word slammed in speaking with the interviews from ORC Macro?

A They may have, I don't know.

Q Is this 29 percent figure on page 3, line 21, the first statistic that you summarized in your testimony?

A Say that again. Is that the first time I mentioned statistics?

Q Yes.

A It appears to be, yes.

Q Let me ask you to take a look at Exhibit Batcher 4.

A Okay.

Q The first page labeled at the top case I.D. 00002, do you see that?

A Yes.

Q And for purposes of my question would it be fair for me to refer to this as customer two?

A Well, there was no customer one so this was the first one, customer two.

Q Why was there no customer one?

A I don't know, it may have been that customer one was a bad number, something like the first attempt that they made was a bad number.

Q If you could look about halfway down the response of customer two and this is the response to Q6, it appears to be.

A Yes.

Q Can you read that response, please?

A I was switched from IDS to BellSouth without my approval.

Q Would customer two be included among the 29 percent of respondents who reported that they had been slammed by IDS as stated on page 3, line 21 of your testimony?

A Yes.

Q Let me ask you to take a look at eight lines down from the response that you just read.

A "Were there additional reasons in response to that"?

Q Yes, the response to the question, "were there additional reasons as to why you switched from IDS to BellSouth." Can you read that response, please?

A They took down all my voice mail, really upset with IDS, lost three days worth of business, lied about saving all this money, billed two months in one, all misrepresentation, BellSouth a little higher, a little but higher, I think it's probably supposed to be bit, but not liars.

Q Is it fair to say that this customer number two reported to the survey that they took down all my voice mail, really upset with IDS, lost three days worth of business?

A Yes, after they were asked were there additional reasons.

Q Do you consider it inconsistent to conclude that this customer number two was switched from IDS. Actually, I'm not going to ask that question because I misread what the customer said. This customer reported that he or she was switched from IDS to BellSouth without their approval; is that correct?

A Yes.

Q So would that change your answer to my earlier question as to whether customer number two was contained within the 29 percent of respondents who claimed they were slammed by IDS?

A Yes, it would. I also misread it.

Q Would you conclude based on this answer that customer number two was slammed by BellSouth?

A Yes.

Q In the initial survey results that are marked as Exhibit Batcher 1, what percent of customers in the survey reported being slammed by BellSouth? In other words, changed from IDS to BellSouth without their approval?

A 6.6 percent.

Q Did the fact that 6.6 percent of the respondents in your survey reported being slammed by BellSouth rather than IDS give Ernst & Young any reason to question the validity of the survey results?

A No. In fact, if anything, it strengthened because it meant that we were getting both sides, we were hearing from customers who said they were slammed by IDS but we were also hearing some that said they were slammed by IDS which said to me that we certainly were not seeking out only information that was damaging to IDS, you know, that we had been given good data and that the survey had been asked in a way that was fair.

Q Was customer number two asked any followup questions from if survey questions regarding better service based on customer number two's reporting that the customer lost all voice mail, really upset with IDS, lost three days worth of business?

MR. MEZA: Object to the form. Are you asking her to read the script?

BY MR. MILLER:

Q No, I'm asking did the interviewer ask

customer number two any followup questions regarding the better service items in the survey script after hearing the response from customer number two that customer number two had lost all voice mail?

A No, not according to this script they didn't.

Q Let me ask you to look at page 4 of Exhibit Batcher 4, please. The case I.D. is 00006.

A Okay.

Q What was customer number six's first response to question 6, "could you please tell us the reasons to why you switched your local service from IDS to BellSouth"?

A It was better service.

Q And if you look at the top of page 5 in answer to the question 8, what other aspects of the service in particular encouraged you to switch, what did customer 6 report?

A Customer couldn't get DSL service without all lines.

Q Did customer number six report receiving any calls from BellSouth representatives?

A Yes.

Q And according to Exhibit Batcher 4 what did customer six report was said by the BellSouth representatives who called customer number six?

A That BellSouth required all lines but couldn't get DSL without giving up all lines.

Q Let me ask you to look at page 7 and 8, case I.D. number 10, how long did customer number ten report being with IDS before switching to BellSouth?

A Less than one month.

Q Less than one month?

A Well, the question is, "did you have local telephone service with IDS for at least one month before switching," and the response was no.

Q So customer number ten reported being with IDS for less than one month, right?

A Yes.

Q Did customer number ten report receiving any calls from BellSouth representatives?

A Yes.

Q What did customer number ten report to the survey course regarding what was said by the BellSouth representatives?

A BellSouth called and said you changed and I called and changed it back to BellSouth.

Q Ask you to take a look at page 114, customer number 132. Hopefully I'll get the order of the words right this time. Did customer number 132 report being slammed by IDS?

A They reported that they were switched from BellSouth to IDS without their approval, which I guess is slammed.

Q From BellSouth to IDS?

A Yes.

Q So would customer number 132 be included within the 29 percent of respondents who reported that they had been slammed as mentioned on page 3, line 21 of your testimony?

A Yes, if they had been a respondent at that time.

Q Okay. Would customer number 132 be included within the percentage of customers who reported that they were switched from BellSouth to IDS without their approval in the final survey results?

A Yes.

Q Did customer 132 report any additional reasons for switching from IDS to BellSouth?

A Yes.

Q What additional reason did customer 132 provide for being, I'm sorry, for switching from IDS to BellSouth?

A "It changed my call forwarding service."

Q And customer 132 stated it changed my call forwarding service in response to what question?

A "Could you tell us any more information about how this unauthorized change of service took place."

Q Do you consider that response, "it changed my call forwarding service to be responsive to the question, could you tell us any more information about how this unauthorized change of service took place"?

A I would consider that as a response to really, not really responsive no. I would view that as perhaps adding another reason but not responding to that question.

Q Does the fact that customer 132 reported that, "it changed my call forwarding service," give you any reason to doubt whether customer 132 should be included

within the percentage of people who were switched from BellSouth to IDS without approval?

A No, it doesn't because those are -- those 29 percent that were switched without approval, those are, that was their first response that they gave and then we collected additional responses for a smaller portion of people.

Q Ask you on that same page to look at customer 133 and continuing on to the next page.

A Okay.

Q Actualiy, I'm not going to ask you any questions about customer number 133. Ask you to take a look at page 172, customer 198.

A Okay.

Q How long did customer 198 report having local telephone service with IDS?

A Less than, or one month or less.

Q One month or less?

A Yes, or less than one month. They said no, they had not had it for at least one month.

Q Did customer 198 report any service issues as influencing the decision to switch from IDS to

BellSouth?

A Yes, they said their reason was better service, their first reason.

Q And did customer 198 elaborate on the response, better service?

A Yes.

Q What was customer 198's elaboration?

A When asked were there additional reasons why they switched they said yes, and the reason, the additional reason, was they misrepresented themselves saying they are affiliated with BellSouth.

Q And what the next question, Q8?

A Q8, "Could you elaborate on what aspects of the service in particular encouraged toy switch." The response, "phone service was not working with IDS, i.e., no dial tone." And then they were asked again were there additional aspects and never, the response is Never would have switched if she had known who IDS was.

Q So the service, the aspect of service in particular that encouraged customer 198 to switch was reported as phone service was not working with IDS, no dial tone; is that correct, in answer to question 8?

A Question 8, there's two answers to question 8.
Q The first one?
A The first answer was the phone service was not working with IDS.
Q Right. Let me ask you the last question to this one, customer number 307 on page 370. Did customer 307 report being slammed by IDS?
A No. Sorry, it took a while.
Q How long did customer 307 have service with IDS?
A Less than a month, a month or less.
Q Let me ask to you take a look at question 6, "Were there additional reasons as to why you switched from IDS to BellSouth." The first response was yes and then what was the second response from customer 307?
A "They messed up the fax line and then put a block on my phone so I couldn't receive collect calls and voice mail."
Q And did customer 307 elaborate on what aspects of the service in particular encouraged that customer to switch?
A Yes, there response was, "Phone features,

e.g., call waiting, call hunting were more reliable or better with BellSouth." And then there was another one too.

Q In response to question 8?

A Uh-huh.

Q What was the additional response?

A I'm sorry, no, that's specific features, specify feature, no VM, block on long distance. And then there was more. "Were there additional aspects of the service which prompted you to switch"? "I had good service with BellSouth but the rates were too high and IDS said they would lower the rates."

Q Okay. Do you have any reason to doubt the veracity of the statements provided by survey respondents as reflected in Exhibit Batcher 4?

A No.

Q Let me mark and then we'll turn to your testimony as Exhibit Batcher 5, a letter from Mr. Meza to me dated September 14, 2001.

(Exhibit Number 5 was marked for identification.)

BY MR. MILLER:

Q Can you please identify Exhibit Batcher 5?

A Those are our final survey numbers.

Q These are the final results of the Ernst & Young survey?

A Yes.

Q Reflecting the 568 respondents?

A Yes.

Q Let me ask you to turn back to Exhibit Batcher 1, your testimony, please?

A Okay.

Q I'm going to ask you some specific questions regarding your testimony. First, page 3, line 11, towards the end you state, "Responses were coded into categories, including better pricing, better service, reaction to slamming and brand image"?

A Uh-huh.

Q Who decided on those categories?

A I explained that we had, they had been, we got some initial general information about what the survey needed to find from Doug Lackey, then we among ourselves thought up categories and then the one about line quality, noise on the line or line quality, was dropped

as part of BellSouth's review.

Q What were the interviewers instructed to do if a response from a respondent did not fall neatly within any of these categories that you identified?

A There was an "other" category.

Q What percentage of the respondents reported an other reason for switching from IDS to BellSouth?

A Ten percent reported other and 3.2 percent reported they didn't know or couldn't remember.

Q On page 4, line 5 you testified that 20 percent left because of the pricing that BellSouth offered them, at least with respect to the preliminary results, right?

A Right.

Q Did Ernst & Young make any effort to determine when the customers who reported leaving because of BellSouth better pricing actually left IDS for BellSouth?

MR. MEZA: Object to the form.

THE WITNESS: There is a -- we have -- no, we didn't. I was trying to remember whether they have dates on the file, switching dates, but we didn't ask

them specifically when they left and there may or may not be a date of switch on the file.

BY MR. MILLER:

Q Are any of the customers within the 20 percent who left, who reported leaving because of pricing that BellSouth offered them, included in the percentage of customers who reported being slammed by IDS?

A Would you repeat that, I'm sorry.

Q Are any of the customers who reported leaving because of the pricing that BellSouth offered them also included in the percentage of customers who reported being slammed by IDS?

A No because we coded reason one, reason two, reason three, and these results are all reason one results so there would not, they wouldn't be multiply counted.

Q What do you mean by reason one results?

A That the tabulations here are of what the customer reported as their first reason for switching. In response to the question why did you switch, that was the first thing out of their mouth.

Q So if a customer were coded into switching

because they reported being slammed by IDS as their first response and later reported leaving because of pricing that BellSouth offered them how would that customer be included within the survey results?

A As a slammed customer.

Q And not as a customer who left because of better pricing?

A That's correct. We looked at the separate tabs for response two but they were so few that gave a second response that we didn't include them so they were very small numbers.

Q Page 4, line 16, lines 15 and 16, states, "Almost 77 percent of the respondents reported receiving no call from a BellSouth representative"?

A Yes.

Q Was BellSouth representative defined in the survey?

A You would have to look at the training materials to see if there was any elaboration, it was not defined in the question itself. It seems to me fairly obviously or intuitively obvious what a representative of company means.

Q Page 5, excuse me, line 8, you discuss the population of more than 13,000 telephone customers, do you see that?

A Yes.

Q Did anyone from BellSouth ever tell Ernst & Young that IDS has stated that it has lost 37,000 customers as opposed to 13,000?

A No.

Q Page five, line 23 and carrying over to, I'm sorry, page 6 line 1, in that portion of your testimony you discuss the percent of customers who had been with IDS for more than one month; is that right?

A The part that starts on page 5 and continues on page 6 is more than a month, yes.

