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McLean DS for HU

State of Florida



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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COMMISSION
CLERK

DATE: SEPTEMBER 19, 2002

TO: DIRECTOR, DIVISION OF THE COMMISSION
ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (M. WATTS) MW
DIVISION OF CONSUMER AFFAIRS (P. LOWERY) PL
OFFICE OF THE GENERAL COUNSEL (J. ELLIOTT) JE

RE: DOCKET NO. 020645-TI - COMPLIANCE INVESTIGATION OF UKI COMMUNICATIONS, INC. FOR APPARENT VIOLATION OF RULE 25-4.118, F.A.C., LOCAL, LOCAL TOLL, AND TOLL PROVIDER SELECTION.

AGENDA: 10/01/02 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\020645.RCM

CASE BACKGROUND

- March 2, 2000 - UKI Communications, Inc. (UKI) obtained Florida Public Service Commission (Commission) interexchange company (IXC) certificate number 7332.
- January 1, 2001, to June 24, 2002 - The Commission's Division of Consumer Affairs (CAF) received 230 consumer complaints against UKI.
- March 7, 2002 - UKI reported \$593,855.52 in gross intrastate operating revenues for calendar year 2001. The Commission's records indicate that UKI paid the appropriate 2001 Regulatory

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Assessment Fees (RAF) on this date, but did not pay the required penalty and interest due for payment remitted after the due date of January 30, 2002. Accordingly, UKI has an outstanding balance of \$106.89.

- July 31, 2002 - Staff determined that 162 consumer complaints (Attachment B) were apparent violations of Rule 25-4.118, Florida Administrative Code.

The Commission is vested with jurisdiction over these matters pursuant to Sections 364.01, 364.19, 364.285, 364.337, and 364.603 Florida Statutes. Further, staff's recommended penalty is consistent with penalties imposed upon other interexchange companies by the Commission in prior dockets for the same apparent rule violations. Accordingly, staff believes the following recommendations are appropriate.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission impose a penalty on UKI Communications, Inc. of \$10,000 per apparent violation, for a total of \$1,620,000, for 162 apparent violations of Rule 25-4.118, Florida Administrative Code, Local, Local Toll, or Toll Provider Selection?

RECOMMENDATION: Yes. The Commission should impose a penalty on UKI Communications, Inc. of \$10,000 per apparent violation, for a total of \$1,620,000, for 162 apparent violations of Rule 25-4.118, Florida Administrative Code. The penalty should be paid to the Florida Public Service Commission and forwarded to the Office of the Comptroller for deposit in the General Revenue Fund pursuant to Section 364.285(1), Florida Statutes. If the Commission's Order is not protested and if payment of the penalty is not received within 14 calendar days after the issuance of the Consummating Order, then Certificate No. 7332 should be canceled administratively. If UKI's certificate is cancelled in accordance with the Commission's Order from this recommendation, UKI should be required to immediately cease and desist providing IXC telecommunications services in Florida. (M. Watts/J. Elliott)

STAFF ANALYSIS: Rule 25-4.118, Florida Administrative Code, states that a customer's provider shall not be changed without the customer's authorization, it details acceptable methods of accomplishing a provider change, and it imposes authorization verification requirements on the provider seeking to acquire a customer. Rule 25-4.118, Florida Administrative Code, is provided as Attachment A.

Upon review of 230 complaints received against UKI during the period January 1, 2001, through June 24, 2002, staff determined that 162 are apparent unauthorized carrier changes (Attachment B). Staff discovered that none of the recordings of the third party verifications (TPVs) submitted by UKI in response to the complaints included all of the information required by Rule 25-4.118(2)(c), Florida Administrative Code. In other complaints, UKI did not provide any documentation that would prove that the customers authorized UKI to change their service provider.

Of the 162 apparent unauthorized carrier changes, staff believes that 47 of the complaints are apparent violations because UKI did not provide any proof, Letter of Agency (LOA) or TPV, that

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the customers authorized the company to change their service providers. In these cases, the company's responses to the customers' complaints indicated that the customer did authorize the change, but UKI apparently did not verify by LOA or TPV that the customer authorized the switch as required by Rule 25-4.118(2), Florida Administrative Code.

In four of the 162 apparent infractions, the TPV submitted by UKI was unintelligible and, therefore, did not demonstrate that the change was authorized.

