#### State of Florida



# Public Service Commission -M-E-M-O-R-A-N-D-U-M-

**DATE:** July 30, 2002

**TO:** Division of the Commission Clerk and Administrative Services (Bayo)

FROM: Division of Competitive Markets & Enforcement (Watts)

**RE:** Docket No. 020646-TX, Compliance investigation of CAT Communications International,

Inc. for apparent violation of Rule 25-4.110(16), F.A.C., Customer Billing for Local

Exchange Telecommunications Companies.

Attached are letters and facsimiles that are pertinent to the subject docket. Please place these documents in the docket file accordingly.

#### Attachments:

- 1. Fax from Florida Telephone Services, LLC to staff dated May 30, 2002
- 2. Letter from staff to Ms. Debra Waller, CAT Communications, dated June 4, 2002
- 3. Fax from Florida Telephone Services, LLC to staff dated June 6, 2002
- 4. Letter from CAT Communications to staff dated June 26, 2002

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CMP	-
COM	****
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GCI	-
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SEC	***************************************
OTH	

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Fiorida Tolophone Services 1667 S. Hwy 17-92 Sulte 101 Longwood, FL 32750 Office (407) 331-8622 Fax (407) 331-9429

May 30, 2002

Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

RE: FTS Customer, Tina Wagner

Dear Madam/Sir:

Florida Telephone Services ("FTS") hereby files a complaint on behalf of Tina Wagner ("Customer") stating that she would like to transfer her residential phone service to FTS from Cat Communications Inc ("CCP"), but they have a freeze on her phone line.

As per the Customer's request, we tried to switch her to our platform. The response that we received from Sprint stated "152 REJECT\*\*\*2\* THERE IS A LOCAL SVC FREEZE ON THEIR ACCT AND THEY CANNOT BE CONVERTED UNTIL THIS IS REMOVED" (See Attachment I). We are requesting that CCI remove the service freeze and not disconnect the customer in order for the customer's service to be converted to FTS' platform.

Please feel free to contact me directly with any further questions or concerns at (407) 331-8622 ext. 709 or via email at <u>bridget@ftstelecom.com</u>.

Sincerely,

Bridget Derr

Accounting and Claims Department

1667 S. Highway 17-92

Suite 101

Longwood, FL 32750



ANKS 05-08-02

# AHachment I

LER Status/Confirmation 50E # : Rep ID:TRC LSR Status:J Due Date: APPT:? Completion Date: Bold Date: Last Nod. 105/08/2002 11:38:13 Date Recv.: 05/08/2002 11:26:37 Last POC. : ESDD: Resp Type: Conf Ver Reason Code: 7 Detail: C1 CONFLICTING INFO BEWARKS: 152 REJECT \*\*\* IF EU ADDRESS DOES NOT MATCH OUR RECORDS. ARE THEY MOVING ALSO WHILE CONVERTING? 2\*\* THERE IS A LOCAL SVC FREEZE ON THEIR ACCT AND THEY CANNOT BE CONVERTED UNTIL THIS IS REMOVED. TH

CLEC Cust Name: FLORIDA TELE SERV.

CLEC Tel No:4073318622 Remarks to Sprint:THIS IS A CLEC TO CLEC CONVERT - THANKS CLEC Init: SAUL DOSSANTOS CLEC Pax No: 4073319429

Service Information CC:8312 PON:507V16801 VER: 1 SUP:? Related PON: Tel No:407-331-8622 Improp : ROSA DDD:05/08/2002 Project: REQ TYP:E=Resale ACT: C=Change TOB: 2BF-DIDI DNRP. ACTL: CHC: APOT: ComplexiN NC:? HCI17 . SECNCI:? CONDITIONING OPTI? CONDITION COST: FREQUAL #1 CONDITIONING REMARKS:

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Resale Information LTOS: 2BF-PIC: NONE LPIC: NOME PPIC:? TM:352-385-0230 OTM: LNA: C-Change JEQTY:0 TSP: NPI 17 WRINGS: WIRB : #PATHS: Pesture Detail: CLEC Rate Activity SAE Code Description Retail Rate PCB 0.806 8.68 N 1FLC AL - ACCESS LINE DENY PPU CALL TRACE 0.00 0.806 0.00 PTC1OFF N 0.806 0.81 PUTIPLE FT-TOUCH TONE 1.01 Ж NO TELEMARKETING 0.00 0.806 0.00 AAANSBC N 2.75 AAABHSG3CO BNS NO SED PARTY/COLLECT 2.75 1.000 FPX18PM DENY SPM ANNOUNCEMENT 0.00 1.000 0.00 0.00 1.000 0.00 ж PTAIOPF DRNY-REPEAT DIAL OFF 2.50 DENY-TOLL BLX BCE-OFT5 2.50 1.000 PCT1FLCRB5 N DENY-DACC BLOCK 0.00 1.000 0.00 PCE1CCB N 0.00 TTB1OFF DENY-RETURN CALL OFF 0.00 3.000 0.00 P3W1OFF DENY-3-WAY CALLING 0.00 1.000 Total for Lines \$13.21

1901

#### STATE OF FLORIDA

COMMISSIONERS: LILA A. JABER, CHAIRMAN J. TERRY DEASON BRAULIO L. BAEZ MICHAEL A. PALECKI RUDOLPH "RUDY" BRADLEY



DIVISION OF COMPETITIVE MARKETS & **ENFORCEMENT** WALTER D'HAESELEER DIRECTOR (850) 413-6600

### Hublic Serbice Commission

June 4, 2002

#### VIA CERTIFIED LETTER AND FACSIMILE 540-444-2133

Ms. Debra Waller **CAT Communications** P. O. Box 6129 Roanoke, VA 24017-0129

Re: Local Service Freezes

Dear Ms. Waller:

The purpose of this letter is to bring to your attention a problem regarding the placement of local service freezes on customers' local access lines. Since January 2002 our Division of Consumer Affairs reports that it has received 25 complaints regarding the local service freeze and the customer's inability to change carriers.

The Commission's Rule 25-4.110 (16), Florida Administrative Code, requires that a company billing for local service must provide notification with the customer's first bill or via letter, and annually thereafter, that a freeze is available and that existing customers must be notified annually that a freeze is available. Staff interprets the rule as requiring that the freeze be at the customer's option. In addition, it is unclear to staff if CAT Communications charges the customer to place or remove the local service freeze. Section 364.603, Florida Statutes, requires that the subscriber must be notified of the ability to freeze his choice of carrier at no charge.

In addition, let me refer you to the following provisions taken from the FCC's Rule 64.1190, Preferred Carrier Freezes:

- (d) Solicitation and imposition of preferred carrier freezes.
- (1) All carrier-provided solicitation and other materials regarding preferred carrier freezes must include:
- (i) An explanation, in clear and neutral language, of what a preferred carrier freeze is and what services may be subject to a freeze;
- (ii) A description of the specific procedures necessary to lift a preferred carrier freeze; an explanation that these steps are in addition to the Commission's verification rules in Sections 64.1120 and 62.1130 for changing a subscriber's preferred carrier selections; and an explanation that the subscriber will be unable to make a change in carrier selection unless he or she lifts the freeze;
- (iii) An explanation of any charges associated with the preferred carrier freeze. (Note: Florida Statutes require that there be no charge for the freeze)

Ms. Debra Waller Page 2 June 4, 2002

(3) Written authorization to impose a preferred carrier freeze. A local exchange carrier may accept a subscriber's written and signed authorization to impose a freeze on his or her preferred carrier selection. Written authorization that does not conform with this section is invalid and may not be used to impose a preferred carrier freeze.

Perhaps this reference to the FCC rules may provide additional guidance to you in considering your approach to freezes on current accounts. To resolve this matter, CAT Communications should take the following actions:

- 1. Identify by telephone number, all customer lines which have a local preferred carrier (PC) freeze assigned.
- 2. Submit local service requests (LSRs) to the appropriate underlying local exchange company (Sprint, Verizon, BellSouth) to remove all PC freezes.
- 3. Notify all customers, via letter, that CAT Communications has removed the local PC freeze on its customers' lines. The letter should include an explanation of the local PC freeze and should provide instructions about obtaining a local PC freeze. The letter should clearly state that the option for a local PC freeze is exclusively the right of the customer.