Q Did the study make any effort to determine how long the customers who reported being with IDS for more than one month actually had service with IDS? In other words, did the survey attempt to determine the exact length of time that a customer was with IDS.

A No, we did not ask that.

Q Page 6 line 21 you state at the end of that line, "We received 77 statements," correct?

A Yes.
Q What are these statements that you're referring to on that line?
A If you look at the survey where it says for those respondents who said yes, they had received a call they were asked what kinds of things did the rep say that influenced your decision. And they, the respondent's entered as much verbatim as they could and those are those verbatim responses to that question.
Q Do I have the 77 statements that you're referring to on page 6, line 21?
A It's in that material.
Q Would those be contained in the 3-ring binder?
A Not pulled out separately but yes, if you read every question you would find that they are in there. We do have some easier to follow tabulations and summaries where we've pulled them out individually.
Q On page 6, line 22 you state, "No statements were received indicating a BellSouth representative made a derogatory statement about IDS," correct?
A Yes.
Q Who determined what constitutes a derogatory

statement about IDS?

A We did. We looked at, we read the 77 statements and concluded based on our read that they were not derogatory.

Q Did the surveyors ask customers whether BellSouth representatives stated that IDS was going bankrupt?

A Did it specifically ask that?

Q That's correct, did they ask --

A I don't think so.

Q -- any of the respondents whether a BellSouth representative stated that IDS was going bankrupt?

A No because that would have been leading. They were asked what kinds of things did the, did the BellSouth reps say and allowed to say what they wanted to say. They were not given specific categories to avoid putting words in their mouth.

Q On page 9, lines 1 through 6, you discuss your view that there is no way that ORC Macro could be sure whether BellSouth or IDS was a sponsor of the study, correct?

A That's correct.

Q And at the end of that paragraph you state, "For example, we provided responses to cover both possibilities that a customer could be slammed by either IDS or BellSouth"?

A Right.

Q And before that you state, "Some multiple response choices were added to help hide the identity of the survey sponsor and make the survey appear as open as possible."

A Yes.

Q Other than the response to cover both possibilities that a customer could be slammed by IDS or BellSouth, what multiple response choices were added to help hide the identity of the survey sponsor?

A I don't think any were added specifically for that purpose, we just tried to get all of the categories that we could think of.

Q Did you think of asking as a category whether the customer encountered problems with their telephone service during the conversion from BellSouth to IDS?

A No.

Q Before the switch back?

MR. MEZA: Object to the form. I don't think you have a foundation for conversion.

BY MR. MILLER:

Q You can answer.

A No.

Q On page 9, line 8, you state, "Once the correct contact was confirmed," do you see that?

A Yes.

Q What effort did the survey take to insure that the correct contact at the respondent was confirmed?

A The survey asked, first of all, is this the correct business. And is this -- no, that was just if it's a business. Then it said, "I'd like to speak with the person who makes decisions regarding your telephone service."

Q Did the survey ask to speak with the person who made the decision in fact to switch from IDS to BellSouth?

A Specifically, no. Again, this is, it may have cued the respondent but it, it simply asked for who made the decision.

Q If a respondent reported that the person who

made phone decisions at that time is no longer with the company would the, did the interviewers go on with the interview or did they terminate the interview with respect to such a customer?

A They terminated.

Q And are terminated interviews reflected within the 568 responses, in that type of terminated interview would that be reflected in the 568 responses?

A No, it shouldn't have been. I can double check that but no, my understanding is that it's not.

Q On page 9, line 16, you state, "Only where respondents had difficulty answering a question were they offered some possible response choices to help jog their memory," do you see that?

A Yes.

Q Are the possible response choices that the respondents were offered to help job jog their memory contained in the script that's attached to Exhibit Batcher 1?

A The possible, yeah, I think they are. Yes, and they were instructed to randomize the order and just read through these.

Q Can you point to me an example of where these prompts that you're referring to are in the survey that's attached to Exhibit Batcher 1?

A It's not -- in the specific question it says, "Let respondent, talk do not read, elicit response if needed, mark best choice below." But the instructions that were given to the interviewers, that we gave Macro were, so these were our instructions to Macro that only if the person couldn't come up with any kind of a reason then they were asked to in a random order read the categories.

Q Who determined the random order?

A I'm sorry, not a random order, in a rotating order.

Q Can you explain what you mean by a rotating order, please?

A Each time start with a different, you know, if you start with the first one, next time you start with the second, the next time you start with a third.

Q Each individual interviewer would do this rotation?

A It would have come up on the computer screen.

Q Did the computer perform the rotations?

A Yes, when rotations are done, they're done, I believe. I'd have to verify that.

Q So you don't know for sure?

A I don't know for sure.

Q On page 10, line 9 you state, The script was designed to obtain an honest, as honest a response as possible?

A Yes.

Q Were the respondents under oath when they answered questions?

A No. I'm not sure we would have had much of a response rates.

Q On page 10, actually page 11, line five, in your testimony you stated, "Interviewers are provided with a training manual." Has Ernst & Young produced the training manual that you're referring to on page 11, line 5 to IDS?

A It's my understanding that we have. I have to depend on Macro but I said please give us everything that the interviewers were provided with.

Q And on page 11, line 9, you state,

"Interviewers also had access to a manual which contains a review of refusal conversion techniques"?

A Yes.

Q Has that manual been produced?

A It's my understanding that it has.

Q Page 12, line 1, you state, "In accordance with Ernst & Young instruction, the disposition of each call attempt is recorded for all of the records in the sample."

A Yes.

Q Has Ernst & Young produced any documents reflecting the disposition of each call attempt as referred to on page 12, lines 1 and 2?

A Yes.

Q Where is that contained within the documents that were produced?

A There was a table somewhere in those documents with the results tables that included a summary of the dispositions.

Q If I could hand you the folder that's labeled survey monitoring tables and ask you if you can point that out to me, please.

A It's right here (indicating).
Q The last two pages in this folder?
A Yes.
Q Thank you. On page 12, lines 14 through 17, you state, "By making the sample sufficiently large and keeping the nonresponse as small as possible and unrelated to the survey outcome, we prevent the sample and survey responses from being biased." What do you mean by your statement unrelated to the survey outcome?
A That means that you, that people who don't respond are not, are not more likely to be in one category or another, that the nonrespondents are basically randomly or, yeah, randomly spread across the different categories of questions.
Q Across the three groups or across the different questions within the survey? I'm not sure I understand this.
A Well, the survey outcome and so if it's any of the outcome questions it's that they're not all in one reason grouping or all people who spoke to a representative.
Q Was the only way in which you attempted to

make the nonresponse unrelated to the survey outcome by making the sample sufficiently large?

A No, it's primarily -- the main way you deal with that concern is by working to keep the response rate as high as possible.

Q And how do you keep the response rate as high as possible?

A By doing call backs, by, in a general sense which we didn't do here but by offering incentives, by doing repeated -- the main reason is, the main vehicle is short, well-designed survey and repeated attempts.

Q So what efforts actually were undertaken in this survey to keep the nonresponse rate as small as possible?

A The short survey. It was, I doubt that it took five minutes. I don't know exactly how long it took but it didn't take very long and the repeat attempts. We required up to a maximum of 15 attempts for each number before a call was dropped. We didn't substitute if they couldn't reach somebody, we made them keep going back.

Q Any other ways in which you attempted to keep

the nonresponse rate as small as possible?

A Telephone, short telephone surveys, if you can get through tend to have a pretty good response rate because you've already got them on the line rather than a mail survey. It depends on the length and complexity of the survey. For a short survey like this, telephone surveys tend to have better response rates.

Q So were there any other methods that you used to keep the nonresponse rate as small as possible?

A Not that I can think of off the top.

Q Is the nonresponse rate different from the rejection rate?

A It depends on how you calculate it.

Q How did you calculate it in this survey?

A We calculated it both ways. If you simply, is it different in the sense that you have, if you look at those categories there's some that are out of scope, some that we were never able the reach, some that responded and some that refused and those are the four areas and it's how you put them together. Out of scope should never had been included in the first place so those are the taken out of the base, out of everything,

set of aside. Then the question becomes how do you deal with the people that you could never get through to, you got a busy signal even though you tried 15 times scattered throughout the day, different schedules, different days. And if you calculated, if you just simply set them aside and ignore them and that's assuming they were in a sense equivalent to assuming they were all out scope, some people do that, in this case we proportionately allocated those max attempts to the other categories.

Q What does out of scope mean?

A Out of scope means that the number is, it's listed on the bottom of some of those categories but it's a, they need a new number. I'm not even sure what that means but it's not a good number. They, the business is no longer operating, something of that sort.

Q As opposed to simply not answering the phone?

A Yes. Not answering the phone is not included as out of scope.

Q And in what category is not answering the phone included?

A Max attempts, 15 or more attempts and never

reached a respondent or up to 15 attempts.

Q Did you consider the response rate that you actually obtained in the survey to be reasonable?

A Yes, I did.

Q Turning back to page 12, lines 14 through 17 stated that by making the sample sufficiently large and keeping the nonresponse as small as possible and unrelated to the survey outcome you prevent the sampling survey responses from being biased.

A Yes.

Q Is that the only way to prevent the sample and survey responses from being biased?

A No, this question was how does sampling reduce bias. The main way do keep the survey from being biased is in the design of the survey itself, in the way the questions are asked, and then keeping nonresponse low.

Q On page 13, lines 5 through 8, you state that, "Experience suggests that one-third of the interviews from a well-managed sample will be completed on the first attempt, one-third on the second, and one-third on the third attempt. A small but important fraction of survey targets will require five or more attempts."

A Right.

Q Was that your actual experience in this survey?

A I haven't compared, this is a general statement, I have not compared to see how many call attempts were needed to reach different portions. Given that it's a business survey it may have taken more.

Q On page 14 line 8 you're discussing the CATI system, you state, "There is a special set-up facility," what does that refer to?

A The CATI program that has that capability to schedule the call backs.

Q And on page 14, line 13 through 17, you describe Macros nonresponse conversion staff --

A Yes.

Q -- who call back refusals.

A Yes.

Q

A

Q

A

Q On page 14, line 21 you state, "Yes, the preliminary survey results are valid." Do you see that?

A Yes.

Q Are the final survey results contained in Exhibit Batcher 5 also valid?

A Yes.

Q Are there any bases for your conclusion that the survey results are valid that are not described in your testimony, Exhibit Batcher 1?

A I didn't, it looks like I didn't discuss the sampling. I think the sampling is another reason.

Q Have we discussed that this morning?

A Yes.

Q Any other bases?

A I don't think so. I guess I would include the

weighting of responses and all of that to get correct estimates as part of the sampling.

Q That would be the methodology described in Exhibit Batcher 2; is that correct?

A Let me make check the answer to make sure we got the right number but in general if it's the right one, yes.

Q On page 14, line 22 through 15, line 1, you state, "For most response breakdowns the size of the plus minus factor around the estimate is reasonable."

A Yes.

Q What do you consider to be a reasonable plus or minus factor?

A It depends on your purpose, and a purpose where you have a lot at stake we typically design for plus or minus 5 percent.

Q What did you consider to be a reasonable plus or minus factor for this survey?

A Plus or minus 5 or less and most of these are less.

Q What does it mean if the plus or minus factor around the estimate is not reasonable?

A Reasonable is kind of a value-laden word but if it's not reasonable, meaning it's huge, it means you can't have a lot of, there's not a lot of precision there. Essentially if you construct the confidence interval, if it goes from 1 percent to 40 percent you're not going to have a great, it's not a terribly reliable estimate because it could be anywhere in there and that's just not precise enough for most purposes.

Q If you could turn to your Exhibit 1 of your testimony which is the survey script.

A Uh-huh.

Q I just have a few questions about that. Toward the bottom of the page there's a question in month, year you switched your local telephone service?

A Yes.

Q Why did the survey inform the customers when they switched their local service?

A That's a trigger. That's a commonly used trigger to help people remember. It's just a device to help them remember. If you're trying -- and it's pretty widely recommended that people will remember better if you say, well, around your birthday or on a date or

something it hones it in for them.