Of the remaining 111 apparent infractions, the TPVs that UKI submitted to the Commission in response to staff's inquiries did not contain all of the information required by Rule 25-4.118(2)(c)2., Florida Administrative Code. Specifically, the TPV recordings were lacking the complete statements required by one or more of the following subsections: Rule 25-4.118(3)(a)1., 2., 4., and 5., Florida Administrative Code. Rule 25-4.118(3)(a)2., Florida Administrative Code, requires that the company clearly identify itself to the customer using its certificated name. In all of the TPVs reviewed by staff, the verifier identified the company as "United Communications." This name is not registered with the Commission or with the Florida Department of State. Also, in all of the TPVs reviewed by staff, the verifier asks the prospective customer if he or she is authorized to "use" the service. Rule 25-4.118(3)(a)3., Florida Administrative Code, requires that the verifier confirms that the person is authorized to request a "change" of providers. Staff believes that the word "use" in this context is distinctly different from the meaning of the word "change" as stated in the rule and is misleading to the prospective customers. Staff believes that without all of the required information on the TPV recording, the company has not complied with the rule and properly verified that the customers authorized the switch of their local toll or toll provider to UKI.

Staff believes UKI's conduct of slamming customers by failing to obtain appropriate authorization and verification in apparent violation of Commission Rule 25-4.118, Florida Administrative Code, is "willful" within the meaning and intent of Section 364.285, Florida Statutes. In Order No. 24306, issued April 1, 1991, in Docket No. 890216-TL titled In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C., Relating To Tax Savings Refund for 1988 and 1989 for GTE Florida, Inc., the Commission having found that the company had not intended to violate the rule,

nevertheless found it appropriate to order it to show cause why it should not be fined, stating that "[I]n our view, 'willful' implies intent to do an act, and this is distinct from intent to violate a statute or rule." Thus, any intentional act, such as UKI's conduct at issue here, would meet the standard for a "willful violation."

Section 364.285(1), Florida Statutes, authorizes the Commission to impose upon any entity subject to its jurisdiction a penalty for each offense of not more than \$25,000 for each offense, if such entity is found to have refused to comply with or to have willfully violated any lawful rule or order of the Commission, or any provision of Chapter 364, Florida Statutes. Utilities are charged with knowledge of the Commission's rules and statutes. Additionally, "[i]t is a common maxim, familiar to all minds that 'ignorance of the law' will not excuse any person, either civilly or criminally." Barlow v. United States, 32 U.S. 404, 411 (1833).

Based on the foregoing, staff recommends that the Commission should impose a penalty on UKI Communications, Inc. of \$10,000 per apparent violation, for a total of \$1,620,000, for 162 apparent violations of Rule 25-4.118, Florida Administrative Code. The penalty should be paid to the Florida Public Service Commission and forwarded to the Office of the Comptroller for deposit in the General Revenue Fund pursuant to Section 364.285(1), Florida Statutes. If the Commission's Order is not protested and if payment of the penalty is not received within 14 calendar days after the issuance of the Consummating Order, then Certificate No. 7332 should be canceled administratively. If UKI's certificate is cancelled in accordance with the Commission's Order from this recommendation, UKI should be required to immediately cease and desist providing IXC telecommunications services in Florida.

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ISSUE 2: Should this docket be closed?

RECOMMENDATION: The Order issued from this recommendation will become final upon issuance of a Consummating Order, unless a person whose substantial interests are affected by the Commission's decision files a protest within 21 days of the issuance of the Proposed Agency Action Order. This docket should then be closed administratively upon either receipt of the payment of the penalty, or upon cancellation of Certificate No. 7332 if the penalty is not paid within fourteen calendar days after issuance of the Consummating Order. (J. Elliott)

STAFF ANALYSIS: The Order issued from this recommendation will become final upon issuance of a Consummating Order, unless a person whose substantial interests are affected by the Commission's decision files a protest within 21 days of the issuance of the Proposed Agency Action Order. This docket should then be closed administratively upon either receipt of the payment of the penalty, or upon cancellation of Certificate No. 7332 if the penalty is not paid within fourteen calendar days after issuance of the Consummating Order.

25-4.118 Local, Local Toll, or Toll Provider Selection.