No later than June 28, 2002, CAT Communications should provide a written report to me and it should include the following:

- a. A list of the telephone numbers on which CAT Communications had placed a local PC freeze prior to receiving this correspondence.
- b. A list of the purchase order numbers, by telephone number, for which CAT Communications submitted a LSR to the underlying carriers.
- c. A complete list of telephone numbers for customers that have requested a PC freeze in response to CAT Communications' letter identified in 3. above.
- d. A copy of a sample letter that was mailed to your customers.
- e. A copy of the company's current letter of authorization.
- f. A statement that CAT Communications does not require a local PC freeze as a condition of service.

Should you have any questions, I can be reached at 850-413-6582 and my facsimile number is 850-413-6583.

Sincerely,

Rick Moses

Rich Mrss

Chief, Bureau of Service Quality

State of Florida

Juniic Service Commission

2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



7000 1670 0012 8641 9509

Ms. Debra Waller
CAT Communications
P. O. Box 6129
Roanoke, VA 24017-0129

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)  C. Signature  X
Article Addressed to:	If YES, enter delivery address below:
Ms. Debra Waller CAT Communications P. O. Box 6129 Roanoke, VA 24017-0129	3. Service Type Certified Mail
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1667 S. Highway 17-92 Suite 101 Longwood, FL 32750 (407) 331-8622

### Florida Telephone Services

## **Fax**

To:	FL PSC 850-413-6585 919: 850-413-6584		From	Bridget Derr			
Faxi				Pagest	4		
Phone:			Date:	May 17, 2002			
Re:				CCI	850-413-6585, Ray	y Kenned <b>y</b>	
	ent	☐ For Review	☑ Please Con	nment	☑ Please Reply	☐ Please Recycle	

#### • Comments:

In the event that you require additional information, please feel free to contact me at 407-331-8622 ext.



Florida Telephona Services 1667 S. Hwy 17-92 Sulte 101 Longwood, FL 32750 Office (407) 331-8622 Fax (407) 331-9429

June 6, 2002

Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

RE: Cat Communications

Dear Madam/Sir:

Florida Telephone Services ("FTS") has had difficulty in converting service for the following phone numbers as Cat Communications ("CCI") currently has a service freeze on their lines:

305-696-3740 407-999-2684

We are respectfully requesting that CCI remove the local service freeze from these lines so that their service can be ported over to our platform. We also request, in addition, that these lines not be disconnected as they are changing telephone service providers.

Please feel free to contact me directly with any further questions or concerns at (407) 331-8622 ext. 709 or via email at bridget@ftstelecom.com.

Sincerely,

Bridget Derr

Accounting and Claims Department

1667 S. Highway 17-92

Suite 101

Longwood, FL 32750

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FLORIDA TELEPHONE SVCS CUS 8312 531V17209 v 69

Local Exchange Navigation System

View LSR/Order Information P O N Details

PON 531V17209

Version 00

Date Submitted 2002-06-04

2002-06-04 UNABLE TO HANDLE REQUEST, ENDUSER ACCOUNT FROZEN

References

Main Menu

Return to LSR/Order Info Main

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FLORIDA TELEPHONE SVCS CUS 8312 530V17186 Y 90

Local Exchange Navigation System

View LSR Order Information P O N Details

PON 530V17186

Version 00 Date Submitted

2002-06-04

2002-06-04 UNABLE TO HANDLE REQUEST, ENDUSER ACCOUNT FROZEN

References

Main Menu

Return to LSR/Order Info Main

Z831212

6/5/2002

PON for \$305-696-3740



1-888-477-1224 • Fax: (540) 265-6754 P.O. Box 6129, Roanoke, VA 24017-0129

June 26, 2002

Mr. Rick Moses
Public Service Commission of Florida
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850

Re Local Service Freezes

Dear Mr. Moses:

2002 JUN 27 PM 3: 16
DIVISION OF
COMPETITIVE SERVICES

We are in receipt of your letter dated June 4, 2002 regarding freezes. We are not sure from the letter and the rules you quote if we are addressing the state mandated Local Service Provider (LSP) freezes or the FCC mandated Preferred Interexchange Carrier (PIC) freezes. So we will address both issues.