Q Were the words in parentheses in that question read by the interviewers during the survey process?

A I would have to find that out for you, I don't know. I believe they were because they're instructed to read the response verbatim.

Q Turning to the next page the question of change without approval, slammed, did the interviewers when asking the question at the top of the page, "Could you please tell us the reasons as to why you switched your local service from IDS to BellSouth at this time," capture a verbatim response from respondents in noting that a respondent reported being changed from BellSouth to IDS without approval?

A We asked them to capture as much verbatim as they could, however, when I reviewed the survey responses it appeared that if a person basically said that that's what they did, because they all seemed to say I was changed from BellSouth to IDS without my approval and decided to return back to BellSouth, or to return to BellSouth, that's commonly said so I think that in some cases the interviewers may have simply

coded that category rather than keep writing the same thing over and over again.

Q And would an example of what you're referring to that you noted in the survey results be the answer at the bottom of page 12 of Exhibit Batcher 4 with respect to customer 16?

A I'm sorry, what page was that?

Q Page 12 of Exhibit Batcher 4, the very last line carrying over to page 13.

A Yes, that would be an example.

Q And you noted in reviewing the survey results that the interviewers repeatedly used this exact language in response to that question?

A Yes, which suggests to me that rather than write it out they simply checked the box.

Q Turning back to Exhibit Batcher 1, please. In the change without approval, slammed category, the script indicates right before price service that if slammed go to QX, did you receive any calls from BellSouth, do you see that?

A Not yet.

Q It's the second page of Exhibit 1 to your

testimony, right in the middle.

A Got it, okay.

Q If a respondent answered the question at the top of that page by reporting being slammed, did the interviewers ask any followup questions as to whether there were other reasons why the customer switched?

A There's two -- yes, they did. They were instructed to keep on asking until all reasons were elicited about the reason, were there other reasons, and then they were also instructed that if they were slammed or changed without their approval could you tell any more information about how this unauthorized change of service took place and to enter the verbatim comments and then they were switched to did you receive any calls.

Q So if a customer's first response was that he or she was slammed would the surveyor then ask the followup question, "Could you tell us any more information about how this unauthorized change of service took place"?

A Yes.

Q And after receiving an answer to that question

did the interviewer's ask the respondents whether there are any other reasons why they switched from IDS to BellSouth?

A I would have to verify that they did that but that's my understanding.

Q But that doesn't appear on this script, does it?

A That's why I want to verify it but this is our survey script and I'd need to verify with them as to how that was actually implemented.

Q Turning to Exhibit 2 of your testimony, please, that's Exhibit Batcher 1, for this deposition, your testimony.

A I'm sorry.

Q Exhibit 2 to Exhibit Batcher 1, for the record.

A Yes.

Q Did the surveyors prepare any classification of the responses in the other category that's referred to?

A No, but we do have in many cases a verbatim where we can see what the other might have been.

Q Let me ask you to turn to the final survey results, Exhibit Batcher 5. I'd like to direct your attention to the total column on the second page of Exhibit Batcher 5. What is the total there?

A 568. On Exhibit 2?

Q Yes.

A 568.

Q Let me ask you to turn to the next page to Exhibit 3, totals 297 and 230, which is a total of 527. Why is that number different than the total of 568 contained in Exhibit 2 of Exhibit Batcher 5?

A If you note the table note on Exhibit 2 it says the totals differ between exhibits because of item nonresponse.

Q Can you explain that for me, please?

A It means where a respondent doesn't answer all the items but they do answer the survey but they just don't provide an answer to some of the items.

Q Aren't the items that are identified in Exhibit 2 the same items that are identified in Exhibit 3?

A Yes, they are, but Exhibit 3 is screened first

for length of time, so if they didn't answer that, if they said they didn't know how long they had been with IDS they would not have been included in here.

Q How many people total were in the less-than-one month sample?

A 230. Actually, I see we would have coded the don't know, can't remember but if they for some reason didn't answer that question other than don't know, can't remember they would have not been included.

Q Did Ernst & Young undertake any effort to determine whether the split between people who had been with IDS less than one month versus greater than one month is representative of the total population in the survey?

A We wouldn't know that unless we had information as to when it went to IDS and when they came back.

Q So the answer is no, you didn't undertake any other effort?

A No.

Q Just to clarify for the record is the reason why the totals in all of the exhibits, 2 through 5, both

in your testimony as filed and in Exhibit Batcher 5 different because of nonanswers to questions?

A Yes, or perhaps the question didn't apply, although I think these are all summarized questions that would have been asked to all respondents.

Q Did the documents that Ernst & Young produced reflect the calculations that Ernst & Young performed to arrive at the 95 percent degree of certainty column?

A I believe there's a description of the calculation, if that's -- is that what you're asking?

Q Yes. Either is there a description of the calculation or is the actual calculation provided?

A Well, the description in general terms is on page five of Batcher 2, although it doesn't link up the, it doesn't specify that the 95 percent confidence interval there is -- if you take, it's twice the width of the, this is the whole confidence interval from low to high. The margin of error is half of that, it's the amount that you add and subtract so no, we didn't explain that but that is what it is.

Q So this formula represents the entire plus and minus confidence interval?

A No, actually it is the margin of error. If you look it says P hat plus or minus, so it is that calculation to the right of the plus or minus is the margin of error but we didn't specifically denote that. What we said is this is how you calculate a 95 percent confidence interval.

Q Is that a standard statistical formula that you utilized in the survey to calculate the 95 percent confidence interval?

A Yes.

Q Did you personally speak with any of the customers reflected in the 568 responses in the survey?

A No. I'm not sure, I don't think I would be a very good interviewer.

Q But the answer is no?

A No.

MR. MILLER: I have no further questions.

MR. MEZA: Mary Anne, do you have any questions?

MS. HELTON: No, I think we want to wait until the hearing, especially until we can review the documents that Dr. Batcher gave IDS.

MR. MEZA: Okay, not a problem.

EXAMINATION BY COUNSEL FOR THE DEFENDANT

BY MR. MEZA:

Q I just have a couple, Dr. Batcher. Can you explain what is Ernst & Young and the type of work that you do and how it relates to the survey?

MR. MILLER: Object to the form.

THE WITNESS: Ernst & Young is one of the big five accounting firms and we often are asked to do surveys and to do samples or review surveys or sampling procedures because of the independence of accounting firms and so this is not at all uncommon for us to do this. You had an and, and my role?

BY MR. MEZA:

Q And how it relates to this, what task you're asked to do by BellSouth.

MR. MILLER: Object to the form.

THE WITNESS: In terms of how it relates I think that's why we were asked to do this survey because of the independence, because we had the qualifications and skills to do it and because of the independence that audit firms maintain in order to stay in business.

BY MR. MEZA:

Q Is it important in conducting a survey that the survey be unbiased?

A Yes, it's critical.

Q In your opinion was the survey that Ernst & Young performed for BellSouth unbiased?

A Yes.

Q You testified in response to Mr. Miller's questions that approximately 568 customers were contacted?

A Yes. I'm sorry, not contacted, gave us interviews.

Q Actually filled out a survey?

A Yes.

Q Is that, in your opinion, an adequate representation of the population?

A Yes, it's very, it's really quite large. The rule of thumb for surveys is approximately 400.

MR. MEZA: I have no further questions, thank you.

MR. MILLER: Give me just one second.

I have no further questions. Off the record.

(Whereupon, at 11:58 a.m. the deposition of MARY BATCHER, Ph.D. was concluded.)

* * * * *

I, Mary Batcher, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changed and/or corrections, if any, appear in the attached errata sheet signed by me.

_____ _____

Date Mary Batcher, Ph.D.

September 28, 2001

Mr. James Meza, III
BellSouth Telecommunications, Inc.
Suite 1910
150 West Flagler Street
Miami, Florida 33130

Re: IDS vs. BellSouth Telecommunications
Deposition of Mary Batcher

Enclosed for your review is a copy of the above-referenced deposition, which includes an Acknowledgment of Deponent. Please have the deponent read the copy of the transcript and sign the enclosed Acknowledgment of Deponent. Also enclosed is an errata sheet which the deponent should use to note corrections. The errata sheet(s) should be signed and dated by the deponent.

Maryland Rules stipulate that the deponent has thirty days in which to read and sign the transcript. After the deponent has reviewed the copy of the transcript, please return the Acknowledgment of Deponent and any errata sheets to our office at 1020 19th Street, Northwest, Suite 620, Washington, D.C. 20036. If you have any questions regarding this matter, please contact us.

ESQUIRE DEPOSITION SERVICES
1020 19th Street, Northwest
Suite 620
Washington, D.C. 20036

ERRATA SHEET

Case Name: IDS Telecom vs. BellSouth Telecommunications, Inc.
Witness Name: Mary Batcher
Deposition Date: September 27, 2001
Job No. 140673

Page No.	Line No.	Correction	Reason for Correction

_____ _____
Signature Date

CERTIFICATE OF NOTARY PUBLIC

I, Marian E. Cummings, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

_____

Marian E. Cummings
Notary Public in and for the
District of Columbia

My commission expires:
April 3, 2003

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~~PROPRIETARY DOCUMENT~~

FILE COPY

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MARY K. BATCHER, PH.D.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010740-TP

AUGUST 27, 2001

Q. PLEASE STATE YOUR NAME AND YOUR BUSINESS ADDRESS.

A. My name is Mary K. Batcher. My business address is 1225 Connecticut Ave., NW, Washington, DC 20036.

Q. BY WHOM ARE YOU EMPLOYED?

A. I am employed by Ernst & Young LLP as a Principal in the Quantitative Economics and Statistics Group.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony is to be used in conjunction with and in support of the rebuttal testimony filed by Mr. John Ruscilli, another BellSouth witness. BellSouth has provided me with a list of customers who had been customers of IDS Telecom, LLC (IDS) during 2000 and 2001, but who had changed their local telephone service from IDS to BellSouth during that period. My task was to conduct a survey, using a statistically valid sample of these customers, for the purpose of learning why these customers returned to BellSouth.

EXHIBIT Batcher #1 9/27/01 mc

Q. BEFORE ADDRESSING THIS SURVEY AND ITS RESULTS, WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND?

A. I received a BS in sociology, and an MA and Ph.D. in statistics from the University of Maryland. My career as a statistical consultant spans over 15 years. While at Ernst & Young, I have designed statistical samples and conducted surveys in regulatory settings, including sampling to meet the requirements of the IRS, the Justice Department, and the Office of the Inspector General of Health and Human Services. I have conducted or critiqued surveys for the Federal Communications Commission and for use in litigation. Prior to my employment at Ernst & Young, I was a spokesperson and senior methodologist at the IRS, where I led a group that conducted surveys and performance measures for new IRS initiatives, like TeleFile, the filing of simple individual tax returns over the telephone. I also designed and monitored a test call survey to measure the accuracy of the telephone assistance provided to individual taxpayers by the IRS. I also have worked as a statistician at the Department of Education's National Center for Education Statistics, where I worked on surveys of state education agencies. I am an active member of the professional statistical community. In addition to my many other roles over my career, I am a past president of the Caucus for Women in Statistics and the Washington Statistical Society. I have been an associate editor of the Journal of the American Statistical Association and am currently an associate editor of the Journal of Data Science.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. During August 2001, BellSouth contacted Ernst & Young, to ask whether there was any way of determining why local telephone customers left an alternative local exchange company, IDS, to go to BellSouth for local telephone service. We recommended conducting a survey of a statistically valid sample of those customers to determine whether the causes of this migration could be determined. BellSouth agreed, and to that end, we designed a telephone survey and used it to contact a representative sample of former IDS customers who had moved to BellSouth for their local service during 2000 and 2001. **The survey asked former** IDS customers about the reason they made the switch to BellSouth. Responses were coded into categories including better pricing, better service, reaction to slamming and brand image. Efforts were taken in the phrasing of survey questions and the training of callers to ensure that the survey did not lead the respondent or influence the responses in any way.