(1) The provider of a customer shall not be changed without the customer's authorization. The customer or other authorized person may change the residential service. For the purposes of this section, the term "other authorized person" shall mean a person 18 years of age or older within the same household. The person designated as the contact for the local telecommunications company, an officer of the company, or the owner of the company is the person authorized to change business service. A LEC shall accept a provider change request by telephone call or letter directly from its customers; or

(2) A LEC shall accept a change request from a certified LP or IXC acting on behalf of the customer. A certificated LP or IXC shall submit a change request only if it has first certified to the LEC that at least one of the following actions has occurred:

(a) The provider has a letter of agency (LOA), as described in subsection (3), from the customer requesting the change;

(b) The provider has received a customer-initiated call, and beginning six months after the effective date of this rule has obtained the following:

1. The information set forth in subparagraphs (3)(a)1. through 5.; and
2. Verification data including at least one of the following:
 - a. The customer's date of birth;
 - b. The last four digits of the customer's social security number; or
 - c. The customer's mother's maiden name.

(c) A firm that is independent and unaffiliated with the provider claiming the subscriber has verified the customer's requested change by obtaining the following:

1. The customer's consent to record the requested change or the customer has been notified that the call will be recorded; and
2. Beginning six months after the effective date of this rule an audio recording of the information stated in subparagraphs (3)(a)1. through 5.; or

(d) 1. The provider has received a customer's change request, and has responded by mailing an informational package that shall include the following:

- a. A notice that the information is being sent to confirm that a customer's request to change the customer's telecommunications provider was obtained;
- b. A description of any terms, conditions, or charges that will be incurred;
- c. The name, address, and telephone number of both the customer and the soliciting company;
- d. A postcard which the customer can use to confirm a change request;
- e. A clear statement that the customer's local, local toll, or toll provider will be changed to the soliciting company only if the customer signs and returns the postcard confirming the change; and
- f. A notice that the customer may contact by writing the Commission's Division of Consumer Affairs, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, or by calling, toll-free (TDD & Voice) 1(800)342-3552, for consumer complaints.

2. The soliciting company shall submit the change request to the LP only if it has first received the postcard that must be signed by the customer.

(3) (a) The LOA submitted to the company requesting a provider change shall include the following information (Each shall be separately stated):

1. Customer's billing name, address, and each telephone number to be changed;
2. Statement clearly identifying the certificated name of the provider and the service to which the customer wishes to subscribe, whether or not it uses the facilities of another company;
3. Statement that the person requesting the change is authorized to request the change;
4. Statement that the customer's change request will apply only to the number on the request and there must only be one presubscribed local, one presubscribed local toll, and one presubscribed toll provider for each number;
5. Statement that the LEC may charge a fee for each provider change;
6. Customer's signature and a statement that the customer's signature or endorsement on the document will result in a change of the customer's provider.

(b) The soliciting company's provider change fee statement, as described in subparagraph (a)5. above, shall be legible, printed in boldface at least as large as any other text on the page, and located directly above the

signature line.

(c) The soliciting company's provider change statement, as described in subparagraph (a)6. above, shall be legible, printed in boldface at least as large as any other text on the page, and located directly below the signature line.

(4) The LOA shall not be combined with inducements of any kind on the same document. The document as a whole must not be misleading or deceptive. For purposes of this rule, the terms "misleading or deceptive" mean that, because of the style, format or content of the document or oral statements, it would not be readily apparent to the person signing the document or providing oral authorization that the purpose of the signature or the oral authorization was to authorize a provider change, or it would be unclear to the customer who the new provider would be; that the customer's selection would apply only to the number listed and there could only be one long distance service provider for that number; or that the customer's LP might charge a fee to switch service providers. If any part of the LOA is written in a language other than English, then it must contain all relevant information in each language. Notwithstanding the above, the LOA may be combined with checks that contain only the required LOA language as prescribed in subsection (3) of this section and the information necessary to make the check a negotiable instrument. The LOA check shall not contain any promotional language or material. The LOA check shall contain in easily readable, bold-face type on the front of the check, a notice that the consumer is authorizing a primary carrier change by signing the check. The LOA language shall be placed near the signature line on the back of the check.

(5) A prospective provider must have received the signed LOA before initiating the change.

(6) Information obtained under paragraphs (2)(a) through (d) shall be maintained by the provider for a period of one year.

(7) Customer requests for other services, such as travel card service, do not constitute a provider change.