We are enclosing a copy of the application that each customer receives upon the request for information regarding our company. Also, these applications are in the new customer packets that are mailed out shortly after receipt of the customer's payment for service.

This form lists the local service provider freeze. It also indicates there is a charge for removal. The reference to a charge will be eliminated with the next printing. Even though a charge is referenced, since CCI does not consider the LSP freeze as a condition of service, the customer has not been charged in Florida for quite some time.

In the last six months, a number of customers were charged for freeze removal. An agent authorized, at that time, to collect payments for CCI found it more profitable to migrate a customer's service to another provider rather than accept payments. The migration of the account allowed him to earn the commission plus he was collecting an additional \$10.00 for freeze removal. Unknown to CCI this had been a practice of his in the past and therefore he is no longer a CCI payment center. We were never a party to this deception, never saw the payments nor authorized or received the \$10.00 that he collected for the freeze removal. Some customers did not know they had been switched. Some customers continued to pay CCI and ended up without service because the new company took their service down for nonpayment. Having LSP freezes is a good way to keep this from happening. In order for the customer's service to be switched the customer would have had to know about it and authorize the removal of the freeze. We did file a complaint regarding this matter.

We realize that having a freeze on an account can result in a delay of 24 to 48 hours on the migration of an account. This should not present much of a problem except that most of the customers that have filed these complaints do not want to contact us because of the high

Rick Moses 6/26/2002 Page 2 of 2

outstanding balance they have with us. They also wait until the last day on their disconnection notice to begin migration.

These customers have reason to know there is a freeze on their account. Some of them have called us and asked that the freeze be removed, which we will do. At that time we do try to work out payment arrangements with them for the outstanding balance as any ILEC/ALEC would do. They then call you and inform you that we said they had to pay the balance before we would release the line. This is total misinformation.

If it is the Preferred Interstate Carrier (PIC) freeze you are questioning. CCI does not allow long distance to be attached to its lines. Our application, again, clearly states we are selling local phone service only. Our customers can have long distance two ways: (1) they can purchase a prepaid block of long distance through CCI or (2) they can use prepaid calling cards. Since CCI does not allow long distance to be attached to the line, we place a PIC of none and none on the account blocking a long distance carrier of any type and freeze this PIC information. We also block third party calls and access to 900 and 700 numbers. This is the way we provision service. We have answered complaints from Florida where the customer wants this freeze removed. It is a freeze that we do not remove. Many of our customers have gotten into trouble previously with toll charges they are unable to pay. Our service provides them with the local service they need without the risks of incurring large toll charges they cannot pay.

Another problem that CCI has encountered regarding freezes is that the ILECs themselves do not understand the blocks on the account. We have had one ILEC in particular who kept refusing to migrate a customer's service because of a freeze. The "freeze" they were seeing as a local service provider freeze was actually the long distance freeze. It took quite a few conversations with the ILEC involved to finally resolve this issue.

Find attached our letter that is sent to Florida Customers explaining our LSP freeze. Since we are not in violation of Florida rules and regulations regarding local service provider freezes, we feel that we should not have to provide you with confidential information on our customer base. Likewise, we are not abusing the use of the common LSP freeze and feel that is discriminatory for you to demand that we remove it from all of our customers.

We reviewed the complaints we received since January and have included a summary sheet of those complaints based on our findings. Please feel free to contact us at 540-444-2158 with any questions.