The preliminary results have been evaluated in two ways, first by looking at all of the responses, and then by looking at subscribers who were with IDS more than one month, and those who were with IDS for less than one month. I will provide this information in some detail later in my testimony, but what stands out is that almost 29% of the respondents reported that they had been "slammed" by IDS, or moved to IDS without their permission. When those who left IDS after less than a month are segregated out, nearly 40% reported that they had been slammed. With

regard to the quality of the service that they were provided, less than 5% of the respondents left IDS because they felt that BellSouth's feature reliability was better, and less than 8% left because they felt the IDS telephone service was not working. Nine percent left IDS because of a bad experience with an IDS representative, and 20% left because of the pricing that BellSouth offered them. I will address the results and survey methodology in more detail in my testimony.

Q. PLEASE DESCRIBE THE SURVEY YOU CONDUCTED.

A. The survey is attached to my testimony as Exhibit 1. It is a short telephone survey which asks respondents to describe how the service changes came about, the length of time they were an IDS customer (less than a month or one or more months), and whether any contacts were initiated by a BellSouth representative. The purpose of the last question was to see whether BellSouth was initiating calls to try to induce the IDS customer to return to BellSouth. Almost 77% of the respondents reported receiving no call from a BellSouth representative. Survey targets were randomly selected from groups of BellSouth customers identified by BellSouth as being customers who had switched from IDS to BellSouth during 2000 and 2001.

The survey was conducted beginning August 22, 2001 and continues through the end of August. As of the writing of this testimony, preliminary results through August 27, 2001 are available based on more than 450 responses.

Q. WHAT ARE THE RESULTS OF THE SURVEY?

A. As I noted, preliminary results are available at this point. To date, we have obtained over 450 completed surveys from a population of more than 13,000 telephone customers who, at one point, were customers of IDS and left IDS to return to BellSouth Telecommunications.

When asked to think about the reasons why they switched back to BellSouth from IDS, almost 29% reported that they had been switched to IDS in the first instance without their approval, 20% switched because of BellSouth pricing and rates, 9% returned to BellSouth because of a bad experience with an IDS customer service representative, and 9% because of better accounting and billing by BellSouth. The complete list of reasons is shown in Exhibit 2.

The figure of 29% representing those who were "slammed" is even more informative when the responses are broken down by the length of time the customer was with IDS. Forty percent of customers who had been with IDS for less than a month indicated they had been switched from BellSouth without their approval; the corresponding percent for customers who had been with IDS for

more than a month was 19%. The other large category was better BellSouth pricing and rates: 22% for more than one month IDS customers and 15% for less than one month. Exhibit 3 shows the complete breakdown of reasons for switching back to BellSouth from IDS by length of time with IDS, more or less than one month.

Only three percent of respondents cited company image as a reason for switching. When that 3% was asked what information influenced their opinion, 12% (of the 3%) said mail material, 12% (of the 3%) said television or radio advertisements, and 29% (of the 3%) said calls from BellSouth. Thirty-six percent (of the 3%) said other or could not recall.

We asked every respondent if they received a call from a BellSouth representative. In general nearly 77% said no, nearly 16% said yes, and about 7.5% did not know. Exhibit 4 presents the details of these percents. Included as Exhibit 5, is a breakdown of the question about calls from a BellSouth representative by length of time with IDS.

We asked each respondent who said they received a call from a BellSouth representative what kind of things the BellSouth representative said that influenced the decision to change back to BellSouth. We received 77 statements. No statements were received indicating a BellSouth representative made a derogatory statement about IDS.

Q. EXHIBITS 2 THROUGH 5 INCLUDE A COLUMN LABELED 95% MARGIN OF ERROR. CAN YOU PLEASE EXPLAIN THAT COLUMN?

A. The 95% margin of error column contains the size of the plus or minus factor that is added and subtracted to and from the estimated percent to reflect the normal variability expected when we sample. It is variability due to the fact that we do not expect samples to be exactly alike. Samples from the same population will differ somewhat from each other and the population. The margin of error is used to build an interval around the estimate. Thus the estimated 9% of customers who switched from IDS to BellSouth because of a bad experience with an IDS customer service representative has a confidence interval of 9% +/- 3%. We are 95% confident that the true percent lies between 6% and 12%. We have displayed 95% margins of error which is a high degree of confidence in the interval. The width of the interval indicates the precision of the estimate. The smaller the margin of error, the more precise the estimate.

Q. WHAT STEPS HAVE YOU TAKEN TO ENSURE THAT THE SURVEY RESULTS ARE UNBIASED?

A. There are three major factors that protect against the survey results being misleading or not accurately representing the population. The first is the design of a statistically valid sample and the random selection of survey targets to be members of that sample. The second is the series of steps taken in the wording of

the survey questions, training of the telephone interviewers, and other efforts made to minimize misunderstandings or any kind of influence of the interviewer or survey on the response. The third factor is to minimize non-response. There will always be some degree of non-response, more with a business survey, but it should be kept as small as possible and efforts should be taken to determine whether the reason for the non-response is related to what is measured in the survey.

Q. CAN YOU DESCRIBE THE EFFORTS TAKEN TO REDUCE OR ELIMINATE BIAS IN THE DESIGN OF THE SURVEY ITSELF, QUESTION WORDING, AND THE WAY THE SURVEY WAS CONDUCTED?

A. The telephone survey was designed to first confirm that the correct business had been dialed, and that the person who made the decision to switch from IDS to BellSouth was contacted. The survey respondent was not informed about the purpose of the study. The respondent was only told that:

"A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier."

Additionally, neither the persons conducting the interviews nor their management were informed about the purpose of the study, so they could not communicate any clues or additional information about the sponsor or purpose to the survey target.

The most that these persons or their management might be able to infer from the script was that either BellSouth or IDS may be the sponsor of the study, but there was no way they could know which one for sure. Some multiple response choices were added to help hide the identity of the survey sponsor and make the survey appear as "open" as possible. For example, we provided responses to cover both possibilities that a customer could be slammed by either IDS or BellSouth.

Once the correct contact was confirmed, questions were asked in a neutral tone and in an open-ended manner so that the target would not be influenced by the categories of responses. This prevents any tendency of the respondent to provide answers that might please the interviewer or of the interviewer to give unintended cues through tone of voice or emphasis as he or she is reading the response categories.

Based on the response to the survey questions, the interviewers were instructed to code the response into multiple categories. Only where respondents had difficulty answering a question were they offered some possible response choices to help jog their memory. Furthermore, the order these response choices were offered to the target was randomized, so as to avoid any "order" effects which may otherwise occur. The interviewers were encouraged to "let the respondent talk", and to elicit information from the respondent. In order to be thorough and capture all reasons as to why a target switched service, the interviewers were instructed to ask the respondents if there were any other reasons which prompted the switch,

after the initial response(s) were offered, and to reiterate this question, until no further reasons for the switch were provided by the target.

For many questions, if the response did not fit an existing response choice, the interviewers were instructed to classify the response as "Other" and to enter as much of the comment as possible. A "Don't remember" response was included among the possible response categories.

In conclusion, the script was designed to obtain as "honest" a response as possible from survey targets, as to why they switched local phone service from IDS to BellSouth.

Q. WHAT STEPS WERE TAKEN TO PREVENT THE INTERVIEWERS FROM INFLUENCING THE RESPONSES?

A. In addition to the survey itself, the training of the interviewers is also a key factor in ensuring interviews do not lead the respondent to a desirable answer. The survey was implemented by a subcontractor, ORC Macro, Inc. We have worked with Macro in the past on several surveys and have found them to do excellent work. They train and supervise their interviewers and have a permanent staff of executive business interviewers who have received additional training on interviewing business executives. Macro is well aware that the cornerstone of a successful survey research project is the professional and accurate administration

of the survey instrument by trained survey interviewers. For this reason, the vendor maintains high standards for interviewer hiring, and devotes a great deal of time and attention to a comprehensive, systematic training program.

Interviewers are provided with a training manual, which includes a hard copy of the questionnaire with an item-by-item explanation of each question; definitions of terminology; discussions of potential sources of interviewer coding error with specific coding instructions; and instructions regarding appropriate probes. Interviewers also had access to a manual which contains a review of refusal conversion techniques, with specific techniques to reduce non-response.

All interviewers receive initial training consisting of Computer Assisted Telephone Interview (CATI) program training, interviewing protocol training, and administrative issues before they are allowed to participate in project-specific training.

All of the interviewers assigned to this project have prior survey experience. Nevertheless, training – both new training and refresher training – remains a key ingredient in the quality of Macro's data collection efforts. Interviewers received project specific training, during which purpose and scope of the survey, review of questions, probing, dealing with uncooperative respondents, and disposition of call attempts are covered.

In accordance with Ernst & Young instructions, the disposition of each call attempt is recorded for all of the records in the sample. The CATI system automatically stores the disposition of each attempt is in the sample management database. This provides a complete call history for each record in the sample. The call history is displayed on the interviewer's screen during each new attempt.

For this particular survey, the majority of interviewing session hours were scheduled for Monday through Friday, 9 a.m. to 6 p.m. Saturday calls were 10 a.m. to 5 p.m. and Sunday was 11 a.m. to 5 p.m.

Q. HOW DOES THE SAMPLING REDUCE BIAS?

A. The use of a statistically valid random sample allows us to know the likelihood that the sample is not representative of the population. By making the sample sufficiently large and keeping the non-response as small as possible and unrelated to the survey outcome, we prevent the sample and survey responses from being biased.

Q. YOU MENTIONED THE NEED TO KEEP SURVEY NON-RESPONSE LOW. WHAT STEPS HAVE YOU TAKEN TO DO SO?

A. Interviewers make a minimum of 15 attempts to reach an eligible business and interview the person who makes the decisions about phone service for each

telephone number in the sample. After three unsuccessful attempts, interviewers contact the operator to determine if the number is non-working. Each call attempt is given a minimum of five rings. The attempts are rotated through weekday day, Saturday day, and Sunday day shifts to maximize coverage of the primarily small business population. Experience suggests that one-third of the interviews from a well-managed sample will be completed on the first attempt, one-third on the second and one-third on the third attempt. A small but important fraction of survey targets will require five or more attempts.

One of the greatest advantages of computer-assisted interviewing is the ability to deal accurately and efficiently with large numbers of scheduled, definite appointments. Macro's system optimizes queuing for definite callbacks by continuously comparing station sample activity and the index of definite callback records. When a definite appointment time arrives, the system finds the next available station and delivers the record as the next call. The call history screen that accompanies each record informs the interviewer that the next call is a definite appointment and describes the circumstances of the original contact.

The handling of callbacks to respondents is always crucial to the success of any telephone survey project. The effective management of callbacks increases the response rate and the coverage of the population. Perhaps more importantly, scheduling an appointment that is convenient for the respondent and ensuring that the appointment is kept offers a basic courtesy to someone who has agreed to

assist us with a study. If a cooperative respondent has to terminate an interview, but wants to finish at a later time, it is possible to set a definite callback for that exact time and restart the interview where it left off. If the interviewer who began the survey is available at the prescribed time, the system will send the call back to that station.

Macro's CATI system automatically handles callbacks for "no-answer," "busy" and "answering machine" outcomes. There is a special set-up facility, used when originally configuring the survey, which determines a schedule for calling back no-answers. This ensures that repeated no-answers are retried at different times of day and days of the week.

Macro's Non-response Conversion Staff (NCS) calls back 100% of initial refusals. NSC interviewers are selected based on experience and performance. All NCS have a minimum of six months of telephone interviewing experience, have received extensive training on interviewing uncooperative respondents, and are paid a salary premium.

Q. ARE THE PRELIMINARY RESULTS OF THE SURVEY VALID?

A. Yes, the preliminary survey results are valid. We have been able to reach and interview over 450 former IDS customers who switched to BellSouth. For most response breakdowns, the size of the plus/minus factor around the estimate is

reasonable. The survey was well-designed and carefully implemented. The interviewers were trained and monitored. While many members of the sample have not been reached we have a lot of responses and there have been few outright refusals. Refusals currently make up only about 8% of the total number of in scope contacts. This is a reasonable non-response rate for a small business survey.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

408188

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 010740-TP
Exhibit MKB-1

THIS EXHIBIT CONSISTS OF 3 PAGES

Exhibit 1: Telephone Survey Script Switching Local Telephone Service Providers From IDS to BellSouth Telecommunications

NOTE: Unless indicated, choices are not read to the respondent. Only the question is read, and the CATI vendor selects the correct choice based on the target response.