(8) Charges for unauthorized provider changes and all 1+ charges billed on behalf of the unauthorized provider for the first 30 days or first billing cycle, whichever is longer, shall be credited to the customer by the company responsible for the error within 45 days of notification to the company by the customer, unless the claim is false. After the first 30 days up to 12 months, all 1+ charges over the rates of the preferred company will be credited to the customer by the company responsible for the error within 45 days of notification to the company by the customer, unless the claim is false. Upon notice from the customer of an unauthorized provider change, the LEC shall change the customer back, or to another company of the customer's choice. The change must be made within 24 hours excepting Saturday, Sunday, and holidays, in which case the change shall be made by the end of the next business day. The provisions of this subsection apply whether or not the change is deemed to be an authorized carrier change infraction under subsection (13).

(9) The company shall provide the following disclosures when soliciting a change in service from a customer:

- (a) Identification of the company;
- (b) That the purpose of the visit or call is to solicit a change of the provider of the customer;
- (c) That the provider shall not be changed unless the customer authorizes the change; and
- (d) All information as referenced in subsection 25-24.490(3), F.A.C.

(10) During telemarketing and verification, no misleading or deceptive references shall be made while soliciting for subscribers.

(11) A provider must provide the customer a copy of the authorization it relies upon in submitting the change request within 15 calendar days of request.

(12) Each provider shall maintain a toll-free number for accepting complaints regarding unauthorized provider changes, which may be separate from its other customer service numbers, and must be answered 24 hours a day, seven days a week. If the number is a separate toll-free number, beginning six months after the effective date of this rule new customers must be notified of the number in the information package provided to new customers or on their first bill. The number shall provide a live operator or shall record end user complaints made to the customer service number to answer incoming calls. A combination of live operators and recorders may be used. If a recorder is used, the company shall attempt to contact each complainant no later than the next business day following the date of recording and for three subsequent days unless the customer is reached. If the customer is not reached, the company shall send a letter to the customer's billing address informing the customer as to the best time the customer should call or provide an address to which correspondence should be sent to the company. Beginning six months after the effective date of this rule, a minimum of 95 percent of all call attempts shall be transferred by the system to a live attendant or recording device prepared to give immediate assistance within 60 seconds after the last digit of the telephone number listed as the customer service number for unauthorized provider change complaints was dialed; provided that if the call is completed within 15 seconds to an interactive, menu-driven, voice response unit, the 60-second answer time shall be measured from the point at which the customer selects a menu option to be connected to a live attendant. Station busies will not be counted as completed calls. The term "answer" as used in this subsection means more than an acknowledgment that the customer is waiting on the line. It shall mean the provider is ready to render assistance or accept the information

necessary to process the call.

(13) (a) A company shall not be deemed to have committed an unauthorized carrier change infraction if the company, including its agents and contractors, did the following:

1. Followed the procedures required under subsection (2) with respect to the person requesting the change;
2. Followed these procedures in good faith; and
3. Complied with the credit procedures of subsection (8).

(b) In determining whether fines or other remedies are appropriate for an unauthorized carrier change infraction, the Commission shall consider the actions taken by the company to mitigate or undo the effects of the unauthorized change. These actions include but are not limited to whether the company, including its agents and contractors:

1. Followed the procedures required under subsection (2) with respect to the person requesting the change in good faith;
 2. Complied with the credit procedures of subsection (8);
 3. Took prompt action in response to the unauthorized change;
 4. Reported to the Commission any unusual circumstances that might have adversely affected customers such as system errors or inappropriate marketing practices that resulted in unauthorized changes and the remedial action taken;
 5. Reported any unauthorized provider changes concurrently affecting a large number of customers;
- or
6. Took other corrective action to remedy the unauthorized change appropriate under the circumstances.

Specific Authority 350.127(2) FS. Law Implemented 364.01, 364.19, 364.285, 364.603 FS. History—New 3-4-92, Amended 5-31-95, 12-28-98