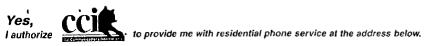
Sincerely,

Patricia M. Sheets

Vice President Regulatory Affairs

stricia M. Sheets

/ PMS/dw / Enclosures



HONESENG: WILL KIECH

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#### CUSTOMER SERVICE AGREEMENT

This document describes the conditions in which Cat Communications International, Inc. (henceforth referred to as "CCI") will provide service; and the conditions in which it will discome ct service. This constitutes the contract between the subscriber and CCI, the underlying earner of this service. You understand the followings:

- (1) By signing this document you are satering into a contractual agreement for local phone service with CCI as your carrier. You agree to allow CCI to act as your representative in all negotiations with any Local Exchange Carrier or telecommunications service provider. Long distance and toll calls are not included in your basic monthly local phone service unless specifically indicated. You authorize CCI to handle all negotiations for service requests at the address you have given in this agreement and for the phone number that CCI has given you. This authorization does not prevent you from changing carriers. You agree to read this document in full and to sign it only after you have read it, or have had it read to you, and you have fully understood it. 37 and you have fully understood it. 8
- (2)You request CCI to install phone service at your correct address. CCI needs you to sign a copy of this Customer. Service Agreement prior to installation.
- (3) CCI is not responsible for any delay or failure by any Local Exchange Carrier to process orders for service or for any internal problems such as wiring or jack installation at your residence.
- (4) In some areas you will be required to pay an installation charge not to exceed \$20. Should your service be suspended or disconnected (including voluntary disconnection requested by you), you will be charged a Reconnection Fee of forty dollars (\$40) or the Tariff Limit whichever is less If you pay your bill late you will be responsible for a late charge not to exceed Ten Dollars (\$10) or the Tariff Limit whichever is less. In North Carolina a Late Charge of one percent (1%) of the outstanding balance may be charged to your account if the balance due is not paid within twenty five (25) days of the billing date. In North Carolina the Reconnection Fee is thirty dollars (\$30).
- (5) There are no service charges for adding features to your new phone service when you first place your order. However, to add additional features or remove local service or provider freezes after you are connected, there is a Ten Dollar (\$10) service charge per order or the Tariff Limit, whichever is greater. All charges for service of any kind will begin the 1st day of that service. Your telephone bill will be due in full on the 5th or the 20th day of each month, depending on which due date you have chosen. You agree to pay the current fee that CCI is charging for your basic telephone services. This lee does not include all taxes, fees, or surcharges imposed by State, Federal and Local authorities, and you understand you will be responsible for these additional charges. The first month of your Safeway Protection Plan 90 Day Service Guarantee is FREE. You will be billed \$4:00 per month beginning with your second month of service. If you DO NOT want this valuable benefit, you must provide CCI with notification of your desire to cancel this coverage.
- (6) The bill for your prepard service, as well as any past due amounts you owe, will be mailed to you no less than fitteen (15) days prior to your due date. You may make your payment at any authorized CCI payment center or mail your payment directly to: CCI, Inc. at P.O. Box 6129, Roanoke, VA 24017-0129. There is no Grace Period. If CCI does not receive your payment on or before your due date, you will be sent a Termination Notice. If payment is not received within five (5) calendar days of the mailing of this notice, your telephone service may be suspended
- (7) CCI's Local Service allows unlimited local calls (except in areas of measured service or Community Calling Plans) from your home telephone. You will have access to all "1-800" toll-free numbers and 911 emergency services. You will not be able to: dial long distance using 1+ or 0+, dial 1-900, 1-700 or 1-976 toll calls; use directory assistance; or third party billing; or make or accept collect calls.
- (8) Your telephone service may be suspended or disconnected for the following reasons, among others;A) Your monthly bill has not been paid on time or in full. B) Charges pot authorized by CCI have been billed to your telephone number. C) If local telephone service is offered on a per call (Message Basis); or a per minute (Measured Basis), CCI reserves the right to suspend or disconnect your service immediately, or as soon as your state's regulation allows, if you exceed the number of local calls or minutes included in the basic monthly local service package unless CCI receives immediate payment for the excess calls CCI reserves the right to change your local service (if you exceed the number of local calls or minutes allotted you) to a different unlimited local calling plan which normally results in a higher monthly charge. If you are suspended for disconnected due to excessive local phone calls, you will be responsible for the applicable reconnection fee in addition to any other applicable
- (9) If your service is accidentally disconnected due to the fault of CCI you will be credited a prorated amount of your monthly service payment. equal to the dollar amount for the service which you did not receive(or whatever credit amount may be required by your state's regulations), as reflected in the records of CCI. If your service is accidentally disconnected for any reason, you will hold CCI harmless against any claims that a may arise from direct or indirect damages that may occur as a result of such a disruption of service including but not limited to your inability to call or access 911 emergency services." The state of the s 7.0 . 1. 5.45
- (10) CCI places toll restrictions, on local phone service. Such toll restrictions are not 100% effective. Any type of charges that you may make to your telephone service will be your sole responsibility and will be charged directly to you. Any charges such as, but not limited to, any type of Directory Assistance such as 411, 1-900, 1-976 or any unauthorized long distance charges including dial around calling (10-10-xxx) will be your. sole responsibility. CCI will not impose charges of late fees for calls charged to your bill which should have been properly blocked by the incumbent local exchange camer-(ILEC).
- (11) There will be a \$20 cancellation fee if you should choose to cancel your new service after the order has been submitted to CCI. There will be no service refunds once your service is connected. In North Carolina there is no fee for canceling your service.
- (12) If you wish to pay your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing this agreement your account monthly by "automatic debit", then by signing the properties agreement your account monthly by "automatic debit", and the properties agreement agre entries to your account at the financial institution through which you make payments to CCI for all payments due CCI. You may cancel authorization by providing written notice to CCI at least five (5) business days prior to the payment due date. You understand carceling your authorizazation by providing written notice to opt at least five (a) business days prior to the payment due out of the responsibility of paying your account in full. CCl's ACH Registration Number is 9541124703. This ACH authorization is not applicable in North Carolina. tion does not reneve you or the Carolina. 25.7 25.7 24.7
- (13) Questions about your service, including repairs, are to be directed to the offices of CCI at 1-(888) 532-7693. Any repair or service performed on your line will be done at your own risk and expense if you wish to request disconnection of your service you must submit the request in writing to: CCI, Inc., P.O. Box 6129, Roanoke, Virginia 24017-0129 or Fax:1-888-480-6224.