Confirm Correct Business:

Hello is this [Business Name]?

☐ Yes
☐ No

If No: Is this [Phone Number]?

☐ Yes: Thank you. I must have been given the wrong number. Goodbye. Terminate call: Try to locate correct number and redial.

☐ No: Redial correct number

Obtain Correct Contact:

Contact Question: Hello, this is [first name] from MACRO. I'd like to speak with the person who makes decisions regarding your telephone service. This is not a sales call.

☐ Person is not available: find out availability and reschedule call.
☐ Person available: Repeat contact question to confirm.
☐ This is he/she speaking: continue...

With whom am I speaking? [Obtain first name, last name]: _____

Introduction:

A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier. We will ask no more than five questions.

In [Month Year] you switched your local telephone service from IDS to Bell South. (We are only interested in local service, not long distance at this time).

Q: Did you have local telephone service with IDS for at least one month, before switching to Bell South?

☐ Yes
☐ No
☐ Don't remember.

Q: Try to remember back to [Month Year]. Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at this time?

[Let respondent talk; do not read. Elicit response if needed. Mark best choice below.]

Unknown:

☐ The person who made phone service decisions at that time is no longer with the company

☐ I just don't remember.

If unknown go to: [Terminate Call]

Change without Approval (Slammed):

☐ I was changed from IDS to BellSouth without my approval.

☐ I was changed from BellSouth to IDS w/o approval, and decided to return to BellSouth

If changed without approval (slammed) ask: Could you tell us any more information about how this unauthorized change of service took place?

[Enter verbatim comments]: _____

[enter as much of the comment as possible]

If slammed go to: [Qx: Did you receive any calls from Bell South...]

Price/Service:

☐ Better BellSouth pricing/rates

☐ Better service

Q: If better service, (Prompt if necessary): Could you elaborate on what aspects of the service in particular, encouraged you to switch? (probe/elicit in **random order** if needed):

☐ Accounting / Billing was better

☐ Phone features e.g., call waiting, call hunting, were more reliable or better with BellSouth. What was the specific feature? _____

☐ Bad IDS Customer Service Representative experience

☐ Phone service was not working, i.e., no dial tone, with IDS.

☐ Other: (specify): _____

[enter as much of the comment as possible]

☐ Brand image / stability of company:

Q: What information influenced your opinion as to company image? [Read choices in **random order**, check all that apply]:

☐ Material received in the mail or via the Internet

☐ Television or Radio advertisements

☐ Calls from Bell South telephone company representative...

☐ Other (specify): _____

Qx: Did you receive any calls from Bell South representatives? [Note to MACRO pgmr: if respondent already indicated that they received calls from Bell South in previous question, then do not ask this question, i.e., skip to Qz.)

☐ Yes
☐ No
☐ Don't remember.

[If yes, or if "Calls from Bell South box is checked above, ask]...Qz: What kind of things did the rep say that influenced your decision?

_____

[enter as much verbatim as possible]

[Do not read the below choices to target. Classify target comment into choice below]

☐ BellSouth Rep described BellSouth services
☐ BellSouth Rep. compared BellSouth services against IDS
☐ BellSouth Rep. said negative things about IDS

Terminate Call:
That concludes our interview. Thank you for your help. Have a nice day.

BellSouth Telecommunications, Inc.
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Docket No. 010740-TP
Exhibit MKB-2

THIS EXHIBIT CONSISTS OF 1 PAGE

Exhibit 2: First choice of reason for switching local phone service from IDS to BellSouth.

	Percent Identifying Reason	+/-95% Margin of Error
[illegible] changed from IDS to BellSouth without my approval	6.6%	2.8%
[illegible] changed from BellSouth to IDS w/o approval and decided to return to BellSouth	28.6%	4.9%
Better BellSouth price/rates	19.9%	4.5%
Accounting/Billing was Better	8.9%	3.2%
Bad IDS Customer Service Representative Experience	9.0%	3.3%
Phone Features were More reliable or better With BellSouth	4.8%	2.4%
Phone service was not working with IDS	7.7%	3.0%
Other	9.0%	3.3%
Bundling - stability/ convenience	3.2%	2.0%
The person who made phone service decision is/was the one no longer with the company	0%	0%
Don't Know/Can't Remember	2.2%	1.6%
TOTAL	469 *	

* The totals differ between exhibits because of item non-response.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 010740-TP
Exhibit MKB-3

THIS EXHIBIT CONSISTS OF 1 PAGE

Exhibit 3: First choice of reason for switching local phone service from IDS to BellSouth by length of time with IDS.

	Length of time with IDS	Percent Citing Reason	95% Margin of Error
I was changed from IDS to BellSouth without my approval	> 1 month	4.7%	3.4%
	< 1 month	9.5%	5.4%
I was changed from BellSouth to IDS w/o approval and decided to return to BellSouth	> 1 month	19.2%	6.1%
	< 1 month	39.6%	9.0%
Better BellSouth pricing/rates	> 1 month	22.4%	6.5%
	< 1 month	15.3%	6.9%
Accounting/Billing w/ IDS Better	> 1 month	8.4%	4.1%
	< 1 month	9.0%	5.7%
Bad IDS Customer Service Representative experience	> 1 month	12.5%	5.4%
	< 1 month	5.9%	4.5%
Phone Features were More reliable or better With BellSouth	> 1 month	6.7%	4.0%
	< 1 month	3.1%	3.2%
Phone service wasn't working with IDS	> 1 month	8.4%	4.5%
	< 1 month	8.0%	5.3%
Other	> 1 month	11.0%	5.1%
	< 1 month	6.8%	4.9%
Brand image / stability of company	> 1 month	4.7%	3.4%
	< 1 month	1.5%	2.3%
The person who made the service decision / initiated the change is no longer with this company	> 1 month	0.0%	0%
	< 1 month	0.0%	0%
Don't know/can't remember	> 1 month	2.1%	2.2%
	< 1 month	1.4%	2.3%
TOTALS	> 1 month	244	
	< 1 month	191	

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Exhibit MKB-4

THIS EXHIBIT CONSISTS OF 1 PAGE

Exhibit 4: Did you receive any calls from BellSouth representatives?

	Percentage	95% Margin of Error
Yes	15.6%	4.0%
No	76.8%	4.7%
Don't Know	7.5%	3.0%
Refused	0.1%	0.1%
TOTAL	466	

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Florida Public Service Commission
Docket No. 010740-TP
Exhibit MKB-5

THIS EXHIBIT CONSISTS OF 1 PAGE

Exhibit 5: Did you receive any calls from BellSouth representatives by length of time with IDS?

	Length of time with IDS	Percent	95% Margin of Error
[redacted]	> 1 month	18.2%	6.2%
	< 1 month	13.1%	5.9%
[redacted]	> 1 month	73.3%	7.1%
	< 1 month	81.1%	7.0%
[redacted]	> 1 month	8.3%	4.5%
	< 1 month	5.9%	4.5%
[redacted]	> 1 month	0.1%	0.2%
	< 1 month	0.0%	0.0%
[redacted]	> 1 month	241	
	< 1 month	191	

Bell South Survey Sampling Steps
Switching Local Telephone Service Providers
From IDS to BellSouth Telecommunications
August 2001

- The survey is aimed toward three independent populations. All of the following steps will be preformed on each population.
    - Unbundled Network Elements (CB)
    - Resale (RB)
    - Slammed (SE)
- Data cleaning was preformed to prevent the same phone number from being selected more than once for the same population. A phone number is to only have one chance of being selected for the sample for each population. The following steps were preformed:
    - Sort each population by phone number and service issue date.
    - If a phone number was repeated or there was more than one record, the record with the most recent service issue date was retained to reduce recall bias in the survey. Remaining records with that phone number were dropped from the population.
    - If a phone number was repeated and the duplicate record had the same service issue date, only one record was kept in the population.
    - If any observation did not have a phone number, it was dropped from the population.
- The data was given to Ernst & Young LLP in an Excel spread sheet and was read into SAS using the SAS Import Wizard.
- Once the data for all three populations were read into SAS a series of programs were written to prevent phone number duplication.
- Once the population files were unduplicated, each file was sorted by service issue date.
- SAS was used to give each single phone number in the population a random order number. To give each phone number a random order number, three random seeds were chosen from a table of random numbers. The seeds used were as follows:
    - CB File –
    - RB File -
    - SE File –
- Each file was then put back into Excel, by using the SAS Export Wizard, and sorted into ascending order by its given random order number.
- Each observation in the population was assigned a tracking number corresponding to its customer type.

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- The target sample size for each category of customer, with 95 $\pm$ 5 percent confidence and precision and assuming binomial distribution with estimated proportion of p=0.5, was calculated for each unduplicated population. (See Attachment A for detailed calculations.)

- Assume a maximum 30 percent non-response rate, or 70 percent response rate, plus an additional 10 percent of customers who will be unreachable due to length of time from service issue date and the time of the survey, August 2001. Hence, we increased the target sample size for each type of customer by 40 percent.

- The target sample size was then selected within Excel by selecting the first '*n*' observations in the list for each customer type.

- The observations selected for the sample were then put into a separate Excel spreadsheet and then placed into three separate 'space delimited' files to be given to Macro. The following fields were supplied for each sample:

    - Issue Date
    - Phone Number
    - Company/Customer Name
    - Tracking Number

- Macro conducted the survey via telephone and recorded responses and returned the data to Ernst & Young LLP.

- The survey data was read into SAS by the Import Wizard and separated by customer type.

- Various SAS programs were written to summarize the survey data and provide proportions of all possible responses for specific questions.

- The proportions were then placed into and Excel spreadsheet where each customer type could be compared.

- Once each individual customer type was completed independently, a weighted total estimate of all customers was derived along with 95 percent confidence intervals for each of the weighted totals (See Attachment B for appropriate formulas).

Calculation of Sample Sizes
Switching Local Telephone Service Providers
From IDS to BellSouth Telecommunications
August 2001

Calculating a sample size required to estimate a proportion p within a bound of B.[1]

Use 95 percent confidence with 5 percent precision and assume p=0.5.

$$n = \frac{Npq}{(N-1)D + pq}$$

where

$$q = 1 - p \qquad \text{and} \qquad D = \frac{B^2}{1.96^2} = \frac{0.05^2}{1.96^2} \approx 6.508 * 10^{-4}$$

The three target unduplicated populations:

- Unbundled Network Elements (CB): $N_1 = 2231$
- Resale (RB): $N_2 = 9763$
- Slammed (SE): $N_3 = 1158$

Sample Size Calculation for a Finite Population:

- **Unbundled Network Elements (CB)**

$$n_1 = \frac{2231(0.5)(0.5)}{(2231-1)D + (0.5)(0.5)}$$
$$n_1 = 327.8$$
$$n_1 \approx 328$$

- **Resale (RB)**

$$n_2 = \frac{9763(0.5)(0.5)}{(9763-1)D + (0.5)(0.5)}$$
$$n_2 = 369.6$$
$$n_2 \approx 370$$

[1] See Scheaffer, Richard L., William Mendenhall III, and Lyman Ott. Elementary Survey Sampling: Fifth ed. United States: Wadsworth Publishing, 1996.

- **Slammed (SE)**

$$n_3 = \frac{1158(0.5)(0.5)}{(1159-1)D + (0.5)(0.5)}$$
$$n_3 = 288.7$$
$$n_3 \approx 289$$

Now assuming a maximum 30 percent non-response rate plus an additional 10 percent of customers who will be unreachable due to length of time from service issue date and the time of the survey, August 2001, each sample size will be increased by 40 percent.