UNAUTHORIZED CARRIER CHANGE

| | BTN | NAME | COMPLAINT NO. |
|----|--------------|-------------------------|---------------|
| 1 | 727-539-6974 | WANDA ORRIOLA | 353387T |
| 2 | 813-889-9135 | WANDA RAMIREZ | 353565T |
| 3 | 305-948-8318 | VERONICA J. MELENDEZ | 358166T |
| 4 | 561-686-5053 | ALEJANDRO RESENDIZ | 358979T |
| 5 | 305-553-9549 | RUSSELL BARNES | 359933T |
| 6 | 407-344-0973 | ROSE GONZALES | 361543T |
| 7 | 305-685-1403 | LEONEL ALFONSO | 361881T |
| 8 | 305-936-9120 | VITO CANDELA | 362825T |
| 9 | 305-823-8133 | EVA RODRIGUEZ | 364766T |
| 10 | 305-557-5043 | ERNESTO DARIAS | 365775T |
| 11 | 863-452-0867 | WILFREDO RODRIGUEZ | 365968T |
| 12 | 954-450-6396 | MARIA DIAZ | 366853T |
| 13 | 407-321-3480 | JAIME ORDONEZ | 367578T |
| 14 | 305-289-8959 | AUGUSTIN SARDINA | 369450T |
| 15 | 305-551-3746 | JOSE L PEREZ | 369665T |
| 16 | 305-225-0599 | MARIANO PENA | 370276T |
| 17 | 954-443-7759 | VINCENT GARCIA | 370693T |
| 18 | 305-640-1159 | DAVID I COHEN | 371469T |
| 19 | 954-447-1067 | CARLOS ANTUNEZ | 371937T |
| 20 | 305-529-5195 | BRUNILDA URTIAGA | 372670T |
| 21 | 305-228-7420 | ENRIQUE MARTIN | 372924T |
| 22 | 305-825-7965 | ALMA REYES | 373240T |
| 23 | 305-940-5074 | RAFAEL CARDONA | 373446T |
| 24 | 407-696-6330 | CARMEN M DE JESUS | 373698T |
| 25 | 407-295-4748 | ROBERT D FROATS | 374047T |
| 26 | 305-443-8954 | RAMONE CROS | 374188T |
| 27 | 863-816-9551 | JOSEPH CARUCCI | 374204T |
| 28 | 352-465-2565 | BERL PARRISH | 374381T |
| 29 | 941-403-0725 | FRANCISCO ROSARIO | 374417T |
| 30 | 954-429-2792 | FRANCISCO PADRON | 375048T |
| 31 | 352-402-0539 | SANDRA E RIOS | 375229T |
| 32 | 954-447-3970 | ERIKA S NAVARRO | 375917T |
| 33 | 305-386-1403 | MARCOS R PIMENTEL | 376183T |
| 34 | 863-471-0582 | SANTA PEREZ | 376856T |
| 35 | 941-389-2944 | ELLEN & JORGE FERNANDEZ | 377610T |
| 36 | 863-767-0856 | VIDAL REYES | 378590T |
| 37 | 305-754-1696 | MARIANO C CALERO | 378626T |
| 38 | 305-652-4698 | MICHELLE CARDENAS | 378820T |
| 39 | 561-750-6932 | FAYE BERNSTEIN | 379149T |
| 40 | 954-733-0817 | EILEEN BALCAN | 379153T |
| 41 | 407-331-6505 | JOSEFA DELGADO | 379417T |
| 42 | 305-325-8317 | LUCIA GARCIA | 379539T |

