



RECEIVED-FPSC

12 MAR 14 AM 11:59

COMMISSION CLERK

**Susan J. Berlin**  
Counsel, Regulatory Affairs

Sprint Nextel  
GAATLD0704  
3065 Akers Mill Rd., S.E., 7th Floor  
Atlanta, GA 30339

**REDACTED**

- claim of confidentiality
- notice of intent
- request for confidentiality
- filed by OPC

**Via FedEx Delivery**

For DN 01499-12, which is in locked storage. You must be authorized to view this DN.-CLK

March 13, 2012

Judy Harlow  
c/o Ann Cole  
Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

12 MAR 14 02:11:55

**Re: Industry survey for legislative review of agency rules in effect on or before November 16, 2010  
Docket No. 110303-OT**

Dear Ms. Harlow:

Pursuant to Rule 25-22.006(5), Florida Administrative Code, Sprint Communications Company L.P. ("Sprint") hereby files its responses to the data requests received in this matter. Enclosed for filing are the following:

1. Confidential Attachment A: a sealed envelope marked "CONFIDENTIAL," containing Sprint's unredacted responses to data requests received on February 24, 2012 in this matter.
2. Public Attachment B: a redacted version of Sprint's responses shown in Confidential Attachment A, as required by Rule 25-22.006(5), Florida Administrative Code. In this public version, Sprint has redacted its response to data requests 1a, 1b, 1c, 8, 12a, and 17.

COM \_\_\_\_\_  
 APA \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL \_\_\_\_\_  
 RAD \_\_\_\_\_  
 SRC \_\_\_\_\_  
 ADM \_\_\_\_\_  
 OPC \_\_\_\_\_  
 CLK 1

Office: (404) 649-8983 Fax: (404) 649-8980

DOCUMENT NUMBER-DATE

01498 MAR 14 12

FPSC-COMMISSION CLERK

Pursuant to §364.183(1), Florida Statutes, Sprint claims that the contents of Attachment A are confidential and proprietary business information of Sprint that should be kept confidential and exempt from public disclosure.

Thank you for your assistance in this matter. Please date stamp the enclosed additional copy of this letter as "filed" and return the same to my office. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Susan J. Berlin".

Susan J. Berlin

1. What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011?
  - a. For the five year period beginning July 1, 2011, which requirements of Rule 25-22.032, F.A.C., if any, would be performed by the Company assuming the rule were not in effect? Please explain.
  - b. For each of the requirements identified in 1 a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011 ?
  - c. What are your actual transactional costs resulting from your Company's compliance with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011?

**Response**

Sprint estimates its transactional costs for compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011 to be approximately [REDACTED]

- a) [REDACTED]
- b) [REDACTED]
- c) [REDACTED]

2. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011 ?
3. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?
4. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011 ?
5. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the company's service territory?
6. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other

than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

**Response**

Sprint does not possess any information that is responsive to questions 2 - 6.

7. What does the Company believe are the benefits of Rule 25-22.032, F.A.C.?

**Response**

The rule establishes a clear procedure with explicit expectations for all sides regarding the handling of consumer complaints in Florida

8. Assuming Rule 25-22.032, F.A.C., is unchanged over the next five years, do you expect your Company's costs to comply with the rule going forward, to increase, decrease, or remain the same. Please explain your response.

**Response**



9. Does your Company currently have procedures/personnel in place to address complaints received directly from your consumers?

**Response**

Yes.

10. If Rule 25-22.032, F.A.C., were repealed would your Company continue to accept and address consumer complaints? Please explain your response.

**Response**

Yes. Sprint is fully committed to customer satisfaction and will continue to work to address/respond to customer concerns in a timely and fair manner.

11. Do you believe the costs, if any, incurred by your Company to comply with the records retention, reporting, and auditing requirements of Rule 25-22.032(10), F.A.C., for the five year period beginning July 1, 2011, if any, have an adverse impact on your Company? If so, please provide any and all data which supports your response.


**Response**

No adverse impact.

12. Of the transactional costs estimated to be associated with compliance with 25-22.032, F.A.C., what percentage is spent on the following items:
- Staffing
  - Document storage and retention
  - Postage and shipping
  - Communications (dedicated phone lines, emails or faxes)
  - Other

**Response**

Sprint estimates the transactional cost for 5 year compliance beginning July 1, 2011 to be as follows:

- 
- Document retention and storage - minimal
- Postage and Shipping – zero to minimal given that most complaints are resolved via email and telephone.
- Communications costs - minimal
- Other – n/a

13. How many staff members at your Company are currently responsible for handling consumer complaints associated with 25-22.032, F.A.C.?
- Are they full time employees?
  - Do these employees have responsibilities apart from handling complaints?

**Response**

Sprint has four full-time analysts who support Florida Public Service Commission referrals. In addition, they have other responsibilities not related to Florida.

- Yes, they are full time employees.
- Yes, they have responsibilities apart from handling complaints.

14. Section 3 of Rule 25-22.032, F.A.C., states that a customer's service shall not be discontinued during the complaint resolution process. Have there been instances within 2010 through 2011, when your Company was uncompensated for service provided as a result of a billing dispute?

- In the majority of these cases, is the Company able to recoup these costs after the complaint is resolved?

**Response**

While Sprint does not have a specific number to report, it is reasonable to say that Sprint was uncompensated for some services rendered between 2010 and 2011 by some customers even after their complaint was addressed/resolved.

- a. Sprint lacks specific information that is responsive to this question.

15. Does your Company subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system?

a. What are the annual costs associated with subscription to these systems, including costs due to additional requirements for staffing, operating hours and document retention?

**Response**

Yes. Sprint has actively participated in the transfer-connect and email transfer programs since 2001. There have been no additional operating costs on an annual basis since inception of the program.

16. Approximately what percentage of complaints are resolved prior to reaching the Informal Conference stage described in section 8 of Rule 25-22.032, F.A.C.?

a. How many times has your Company had a consumer complaint that has escalated all the way to the informal conference stage in the previous two years?  
b. How many times within 2010 through 2011, has your Company had a complaint process that was escalated beyond the informal conference stage?

**Response**

Since 2008, Sprint continues to resolve 100% of complaints prior to reaching the Informal Conference Stage described in section 8 of Rule 25-22-032, F.A.C.

a. In the past two years, Sprint has not had any consumer complaints that escalated to the informal conference stage.

b. For the period 2010 through 2011, Sprint has not had any complaint processes that were escalated beyond the informal conference stage.

17. Approximately what percentage of complaints from your customers filed with the Florida Public Service Commission are successfully resolved within 30 days?

**Response**

[REDACTED]

18. How has Rule 25-22.032, F.A.C., affected the way your Company processes complaints?

a. Has the rule had a positive, negative, or neutral impact on your Company?  
b. How has the rule affected the Company's cost of handling complaints?



**Response**

Rule 25-22.032 has had little effect and a neutral impact on the way Sprint processes complaints.

- a. The rule has had a neutral effect.
- b. The rule has had little if any effect on Sprint's cost of handling complaints.