CB	*RB*	*SE*
$n_1' = 1.4(328)$	$n_2' = 1.4(370)$	$n_3' = 1.4(289)$
$n_1' = 459.2$	$n_2' = 518$	$n_3' = 404.6$
$n_1' \approx 460$		$n_3' \approx 405$

Thus the target sample sizes with the 40 percent increase are:

- Unbundled Network Elements (CB): $n_1' = 460$
- Resale (RB): $n_2' = 518$
- Slammed (SE): $n_3' = 405$

Calculation of the Estimated Population Proportions and Appropriate Confidence Intervals

Switching Local Telephone Service Providers From IDS to BellSouth Telecommunications August 2001

Estimating a population proportion p from a stratified random sample[2]:

$$\hat{p}_{st} = \frac{1}{N}(N_1\hat{p}_1 + N_2\hat{p}_2 + N_3\hat{p}_3)$$
$$= \frac{1}{N}\sum_{i=1}^{3} N_i\hat{p}_i$$

Estimating the variance of $\hat{p}_{st}$:

$$\hat{V}(\hat{p}_{st}) = \frac{1}{N^2}[N_1^2\hat{V}(\hat{p}_1) + N_2^2\hat{V}(\hat{p}_2) + N_3^2\hat{V}(\hat{p}_3)]$$

$$= \frac{1}{N^2}\sum_{i=1}^{3} N_i^2\left(\frac{N_i - n_i}{N_i}\right)\left(\frac{\hat{p}_i\hat{q}_i}{n_i - 1}\right)$$

Calculating a 95 percent confidence interval for $\hat{p}_{st}$:

$$\hat{p}_{st} \pm 1.96\sqrt{\hat{V}(\hat{p}_{st})}$$

[2] See Scheaffer, Richard L., William Mendenhall III, and Lyman Ott. Elementary Survey Sampling: Fifth ed. United States: Wadsworth Publishing, 1996.

Telephone Script Design Notes for
"Switching Local Telephone Service Providers"
By: Robert P. Wederich
08/24/01

The purpose of the survey as stated by Douglas Lackey in his August 16th 2001 memo to Glenn White (E&Y LLP) is, "Basically, we want to know why the customers left IDS and came back to BellSouth."

According to Mr. Lackey, all or most of the customers targeted for interview are businesses, and at one point in time, all had received local telephone service from IDS Telecom, Inc., only to switch their local service to BellSouth. Some possible reasons customers may have switched from IDS to BellSouth as offered by Mr. Lackey were that customers may have been "slammed" by IDS, i.e., switched from BellSouth to IDS without customer permission, and then decided to return to BellSouth; others may have been won back by BellSouth's offering them a "better deal"; others may have had billing problems or experienced poor service from IDS; and some may have been scared by BellSouth representatives badmouthing IDS. Where customers were slammed by IDS, or where they experienced service problems by IDS, or had heard negative comments about IDS from a BellSouth representative, details surrounding the incidents were desired.

Given this purpose, the telephone survey was designed to first confirm that the correct business had been dialed, and that the person who made the decision to switch from IDS to BellSouth was contacted.

The survey target was kept blind as to the purpose of the study. The respondent was only told that:

> *"A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier."*

The CATI vendor was also kept blind as to the purpose of the study and so could not communicate any queues or additional information about the sponsor or purpose to the survey target. The most the CATI vendor might be able to infer from the script was that either BellSouth or IDS may be the sponsor of the study, but there was no way they could know which one for sure. Some multiple response choices were added to help hide the identity of the respondent from the CATI vendor and make the survey appear as "open" as possible, for example, we provided responses to cover both possibilities of a customer being slammed by IDS or by BellSouth.

Once the correct contact was confirmed, questions were asked in a neutral tone and in an open ended manner so that the target would be minimally influenced by demand characteristics of the situation as to what response to provide. (Demand characteristics are all the cues which convey the purpose of a study to the survey target. Since targets typically wish to help an experimenter obtain a desired outcome, the purpose of a study is often kept hidden because an experimenter wishes to confirm

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a hypothesis because of the relationships which exist among the variables, and not because a target wants to be nice and conform or change their behavior to produce the desired outcome.) Based on the response provided by the target to the questions, the CATI vendor was instructed to code the response into a multiple choice category. Only where respondents had difficulty answering a question were they offered some possible response choices to help jog their memory. Furthermore, the order these response choices were offered to the target was randomized, so as to avoid any "order" effects which may otherwise occur. The CATI vendor was encouraged to "let the respondent talk", and to elicit information from the respondent. In order to be thorough and capture all reasons as to why a target switched service, the CATI vendor was instructed to ask the respondent if there were any other reasons which prompted the switch, after initial response(s) were offered, and to reiterate this question, until no further reasons for the switch were provided by the target.

For many questions, if the response did not fit an existing response choice, the CATI vendor was instructed to classify the response as "Other" and to enter as much of the comment as possible. A "Don't remember" response was included among the possible responses available to the CATI vendor for selection.

In conclusion, the script was designed to obtain as "honest" a response as possible from survey targets, as to why they switched local phone service from IDS to BellSouth.

Robert Wederich manages the Survey Center for Ernst & Young LLP, and has been creating surveys and providing cognitive reviews of survey instruments for E&Y clients for over seven years. He has a graduate background in Social Psychology from Miami University, and has kept up to date with recent developments by attending short courses offered by AAPOR and JPSM. He is also familiar with recent literature, which includes books such as "Mail and Internet Surveys, The Tailored Design Method" (Dillman, 2000), and "The Psychology of Survey Responses" (Tourangeau, Rips, Rasinski, 2000).

Draft Telephone Script
Switching Local Telephone Service Providers
Freeform Format (less prone to suggestions and order effects)

NOTE: Unless indicated, choices are not read to the respondent. Only the question is read, and the CATI vendor selects the correct choice based on the target response.

Confirm Correct Business:

Hello is this [Business Name]?

☐ Yes
☐ No

If No: Is this [Phone Number]?

☐ Yes: Thank you. I must have been given the wrong number. Goodbye. Terminate call: Try to locate correct number and redial.

☐ No: Redial correct number

Obtain Correct Contact:

Contact Question: Hello, this is [first name] from Macro. I'd like to speak with the person who makes decisions regarding your telephone service. This is not a sales call.

☐ Person is not available: find out availability and reschedule call.
☐ Person available: Repeat contact question to confirm.
☐ This is he/she speaking: continue…

Introduction:

A number of phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study. We will ask no more than five questions.

In [Month Year] you switched your local telephone service from IDS to Bell South. (We are only interested in local service, not long distance at this time).

Q: Did you have local telephone service with IDS for at least one month, before switching to Bell South?

☐ Yes
☐ No
☐ Don't remember.

Q: Try to remember back to [Month Year]. Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at this time?

[Let respondent talk. Elicit response if needed. Mark best choice below.]

Unknown:

☐ The person who made phone service decisions at that time is no longer with the company

☐ I just don't remember.

If unknown goto: [Terminate Call]

Slammed:

☐ I was changed from IDS to BS w/o their approval.

☐ I was changed from Bell South to IDS w/o approval, and decided to return to BS

If slammed, ask: Q: Could you tell us any more information about how this unauthorized change of service took place?

[Enter verbatim comments]: _____

If slammed goto: [Terminate Call]

☐ Better pricing/rates

☐ Better service

Q: If better service, (Prompt if necessary): Could you elaborate on what aspects of the service in particular, encouraged you to switch? (probe/elicit in random order if needed):

☐ Accounting / Billing was better

☐ Phone features e.g., call waiting, call hunting, were more reliable or better with BS.

☐ Telephone line quality was better / less noise.

☐ Phone service was not working, i.e., no dial tone, with IDS.

☐ Other: (specify): _____

☐ Brand image / stability of company:

Q: What information influenced your opinion as to company image? [Read choices in random order, check all that apply]:

☐ Material received in the mail or via the Internet

☐ Television or Radio advertisements

☐ Calls from IDS telephone company representative

☐ Calls from Bell South telephone company representative...

☐ Other (specify): _____

If calls from Bell South representative, ask...

Q. What kind of things did the rep say that influenced your decision:

_____

[Do not read below choices to target. Classify target comment into choice below]

- ☐ Bell South Rep described their services
- ☐ Bell South Rep. Compared their services against IDS
- ☐ Bell South Rep. Said negative things about IDS

Terminate Call:
That concludes our interview. Thank you for your help. Have a nice day.

Draft Telephone Script
Switching Local Telephone Service Providers
Freeform Format (less prone to suggestions and order effects)
Version 2

NOTE: Unless indicated, choices are not read to the respondent. Only the question is read, and the CATI vendor selects the correct choice based on the target response.

Confirm Correct Business:

Hello is this [Business Name]?

☐ Yes
☐ No

If No: Is this [Phone Number]?

☐ Yes: Thank you. I must have been given the wrong number. Goodbye. Terminate call: Try to locate correct number and redial.

☐ No: Redial correct number

Obtain Correct Contact:

Contact Question: Hello, this is [first name] from MACRO. I'd like to speak with the person who makes decisions regarding your telephone service. This is not a sales call.

☐ Person is not available: find out availability and reschedule call.
☐ Person available: Repeat contact question to confirm.
☐ This is he/she speaking: continue…

May I have the name of the decision maker? _____

Introduction:

A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier. We will ask no more than five questions.

In [Month Year] you switched your local telephone service from IDS to Bell South. (We are only interested in local service, not long distance at this time).

Q: Did you have local telephone service with IDS for at least one month, before switching to Bell South?

☐ Yes
☐ No
☐ Don't remember.

Q: Try to remember back to [Month Year]. Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at this time?

[Let respondent talk; do not read. Elicit response if needed. Mark best choice below.]

Unknown:

☐ The person who made phone service decisions at that time is no longer with the company
☐ I just don't remember.

If unknown go to: [Terminate Call]

Change without Approval (Slammed):

☐ I was changed from IDS to BellSouth without their approval.
☐ I was changed from BellSouth to IDS w/o approval, and decided to return to BellSouth

If changed without approval (slammed) ask: Could you tell us any more information about how this unauthorized change of service took place?

[Enter verbatim comments]: _____
enter has much of the comment as possible

If slammed go to: [Terminate Call]

Price/Service:

☐ Better BellSouth pricing/rates

☐ Better service

Q: If better service, (Prompt if necessary): Could you elaborate on what aspects of the service in particular, encouraged you to switch? (probe/elicit in random order if needed):

☐ Accounting / Billing was better
☐ Phone features e.g., call waiting, call hunting, were more reliable or better with BellSouth. What was the specific feature? _____
☐ Bad IDS Customer Service Representative experience
☐ Phone service was not working, i.e., no dial tone, with IDS.
☐ Other: (specify): _____
enter has much of the comment as possible

☐ Brand image / stability of company:

Q: What information influenced your opinion as to company image? [Read choices in random order, check all that apply]:

☐ Material received in the mail or via the Internet

☐ Television or Radio advertisements
☐ Calls from Bell South telephone company representative...
☐ Other (specify): _____

Q: Did you receive any calls from Bell South representatives?
If yes, what kind of things did the rep say that influenced your decision:

_____

enter has much verbatim as possible

[**Do not read the below choices to target.** Classify target comment into choice below]

☐ BellSouth Rep described BellSouth services
☐ BellSouth Rep. compared BellSouth services against IDS
☐ BellSouth Rep. said negative things about IDS

Terminate Call:
That concludes our interview. Thank you for your help. Have a nice day.

Draft Telephone Script
Switching Local Telephone Service Providers
Freeform Format (less prone to suggestions and order effects)
Version 3

NOTE: Unless indicated, choices are not read to the respondent. Only the question is read, and the CATI vendor selects the correct choice based on the target response.

Confirm Correct Business:

Hello is this [Business Name]?
☐ Yes
☐ No

If No: Is this [Phone Number]?

☐ Yes: Thank you. I must have been given the wrong number. Goodbye. Terminate call: Try to locate correct number and redial.

☐ No: Redial correct number

Obtain Correct Contact:

Contact Question: Hello, this is [first name] from MACRO. I'd like to speak with the person who makes decisions regarding your telephone service. This is not a sales call.