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UNAUTHORIZED CARRIER CHANGE

| | BTN | NAME | COMPLAINT NO. |
|----|--------------|------------------------------|---------------|
| 43 | 305-480-8144 | EDUARDO J MARTINEZ | 382953T |
| 44 | 305-858-5375 | MARIA D SERNADEZ | 385258T |
| 45 | 305-836-3786 | RAUL CORDOBA, SR. | 385948T |
| 46 | 305-598-9376 | MICHAEL MERRITT | 386534T |
| 47 | 954-432-3785 | JOSE' ESTRELLA | 387014T |
| 48 | 305-279-2371 | LORETTA TOCA | 387181T |
| 49 | 850-907-0104 | EDGAR ENCISO | 395267T |
| 50 | 305-823-8133 | EVA RODRIGUEZ | 395315T |
| 51 | 954-217-9758 | RODRIGO MONTENEGRO | 396826T |
| 52 | 305-541-6619 | SANTO LOPEZ | 400918T |
| 53 | 386-774-8491 | CARLOS J VIRUET | 401055T |
| 54 | 305-827-6901 | HERNAN GARCIA | 402746T |
| 55 | 727-736-5335 | MILLICANT ZERON | 402897T |
| 56 | 386-789-4741 | ISMEAL VEGA | 403496T |
| 57 | 305-663-3009 | ASSOCIATES INTERPRETERS, INC | 404394T |
| 58 | 407-348-0318 | ANTONIO VASQUEZ | 405128T |
| 59 | 954-450-0994 | VERONICA BAUTISTA | 405455T |
| 60 | 407-816-5568 | SUSAN ROMAN | 406512T |
| 61 | 813-961-3856 | ABDON RODRIGUEZ | 406668T |
| 62 | 941-455-2417 | NICOLE TONNESSEN | 406995T |
| 63 | 561-597-3661 | MARIA ISABEL FERNANDEZ | 407257T |
| 64 | 407-523-7238 | MICHAEL ACEVEDO | 407497T |
| 65 | 352-754-5099 | SONIA TOBAR | 407597T |
| 66 | 407-343-5361 | JOSE ALVARADO | 407603T |
| 67 | 954-474-4617 | EFRAIN RODRIGUEZ | 407986T |
| 68 | 863-491-1418 | BENITO CORONA | 408209T |
| 69 | 407-348-8892 | ELIAS DELGADO | 408305T |
| 70 | 813-962-1196 | ROBERTO VILLIALBA | 408362T |
| 71 | 954-796-1236 | ROBERTO OJALVO | 408380T |
| 72 | 941-304-0273 | MAGALLY VARGAS | 408674T |
| 73 | 321-951-1760 | NAOMI RAMIREZ | 408782T |
| 74 | 407-933-1487 | LAURA SOTO | 408804T |
| 75 | 407-539-1637 | LYNWOOD PEREZ | 408864T |
| 76 | 305-628-8481 | KARINA REYES | 408870T |
| 77 | 954-452-0852 | MARIA CRUZ | 409344T |
| 78 | 954-893-0861 | ORESTES GENER | 410226T |
| 79 | 954-704-9330 | JOEL CASTRO | 410311T |
| 80 | 407-933-6879 | RAFAEL NAZARIO | 410393T |
| 81 | 954-389-1578 | JOSE RODRIGUEZ | 410421T |
| 82 | 561-641-5758 | PILAR COLOMINA | 410453T |
| 83 | 305-480-8252 | ALBERTO AGUDIN | 410534T |
| 84 | 305-380-9967 | JOSE R PEREZ | 410592T |

UNAUTHORIZED CARRIER CHANGE

| | BTN | NAME | COMPLAINT NO. |
|-----|--------------|----------------------|---------------|
| 85 | 407-931-1890 | RAUL AND BETTY COLON | 410760T |
| 86 | 850-386-3432 | MICHELLE DAVILA | 411019T |
| 87 | 305-412-2193 | ALFONSO FERNANDEZ | 411222T |
| 88 | 305-225-0867 | ARISTIDES MARTINEZ | 411708T |
| 89 | 305-531-0214 | JORGE PEREZ | 411980T |
| 90 | 954-565-4639 | JOSE RODRIGUEZ | 412072T |
| 91 | 941-275-4338 | ALFREDO ARCILA | 412113T |
| 92 | 954-442-2637 | YVETTE MELENDEZ | 412234T |
| 93 | 941-743-3770 | ELSA DIEQUEZ | 412540T |
| 94 | 954-741-4693 | ILSY L PICHON BLACK | 412951T |
| 95 | 941-433-2772 | ALFREDO BARETO | 413750T |
| 96 | 954-894-4050 | SAM MANCUSO | 413779T |
| 97 | 954-433-3424 | LINO QUINTERO | 414873T |
| 98 | 352-429-9625 | ELIZABETH RIVERA | 415244T |
| 99 | 954-385-5966 | MAGALY ANSELMI | 415884T |
| 100 | 407-518-7539 | EDGAR GONZALEZ | 416162T |
| 101 | 954-739-7579 | IDAH COSTA | 416451T |
| 102 | 407-678-9416 | MANUELA RAMIEREZ | 416495T |
| 103 | 305-408-7232 | ENRIQUE ARTALEJO | 416654T |
| 104 | 305-233-5371 | MARK MORALES | 416912T |
| 105 | 305-947-3707 | GILBERTO MOREJON | 417353T |
| 106 | 305-969-5296 | MAIRA REY-SEARA | 417419T |
| 107 | 954-796-1236 | ROBERTO OJALVO | 418012T |
| 108 | 407-846-2604 | WILBERTO BEAUCHAMP | 418026T |
| 109 | 305-628-1541 | ANTONIO SALGADO | 418218T |
| 110 | 813-987-9459 | ANTONIA MORALES | 418342T |
| 111 | UNKNOWN | RAMON GALEGO | 418420T |
| 112 | 850-682-8316 | RAUL CAMPA | 418516T |
| 113 | 305-826-8597 | CONSUELO SEGARRA | 419132T |
| 114 | 407-859-5750 | RANDALL VOIT | 420067T |
| 115 | 305-863-2772 | JOSE A ABIN | 420514T |
| 116 | 954-432-3446 | JOSE TAGLE | 420725T |
| 117 | 305-255-6111 | KIP RABIN | 422198T |
| 118 | 407-862-4204 | DIEGO SALDARRIAGA | 422231T |
| 119 | 386-574-2410 | KENNETH G GATZKE | 422242T |
| 120 | 863-465-5243 | SIMON RODRIGUEZ | 422543T |
| 121 | 305-633-4868 | HECTOR MAJANO | 422673T |
| 122 | 305-221-1353 | CIRO PINEDA | 422697T |
| 123 | 954-581-6693 | LIBARDO COLORADO | 423107T |
| 124 | 954-677-9566 | GRACIELA RAMOS | 423234T |
| 125 | 954-961-7488 | DORIS TRUJILLO-PARRA | 423282T |
| 126 | 305-662-6729 | PEDRO LLORENS | 423431T |

