

ORIGINAL

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July 25, 2003

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **030349-TP (Supra \$75 Cash Back Promotion)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Ronald Pate, John A. Ruscilli, Tamra Schoeche, Michelle N. Summers, and Edward Wolfe, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*E. Earl Edenfield, Jr.*  
E. Earl Edenfield, Jr. (KA)

Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

*Pate - 06747-03*  
*Ruscilli - 06748-03*  
*Schoeche - 06749-03*  
*Summers/Wolfe - 06750-03*

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CAF \_\_\_\_\_  
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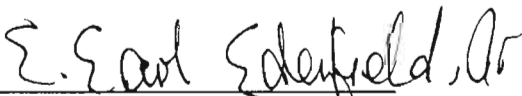
**CERTIFICATE OF SERVICE  
DOCKET NO. 030349-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 25th day of July, 2003 to the following:

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E. Earl Edenfield, Jr.  
E. Earl Edenfield, Jr. (KA)

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF TAMRA SCHOECH  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 030349-TP  
5 JULY 25, 2003  
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH  
8 TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR BUSINESS  
9 ADDRESS.  
10

11 A. My name is Tamra Schoech. I am employed by BellSouth as a Database  
12 Marketing Manager for BellSouth's Small Business Services organization. My  
13 address is 1055 Lenox Park Blvd., Atlanta, GA 30319.  
14

15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND  
16 AND EXPERIENCE.  
17

18 A. I graduated from the University of Southern Mississippi, in 1977 with a BS  
19 degree. I joined the South Central Bell sales organization in 1977. Following  
20 subsequent assignments in Network Planning, I worked for Bell Communications  
21 Research, Inc. ("BellCore") as a training developer and instructor from 1984  
22 through 1987. Returning to BellSouth in 1988, I worked in Strategic Planning,  
23 Market Research, and Small Business Services. I assumed my current position in  
24 1996.  
25

1  
DOCUMENT NUMBER: 030349-TP  
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1 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2

3 A. The purpose of my rebuttal testimony is to respond to the testimony of Mr. David  
4 A. Nilson filed on June 27, 2003 on behalf of Supra Telecommunications and  
5 Information Systems, Inc. (“Supra”). Specifically, I address how BellSouth  
6 Telecommunications Small Business Services identifies former BellSouth retail  
7 business customers for local service reacquisition programs.

8

9 Q. WHAT PROCESS IS USED TO IDENTIFY FORMER BELLSOUTH RETAIL  
10 CUSTOMERS FOR REACQUISITION?

11

12 A. BellSouth retail information is used to develop a list of retail customer locations  
13 where service with BellSouth has been disconnected. Customer locations where  
14 the retail disconnect codes indicate a non-competitive reason for disconnecting  
15 service (such as going out of business, bankruptcy, or lines no longer needed) are  
16 then removed from this list. The remaining customer locations are assumed to be  
17 customer sites that switched to a local access line provider other than BellSouth.  
18 BellSouth’s retail data on the former customer prior to disconnect is then used to  
19 identify which of these former customers might meet eligibility requirements of  
20 promotions available at the time former retail business customers are solicited to  
21 purchase BST retail services. The retail disconnect date is checked to make sure  
22 at least 10 days have elapsed since disconnect date prior to any customer contact  
23 for retail sales.

24

25

1 Q. IS THIS PROCESS AN EXACT SCIENCE?

2

3 A. No. This process results in the inclusion of some disconnects that are not due to  
4 competitive activity. This might occur due to incorrectly coded disconnects and  
5 disconnects not carrying any disconnect reason code on the billing record.

6

7 Q WHAT IS THE SOURCE OF THE DATA USED TO IDENTIFY  
8 REACQUISITION PROSPECTS?

9

10 A. Two sources of data are used.

11

12 One source of the data is a monthly snapshot of the retail bills of the customers  
13 served by BellSouth's Small Business Services unit. The second data source is  
14 retail service order data in Harmonize. These data are sent to a vendor that  
15 maintains a database that it uses to create customer lists used for telemarketing,  
16 direct mail, email, and market research programs. At BellSouth's direction, this  
17 vendor uses the process described above to create lists of small businesses for  
18 reacquisition.

19

20 Q. WHAT CUSTOMER INFORMATION MIGHT BE PROVIDED TO SALES  
21 REPRESENTATIVES WITH A LIST OF FORMER RETAIL CUSTOMERS?

22

23 A. With a list of eligible customers identified from the marketing database, sales  
24 representatives utilizing the promotion would only be provided information  
25 pertaining to retail services the customer had purchased from BellSouth prior to

1 the disconnect. Unless provided to BellSouth by the small business, there is no  
2 information regarding which competitor the small business switched to, what  
3 services the small business is purchasing from that competitor, or what the small  
4 business is paying for any service it may be receiving from a competitor.

5

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8

9 A. Yes, it does.

10

11