☐ Person is not available: find out availability and reschedule call.
☐ Person available: Repeat contact question to confirm.
☐ This is he/she speaking: continue…

With whom am I speaking? [Obtain first name, last name]: _____

Introduction:

A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier. We will ask no more than five questions.

In [Month Year] you switched your local telephone service from IDS to Bell South. (We are only interested in local service, not long distance at this time).

Q: Did you have local telephone service with IDS for at least one month, before switching to Bell South?

☐ Yes
☐ No
☐ Don't remember.

Q: Try to remember back to [Month Year]. Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at this time?

[Let respondent talk; do not read. Elicit response if needed. Mark best choice below.]

Unknown:

☐ The person who made phone service decisions at that time is no longer with the company

☐ I just don't remember.

If unknown go to: [Terminate Call]

Change without Approval (Slammed):

☐ I was changed from IDS to BellSouth without my approval.

☐ I was changed from BellSouth to IDS w/o approval, and decided to return to BellSouth

If changed without approval (slammed) ask: Could you tell us any more information about how this unauthorized change of service took place?

[Enter verbatim comments]: _____
[enter as much of the comment as possible]

If slammed go to: [Qx: Did you receive any calls from Bell South…]

Price/Service:

☐ Better BellSouth pricing/rates

☐ Better service

Q: If better service, (Prompt if necessary): Could you elaborate on what aspects of the service in particular, encouraged you to switch? (probe/elicit in **random order** if needed):

☐ Accounting / Billing was better

☐ Phone features e.g., call waiting, call hunting, were more reliable or better with BellSouth. What was the specific feature? _____

☐ Bad IDS Customer Service Representative experience

☐ Phone service was not working, i.e., no dial tone, with IDS.

☐ Other: (specify): _____
[enter as much of the comment as possible]

☐ Brand image / stability of company:

Q: What information influenced your opinion as to company image? [Read choices in **random order**, check all that apply]:

☐ Material received in the mail or via the Internet

☐ Television or Radio advertisements
☐ Calls from Bell South telephone company representative...
☐ Other (specify): _____

Qx: Did you receive any calls from Bell South representatives? [Note to MACRO pgmr: if respondent already indicated that they received calls from Bell South in previous question, then do not ask this question, i.e., skip to Qz.)

☐ Yes
☐ No
☐ Don't remember.

[If yes, or if "Calls from Bell South box is checked above, ask]...Qz: What kind of things did the rep say that influenced your decision?

_____

[enter as much verbatim as possible]

[**Do not read the below choices to target.** Classify target comment into choice below]

☐ BellSouth Rep described BellSouth services
☐ BellSouth Rep. compared BellSouth services against IDS
☐ BellSouth Rep. said negative things about IDS

Terminate Call:
That concludes our interview. Thank you for your help. Have a nice day.

Telephone Survey Script
Switching Local Telephone Service Providers
From IDS to BellSouth Telecommunications

NOTE: Unless indicated, choices are not read to the respondent. Only the question is read, and the CATI vendor selects the correct choice based on the target response.

Confirm Correct Business:

Hello is this [Business Name]?

☐ Yes
☐ No

If No: Is this [Phone Number]?

☐ Yes: Thank you. I must have been given the wrong number. Goodbye. Terminate call: Try to locate correct number and redial.

☐ No: Redial correct number

Obtain Correct Contact:

Contact Question: Hello, this is [first name] from MACRO. I'd like to speak with the person who makes decisions regarding your telephone service. This is not a sales call.

☐ Person is not available: find out availability and reschedule call.
☐ Person available: Repeat contact question to confirm.
☐ This is he/she speaking: continue…

With whom am I speaking? [Obtain first name, last name]: _____

Introduction:

A number of local phone companies are interested in why customers switch services. Ernst & Young, a major audit firm, has been asked to conduct a study on why customers change their local telephone carrier. We will ask no more than five questions.

In [Month Year] you switched your local telephone service from IDS to Bell South. (We are only interested in local service, not long distance at this time).

Q: Did you have local telephone service with IDS for at least one month, before switching to Bell South?

☐ Yes
☐ No
☐ Don't remember.

Q: Try to remember back to [Month Year]. Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at this time?

[Let respondent talk; do not read. Elicit response if needed. Mark best choice below.]

Unknown:

☐ The person who made phone service decisions at that time is no longer with the company
☐ I just don't remember.

If unknown go to: [Terminate Call]

Change without Approval (Slammed):

☐ I was changed from IDS to BellSouth without my approval.
☐ I was changed from BellSouth to IDS w/o approval, and decided to return to BellSouth

If changed without approval (slammed) ask: Could you tell us any more information about how this unauthorized change of service took place?

[Enter verbatim comments]: _____
[enter as much of the comment as possible]

If slammed go to: [Qx: Did you receive any calls from Bell South...]

Price/Service:

☐ Better BellSouth pricing/rates

☐ Better service

Q: If better service, (Prompt if necessary): Could you elaborate on what aspects of the service in particular, encouraged you to switch? (probe/elicit in **random order** if needed):

☐ Accounting / Billing was better
☐ Phone features e.g., call waiting, call hunting, were more reliable or better with BellSouth. What was the specific feature? _____
☐ Bad IDS Customer Service Representative experience
☐ Phone service was not working, i.e., no dial tone, with IDS.
☐ Other: (specify): _____
[enter as much of the comment as possible]

☐ Brand image / stability of company:

Q: What information influenced your opinion as to company image? [Read choices in **random order**, check all that apply]:

☐ Material received in the mail or via the Internet
☐ Television or Radio advertisements
☐ Calls from Bell South telephone company representative...

☐ Other (specify): _____

Qx: Did you receive any calls from Bell South representatives? [Note to MACRO pgmr: if respondent already indicated that they received calls from Bell South in previous question, then do not ask this question, i.e., skip to Qz.)

☐ Yes
☐ No
☐ Don't remember.

[If yes, or if "Calls from Bell South box is checked above, ask]...Qz: What kind of things did the rep say that influenced your decision?

_____
[enter as much verbatim as possible]

[**Do not read the below choices to target.** Classify target comment into choice below]

☐ BellSouth Rep described BellSouth services
☐ BellSouth Rep. compared BellSouth services against IDS
☐ BellSouth Rep. said negative things about IDS

Terminate Call:
That concludes our interview. Thank you for your help. Have a nice day.

********** Case ID: 0002 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100131
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: karen
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
_
Response: I was switched from IDS to BellSouth without my approval...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?] [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: they took down all my voice mail, really upset with ids, lost 3 days worth of business, lied about saving all thios money, billed 2 months in one all misrepresentation bell south a little but higher but not liars
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: none
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response. 000000296

********** Case ID: 0003 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100242
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...

Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: PERSON IS AVAILABLE (TRANSFERRING CALL)
Q4 at [2/77.2]: Q4. Are you the person who makes the decisions regarding your telephone service?
Response: YES
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: risper
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from IDS to BellSouth without my approval...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: tired of the people from ids calling
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: give bellsouth concent
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000252

********** Case ID: 0004 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100008
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT

READ LIST...]
Response: PERSON IS AVAILABLE (TRANSFERRING CALL)
Q4 at [2/77.2]: Q4. Are you the person who makes the decisions regarding your telephone service?
Response: YES
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: ted gloden
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000186

********** Case ID: 0005 **********

MASTERID at [1/26.8]: MASTERID
Response: 01101106
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: agustine
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?

Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: they didnt deliver what they said
Q8 at [4/5.2,4/7.2,4/9.2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch?
[INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: Accouting/Billing was better
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000147

********** Case ID: 0006 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100202
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: nancy
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least *one month, before* switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
_
Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q8 at [4/5.2,4/7.2,4/9 2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch?
[INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: OTHER (SPECIFY)
Q8_OTH at [5/5.70]: Q8.OTH What OTHER aspects of the service, in particular, encouraged you to switch? [INTERVIEWER, PLEASE ENTER "OTHER (SPECIFY)" HERE...] OTHER SPECIFY
_____

Response: customer couldn't get dsl service without all lines
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: YES
Q10A at [6/9]: Q10A. What kinds of things did the rep say that influenced your decision? [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK!!!] [INTERVIEWER, PLEASE ENTER VERBATIM HERE...]

Response: that bellsouth required all lines but couldn't get dsl without giving up all lines
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000270

********** Case ID: 0007 **********

MASTERID at [1/26.8]: MASTERID
Response: 01101264
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: WACO DIE
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from BellSouth to IDS w/o my approval, and decided to return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: B/C I REALLY DIDNT WANT TO SWITCH IN THE FIRST PLACE
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: NO

Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000140

********** Case ID: 0008 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100415
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
Response: JOANE PETERSON
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000133

********** Case ID: 0009 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100282
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]

[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: PERSON IS AVAILABLE (TRANSFERRING CALL)
Q4 at [2/77.2]: Q4. Are you the person who makes the decisions regarding your telephone service?
Response: YES
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: Donnie
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000137

********** Case ID: 0010 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100715
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: LINDA
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched

your local service from IDS to Bell South at that time? [INTERVIEWER:
PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you
switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you
switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: HUSBAND DID IT BC OF SPECIAL RATES
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth
representatives? [PLEASE DO NOT READ LIST...]
Response: YES
Q10A at [6/9]: Q10A. What kinds of things did the rep say that
influenced your decision? [PLEASE PROBE FOR SPECIFICS...DO
NOT LEAVE BLANK!!!] [INTERVIEWER, PLEASE ENTER VERBATIM HERE...]

Response: BELL SOUTH CALLED AND SAID YOU CHANGED AND I CALLED AND CHANGED IT
BACK TO BELLSOUTH
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000149

********** Case ID: 0011 **********

MASTERID at [1/26.8]: MASTERID
Response: 01101043
INFO2 at [2/69]: [Info to interviewer: You have retrieved following
record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1)
Messages: ANSWERFROM(MDI_MSG) Press <Enter> to
continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and
last name]. from ORC Macro. May I speak with the person who makes decisions
regarding your telephone service? This is not a sales call. [PLEASE DO NOT
READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: CHARLOTTE
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at
least one month, before switching to Bell South? [PLEASE DO NOT
READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to
DATAFROM(0.1). Could you please tell us the reasons as to why you switched
your local service from IDS to Bell South at that time? [INTERVIEWER:
PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from BellSouth to IDS w/o my approval, and decided to
return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you
switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you
switched] [from IDS to BellSouth?]

[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name] from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: BOB
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000102

********** Case ID: 0016 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100062
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: pernig fuentes
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75 2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from BellSouth to IDS w/o my approval, and decided to

return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: saving of 25%
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: basicly ids was long distance then they offered 25% less for local service
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: YES
Q10A at [6/9]: Q10A. What kinds of things did the rep say that influenced your decision? [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK!!!] [INTERVIEWER, PLEASE ENTER VERBATIM HERE...]

Response: they said why did you swithch is something wrong ? did you have any complaints same server as bell south customer wanted same rate but bellsouth wouldn't give same 25% less rate
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000437

********** Case ID: 0017 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100472
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: TERESA
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED. .][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?