  LOA 11/01



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Dear Valued Customer:

CAT Communications International, Inc. (CCI) would like to thank you for your patronage.

In an effort to keep you informed about your service we will outline some of your account information and options available to you our customer.

At CCI we feel it is your right and privilege to have your local telephone service provided by the company of your choice. To better serve your needs, CCI places a local service provider freeze on your account. There is no charge for the placement or removal of this freeze. Because you must authorize CCI to remove this freeze prior to another provider migrating your service, it keeps your service from being moved over to another provider without your knowledge.

Also, we would like to take this time to remind you that you can have your name placed on the "No Sales Solicitation" list. To find out more about this visit the Florida Department of Agriculture's web site at <a href="https://www.doocs.state.fl.us">www.doocs.state.fl.us</a> or call them at 1-800-HELP-FLA (800-435-7352).

If you have any questions about the items discussed here or anything else regarding your account contact CCI at 1-888-477-1224.

Sincerely,

Your Friends at CCI

#### 2002 Complaint Review

1.

The Complaints received since January have been reviewed the following has been determined:

Most of the complaints where there seemed to be trouble with the customer migrating involved Florida Telephone Service. Several of those complaints the ILEC told us there was no freeze and told FTS there was a block on the account so they could not have the line(?).

We had five complaints that said the line was "blocked" and when we processed a freeze removal we were told the feature was not on the line. We spoke with one of those customers who told us she was trying to add long distance. We explained she could not do that. Shortly after that she migrated her line. We wonder if others were trying to add long distance not change local providers?

Two of the complaints the service had gone down prior to the complaint so the line was not frozen, it was disconnected.

One complaint the customer paid to have her service unsuspended on 12/31/01 at 10:00 p.m. We were not back in the office until 01/02/02 to even begin reconnection. By then she asked to have the service disconnected we did so, but she filed a complaint anyway.

In another complaint that involved Florida Telephone Service, the customer had migrated before we received the complaint that he could not migrate because of a freeze!

We also found 5 complaints that involved the agent we refer to in our letter. One complaint even stated that the agent told her to pay the \$10.00 and contact the PUC!