UNAUTHORIZED CARRIER CHANGE

| | BTN | NAME | COMPLAINT NO. |
|-----|--------------|---------------------------|---------------|
| 127 | 954-456-4448 | PETER PRADO | 424892T |
| 128 | 305-866-0369 | VICTORIA HOYAS | 425105T |
| 129 | 305-667-2488 | MARGARITA DEL CAMPO | 425457T |
| 130 | 305-947-9992 | FELCY A SANTIAGO | 425739T |
| 131 | 407-870-2614 | JOSE MOLINA | 426429T |
| 132 | 352-332-2538 | AGUSTIN CORBELLA | 426509T |
| 133 | 305-935-6878 | CRISTIANE TAKITA | 427565T |
| 134 | 561-362-5932 | MARIANELA UBILLA | 428151T |
| 135 | 407-658-6472 | JOSE' A RAMOS | 428536T |
| 136 | 305-231-7521 | AURORA FERNANDEZ | 428640T |
| 137 | 305-944-7834 | JORGE P JAUREGUI | 429214T |
| 138 | 305-554-6095 | OSCAR R PALOMO | 430864T |
| 139 | 305-554-8197 | SERGIO GUZMAN | 431537T |
| 140 | 407-847-5161 | ELIAS SUAREZ | 432284T |
| 141 | 407-339-5941 | HECTOR LOPEZ | 433112T |
| 142 | 305-558-5534 | EMILIANO PELAEZ | 433309T |
| 143 | 850-216-2280 | EDMUNDO MEDINA | 433536T |
| 144 | 305-443-2782 | ELBA GARCIA | 433952T |
| 145 | 305-228-4323 | PABLO ZAMORA | 435102T |
| 146 | 407-831-6650 | GRIMI ORTIZ | 436970T |
| 147 | 305-819-4471 | JUAN A GALAN-DE-LA-FUENTE | 437396T |
| 148 | 352-624-9190 | DAVID BALL | 438664T |
| 149 | 305-223-0847 | MARTA QUESADA | 440292T |
| 150 | 305-971-2149 | TERESA DELGADO | 443349T |
| 151 | 305-221-9822 | JORGE RODRIGUEZ | 443733T |
| 152 | 407-696-4058 | DENNIS DAVILA | 445042T |
| 153 | 305-819-9941 | MARIA LAVASTIDA | 446529T |
| 154 | 305-885-1394 | MARTA QUESADA | 448059T |
| 155 | 813-889-9412 | DELORES LEYVA | 448649T |
| 156 | 407-370-3144 | JOSE RAMIREZ | 449323T |
| 157 | 954-463-3661 | RICARDO ESTRADA | 449891T |
| 158 | 239-793-8564 | PATRICIA VASQUEZ | 450883T |
| 159 | 305-825-2670 | EFRAIN PADILLA | 451640T |
| 160 | 305-235-2692 | JORGE I RIVERA | 452118T |
| 161 | 407-870-2526 | MUSTAFIZ MOTIWALA | 452415T |
| 162 | 305-829-1881 | DAVID RODRIGUEZ | 452827T |