[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: price
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000117

********** Case ID: 0132 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100952
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: chris
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one montn, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
_
Response: I was switched from BellSouth to IDS w/o my approval, and decided to return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: it changed my call forwarding service
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000149

********** Case ID: 0133 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100868
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: dennis wear
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from IDS to BellSouth without my approval...
Q6_O at [4/1.2]. Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: they called me to say they could save me money --
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082201
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TOTTIME at [7/57.9]: TOTTIME
Response: 000000187

********** Case ID: 0134 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100933
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75 2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE

Response: STEVE
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from BellSouth to IDS w/o my approval, and decided to return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: IDS SD THEY HAVE BETTER RATES
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: CALLED ME
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000160

********** Case ID: 0198 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100862
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: PHYLLIS AMORY
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER:

PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: THEY MISREPRESENTED THEMSELVES SAYING THEY ARE AFFILIATED WITH BELLSOUTH
Q8 at [4/5.2,4/7.2,4/9.2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch?
[INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: Phone service was not working with IDS, ie. No dial tone...
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: YES (SPECIFY)
Q8_OPEN at [5/77]: [Q8.O. Were there any additional aspects of the service] [which prompted you to switch from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER ADDITIONAL REASONS, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: NEVER WOULD OF SWITCHED IF SHE HAD KNOWN WHO IDS WAS
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000297

********** Case ID: 0199 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100442
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: PERSON IS AVAILABLE (TRANSFERRING CALL)
Q4 at [2/77.2]: Q4. Are you the person who makes the decisions regarding your telephone service?
Response: YES
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: Roman
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to

READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from IDS to BellSouth without my approval...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O: Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: when ids called i was under thwe impression that the govt switched the rates for bell south and thats what ids was i called to cancel it
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: after i realized what they really were, well they recorded something i dont know i did realize it was another company they said my rate would be lower and it wasnt they didnt even asked me what my rates were with bell south
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000218

********** Case ID: 0241 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100034
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
Response: ADF
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER:

PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: MORE RELIABLE WITH BS IDS COULNDT GVE GIVE THE SAME SERVICE TRIED TO GET FEATURE WITH IDS AND DIDNT GET IT UNTIL 8MO LTR
Q8 at [4/5.2,4/7.2,4/9.2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch?
[INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: Phone features, eg. call waiting, call hunting, were more reliable or better with BellSouth
Q8_A at [4/15.70]: Q8A. What was the specific feature?
[INTERVIEWER, PLEASE ENTER VERBATIM HERE...] SPECIFY FEATURE

Response: CALL FORWARDING
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: YES (SPECIFY)
Q8_OPEN at [5/77]: [Q8.O. Were there any additional aspects of the service] [which prompted you to switch from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER ADDITIONAL REASONS, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: KEPT PROMISSING REFUNDS AND NEVER GAVE ANY MONEY BACK
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000155

********** Case ID: 0242 **********

MASTERID at [1/26.8]: MASTERID
Response: 01101182
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: josh
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]

representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000252

********** Case ID: 0263 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100574
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
Response: young
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: DON'T KNOW/DON'T REMEMBER
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
Response: Better BellSouth pricing/rates...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: YES
Q10A at [6/9]: Q10A. What kinds of things did the rep say that influenced your decision? [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK!!!] [INTERVIEWER, PLEASE ENTER VERBATIM HERE...]
Response: they gave me an offer to have two phone lines for 49$ a month
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000257

********** Case ID: 0264 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100622
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1) Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!] [INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION] [AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking? [INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...
_____
Response: doreen
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: YES
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]
_
Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?] [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: my advertisment bills got all switched around
Q8 at [4/5.2,4/7.2,4/9.2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch? [INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: Phone features, eg. call waiting, call hunting, were more reliable or better with BellSouth
Q8_A at [4/15.70]: Q8A. What was the specific feature? [INTERVIEWER, PLEASE ENTER VERBATIM HERE...] SPECIFY FEATURE
_____
Response: more the billing
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: NO
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082301
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000266

********** Case ID: 0265 **********

MASTERID at [1/26.8]: MASTERID
Response: 01101072

Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: PERSON IS AVAILABLE (TRANSFERRING CALL)
Q4 at [2/77.2]: Q4. Are you the person who makes the decisions regarding your telephone service?
Response: YES
Q4A at [2/79.70]: Q4A. With whom am I speaking?
[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: Donna
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: I was switched from BellSouth to IDS w/o my approval, and decided to return to BellSouth...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q7 at [4/4]: Q7. Could you tell us any more information about how this unauthorized change of service took place? [INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...] [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: they called i said no thanks and next thing you know i'm switched
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: NO
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082401
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000166

********** Case ID: 0307 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100252
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1)
Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W' to terminate...
Response: CONTINUE...
Q1 at [2/71.2]: [WARNING!!!!! IMPORTANT!!!!!]
[INTERVIEWER: IF NAME IS BLANK, PLEASE DO NOT READ QUESTION]
[AND ENTER CODE "99"] Q1. Hello, is this ANSWERFROM(CONAME)?
Response: YES
INTRO1 at [2/75.2]: Hello, this is _____. [Interviewer: use your first and last name]. from ORC Macro. May I speak with the person who makes decisions regarding your telephone service? This is not a sales call. [PLEASE DO NOT READ LIST...]
Response: YES, ON THE LINE
Q4A at [2/79.70]: Q4A. With whom am I speaking?

[INTERVIEWER: PLEASE ENTER NAME HERE...] NAME HERE...

Response: DAN
Q5 at [3/69.2]: Q5. Did you have local telephone service with IDS for at least one month, before switching to Bell South? [PLEASE DO NOT READ LIST...]
Response: NO
Q6 at [3/71.2,3/73.2,3/75.2,3/77.2,3/79.2]: Q6. Try to remember back to DATAFROM(0.1). Could you please tell us the reasons as to why you switched your local service from IDS to Bell South at that time? [INTERVIEWER: PLEASE READ ONLY IF NEEDED...][MUL=5] [PLEASE SELECT ALL THAT APPLY]

Response: Better service...
Q6_O at [4/1.2]: Q6.O. Were there additional reasons as to why you switched from IDS to BellSouth?
Response: YES (SPECIFY)
Q6_OPEN at [4/3]: [Q6.O. Were there additional reasons as to why you switched] [from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER REASONS GIVEN, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: THEY MESSED UP THE FAX LINE AND THEN PUT A BLOCK ON MY PHONE SO I COULNT RECIEVE COLLECT CALLS AND VOICE MAIL
Q8 at [4/5.2,4/7.2,4/9.2,4/11.2,4/13.2]: Q8. Could you elaborate on what aspects of the service, in particular, encouraged you to switch?
[INTERVIEWER: READ ONLY IF NEEDED, SELECT ALL THAT APPLY] [MUL=5]
Response: Phone features, eg. call waiting, call hunting, were more reliable or better with BellSouth
Q8_A at [4/15.70]: Q8A. What was the specific feature?
[INTERVIEWER, PLEASE ENTER VERBATIM HERE...] SPECIFY FEATURE

Response: NO VM, BLOCK ON LONG DISTANCE
Q8_O at [5/75.2]: Q8.O. Were there any additional aspects of the service which prompted you to switch from IDS to BellSouth?
Response: YES (SPECIFY)
Q8_OPEN at [5/77]: [Q8.O. Were there any additional aspects of the service] [which prompted you to switch from IDS to BellSouth?]
[INTERVIEWER: PLEASE ENTER ADDITIONAL REASONS, VERBATIM, BELOW...]
[PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK]
Response: I HAD GOOD SERVICE WITH BELLSOUTH BUT THE RATE WERE TOO HIGH AND IDS SAID THAT THEY WOULD LOWER THE RATES
Q10 at [6/7.2]: Q10. Did you receive any calls from BellSouth representatives? [PLEASE DO NOT READ LIST...]
Response: YES
Q10A at [6/9]: Q10A. What kinds of things did the rep say that influenced your decision? [PLEASE PROBE FOR SPECIFICS...DO NOT LEAVE BLANK!!!] [INTERVIEWER, PLEASE ENTER VERBATIM HERE...]

Response: I ALREADY SWITCHED BACK TO BELL SOUTH
TMPIDATE at [7/5.6]: TMPIDATE
Response: 082401
STUDNUM at [7/22.8]: STUDNUM
Response: C927
TMPCDATE at [7/47.6]: TMPCDATE
Response: 010823
TOTTIME at [7/57.9]: TOTTIME
Response: 000000192

********** Case ID: 0308 **********

MASTERID at [1/26.8]: MASTERID
Response: 01100246
INFO2 at [2/69]: [Info to interviewer: You have retrieved following record] Next Interview: DATAFROM(0.1) Tracking Number: DATAFROM(0.1)
Messages: ANSWERFROM(MDI_MSG) Press <Enter> to continue ... If wrong record retrieved Enter 'W to terminate...
Response: CONTINUE...

JAMES MEZA III
Attorney

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150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5561

September 14, 2001

Via Hand Delivery

Brian P. Miller, Attorney
Akerman, Senterfitt & Edison, P.A.
SunTrust International Center
One Southeast Third Avenue
28th Floor
Miami, Florida 33131-1714

RE: **010740-TP (IDS)**

Dear Brian:

As per our discussions, attached are Dr. Batcher's exhibits, updated with the final results of the survey Ernst & Young did for BellSouth.

Sincerely,

James Meza III

cc: Mary Anne Helton
Suzanne F. Summerlin
Nancy B. White
Doug Lackey
Patrick W. Turner

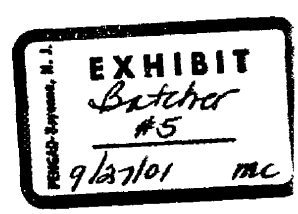

Exhibit 2: First choice of reason for switching local phone service from IDS to BellSouth.

	Percent Identifying Reason	95% Margin of Error
I was changed from IDS to BellSouth without my Approval	5.6%	2.5%
I was changed from BellSouth to IDS w/o approval, and decided to return to Bell South	28.6%	4.5%
Better BellSouth pricing/rates	19.4%	4.1%
Accounting/Billing was Better	8.3%	2.8%
Bad IDS Customer Service Representative experience	8.7%	3.0%
Phone Features were More reliable or better With BellSouth	5.1%	2.3%
Phone service was not working with IDS	8.2%	2.9%
Other	10.0%	3.2%
Brand image / stability of company	3.0%	1.7%
The person who made phone service decisions at that time is no longer with the company	0%	0%
Don't know/can't remember	3.2%	1.8%
TOTAL	568 *	

* The totals differ between exhibits because of item non-response.

Exhibit 3: First choice of reason for switching local phone service from IDS to BellSouth by length of time with IDS.

	Length of time with IDS	Percent Citing Reason	95% Margin of Error
I was changed from IDS to BellSouth without my Approval	> 1 month	4.0%	2.9%
	< 1 month	7.8%	4.4%
I was changed from BellSouth to IDS w/o approval, and decided to return to Bell South	> 1 month	18.6%	5.3%
	< 1 month	40.7%	8.2%
Better BellSouth pricing/rates	> 1 month	22.9%	6.0%
	< 1 month	13.9%	5.9%
Accounting/Billing was Better	> 1 month	7.3%	3.5%
	< 1 month	8.2%	4.7%
Bad IDS Customer Service Representative experience	> 1 month	12.1%	4.9%
	< 1 month	5.7%	4.0%
Phone Features were More reliable or better With BellSouth	> 1 month	7.0%	3.8%
	< 1 month	3.6%	3.1%
Phone service was not working with IDS	> 1 month	8.5%	4.0%
	< 1 month	8.3%	4.9%
Other	> 1 month	11.9%	4.8%
	< 1 month	8.4%	4.9%
Brand image / stability of company	> 1 month	4.3%	2.9%
	< 1 month	1.5%	1.9%
The person who made phone service decisions at that time is no longer with the company	> 1 month	0.0%	0%
	< 1 month	0.0%	0%
Don't know/can't remember	> 1 month	3.5%	2.6%
	< 1 month	2.1%	2.6%
TOTALS	> 1 month	297	
	< 1 month	230	

Exhibit 4: Did you receive any calls from BellSouth representatives?

	Percent	95% Margin of Error
Yes	15.4%	3.7%
No	77.3%	4.7%
Don't know	7.3%	3.7%
Refused	0.1%	0.1%
TOTAL	565	

Exhibit 5: Did you receive any calls from BellSouth representatives by length of time with IDS?

	Length of time with IDS	Percent	95% Margin of Error
Yes	> 1 month	18.9%	5.8%
	< 1 month	11.9%	5.1%
No	> 1 month	72.3%	6.6%
	< 1 month	83.3%	6.0%
Don't know	> 1 month	8.7%	4.2%
	< 1 month	4.8%	3.6%
Refused	> 1 month	0.1%	0.1%
	< 1 month	0.0%	0.0%
TOTAL	> 1 month	294	
	< 1 month	230	