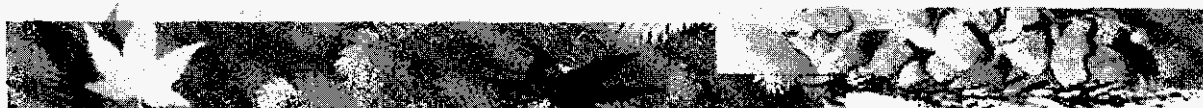


Eric Fryson

From: Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]
Sent: Wednesday, March 14, 2012 2:32 PM
To: Filings@psc.state.fl.us
Cc: O'Roark, Dulaney L
Subject: Docket No. 110303-OT - Verizon Florida LLC's Responses to Rule 25-22.032, F.A.C. Survey Questions
Attachments: 110303 VZ FL Responses to survey 3-14-12.pdf



The attached is submitted for filing on behalf of Verizon Florida LLC by

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The attached document consists of a total of 6 pages - cover letter (1 page) and Responses (5 pages).

Terry Scobie
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3/14/2012

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

Dulaney L. O'Roark III
General Counsel-Southern Region
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March 14, 2012 – VIA ELECTRONIC MAIL

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

Re: Docket No. 110303-OT
Section 120.745, F.S. (2011), Legislative review of agency rules in effect on or
before November 16, 2010

Dear Ms. Harlow:

Please find enclosed Verizon Florida LLC's Responses To Rule 25-22.032, F.A.C.
Survey Questions. If there are any questions regarding this filing, please contact me at
(678) 259-1657.

Sincerely,

s/Dulaney L. O'Roark III

Dulaney L. O'Roark III

tas

Enclosure

DOCUMENT NUMBER DATE

01511 MAR 14 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Section 120.745, F.S. (2011), Legislative
review of agency rules in effect on or before)
November 16, 2010)
_____)

Docket No. 110303-OT
Filed: March 14, 2012

**VERIZON FLORIDA LLC'S RESPONSES TO
RULE 25-22.032, F.A.C. SURVEY QUESTIONS**

Verizon Florida LLC ("Verizon") responds as follows to the survey questions in Staff's memorandum in this docket dated February 24, 2012.

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.

RESPONSE: Verizon would continue to receive and address complaints from customers and prospective customers concerning the Lifeline program if the rule were not in effect.

- b. For each of the requirements identified in 1a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011?

RESPONSE: Verizon does not track such transactional costs in the normal course of its business, but such costs are expected to be relatively low.

- 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: Verizon does not track such transactional costs in the normal course of its business, but such costs probably were relatively low.

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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?

RESPONSE: Because Lifeline is a program that serves residential customers, there would be no impact on small businesses.

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?

RESPONSE: Because Lifeline is a program that serves residential customers, there would be no impact on small counties and small cities.

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?

RESPONSE: Because Lifeline is a program that serves residential customers, there would be no impact on other entities in Verizon's service territory.

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?

RESPONSE: To Verizon's knowledge, the rule does not have a significant impact on economic growth, private sector job creation or employment, and private sector investment.

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: Verizon is not aware of any significant impact of the rule on business competitiveness.

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

RESPONSE: The rule provides another avenue for customers to use to reach the company to address complaints concerning the Lifeline program, but Verizon will address these complaints if customers send or call them in to Verizon directly.

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: Verizon does not track its compliance costs in the normal course of its business and does not know whether those costs will increase, decrease or stay the same over the next five years.

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. Verizon will continue to respond to consumer complaints sent or called in to the company.

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: Verizon does not track such compliance costs in the normal course of its business, but such costs are expected to be relatively low.

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:

- a. Staffing
- b. Document storage and retention
- c. Postage and shipping
- d. Communications (dedicated phone lines, emails or faxes)
- e. Other

RESPONSE: Verizon does not track such compliance costs in the normal course of its business.

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

RESPONSE: Customers who call the company reach Verizon employees at the Customer Sales and Service Center, who are not dedicated to handling customer complaints in general or about the Lifeline program in particular. E-mails concerning the Florida Lifeline program issues are routed to one Verizon employee, who also handles other responsibilities.

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

RESPONSE: Verizon is not aware of any such instances relating to complaints about the Lifeline program.

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: Verizon does not subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system.

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?

RESPONSE: Verizon is not aware of any complaints relating to the Lifeline program that have reached 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: Verizon is not aware of any complaints relating to the Lifeline program that have been escalated beyond the Informal Conference stage in 2010 and 2011.

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

RESPONSE: Verizon does not track this information in the normal course of its business, but to its knowledge most if not all complaints concerning the Lifeline program are resolved within 30 days.

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?

RESPONSE: The rule has had a neutral effect on the way Verizon processes complaints relating to the Lifeline program.

- b. How has the rule affected the Company's cost of handling complaints?

RESPONSE: The rule has had a relatively small effect on Verizon's costs of handling complaints relating to the Lifeline program.

Respectfully submitted on March 14, 2012.

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