

REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a AT&T FLORIDA

Lynn Haven, Panama City, Panama City Beach, Sunny Hills, and Vernon Exchanges *June 16 – July 23, 2008*

Division of Service, Safety & Consumer Assistance

July 28, 2009

BellSouth Telecommunications, Inc., d/b/a AT&T Florida Telecommunications Service Quality Report

Summary

Staff performed a service evaluation on BellSouth Telecommunications, Inc., d/b/a AT&T Florida (AT&T), during the period of June 16 – July 23, 2008. The exchanges reviewed were Lynn Haven, Panama City, Panama City Beach, Sunny Hills, and Vernon. The categories staff evaluated were as follows:

- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes a Directory Review and New Numbers in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops, Transmission
- Repair Service, which includes Out-of-Service (OOS) Restored within 24 Hours,
 Service Affecting (SA) Restored within 72 Hours, and Rebates Required by Rule
- Periodic Report Review
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions
- Service Guarantee Program (SGP) Rebates, which includes Installation SGP Rebates and Out-Of-Service SGP Rebates
- SGP Answer Time
- SGP Report Review

The service evaluation objectives are (1) to evaluate a company's performance based on service quality rules and standards; (2) to verify the service results the company reported to the Commission on a periodic basis; (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations; and (4) to determine if the company is adhering to its service guarantee program approved by the Commission.

AT&T met the rule requirements in the following categories:

- Answer Time
- Availability of Service (Installation)
- Repair Service Service Affecting (SA) Restored within 72 Hours
- Safety Ground Deficiencies
- Timing and Billing Accuracy for Intra-LATA 1+, and Directory Assistance Billing
- 9-1-1 Emergency Voice and TDD call completions
- SGP Answer Time

Findings

In the periodic report review, staff examined the period from April 2007 through March 2008 for the exchanges being evaluated and found that the reports required by rule were in agreement with the records that were examined except for two instances. In the Availability of Service, for the fourth quarter of 2007 and the first quarter of 2008, the company's periodic report stated that all the exchanges reviewed failed to meet the standard, which is 90% of the orders installed within three days. The evaluation indicated the company met standards for all the exchanges reviewed. The evaluation percentages are in the ninety percentile while the periodic report stated the percentages were within the thirty, forty, and fifty percentiles. The Repair Service – OOS restored within 24 hours evaluation results in the Panama City exchange for the first quarter of 2008 did not agree with AT&T's periodic report. AT&T indicated only 67.3% of the OOS trouble tickets were cleared within 24 hours. The evaluation determined the percentage to be 80.5%.

In the SGP report review, AT&T reported Installation SGP rebates were provided in several months. Staff examined the months that indicated SGP rebates were provided and could not find any missed installation that required an SGP rebate. AT&T has stated previously that there is a disconnect between the billing system and provisioning/repair system. The incident, a missed installation or repair interval, is reported in one system and the customer will not be credited until the next billing cycle. The incident and the bill credit will not usually occur in the same month.

Staff found deficiencies in several other categories listed below.

Adequacy of Directory Services:

Directory Review:

Staff reviewed two of AT&T's telephone directories; one labeled "Chipley" dated September 2008 and the other one labeled "Panama City" dated April 2008. The amount for Directory Assistance (DA) was listed in the directories as \$1.25 for local DA with two free requests. This amount did not match the prices listed in the company's tariff. The tariff states the DA price is \$0.45 for local DA requests and does not mention any allowances or free requests. The effective date for the tariff is October 24, 2003.

Corrective Action:

AT&T stated that the directory assistance charge was increased to \$1.25 effective August 4, 2006 and later increased to \$1.35 effective August 4, 2007. The rate increased again to \$1.50 effective July 15, 2008. The amount listed in the directory is dependent on the issuance date of the directories. If the directory was issued prior to the effective date of the rate increase, then the older rate should be published. If the directory was issued after the effective date of the rate increase, then the newer rate should be published. AT&T has taken steps to insure future directories reflect the tariffed rates in effect when the directories are published.

New Numbers in Directory Assistance:

Out of the 161 requests for numbers to DA, the DA operators found 159 of the numbers correctly. Some of the problems were that the DA operators would state that a number was not published when the number should have been published or the number was not found at all, even when a street address was given to the operator.

Corrective Action:

AT&T stated the DA requests that were missed were attributed to the fact that the customers had many move orders and DA was not updated properly. Staff found that the move orders were issued after the date that staff tested for DA.

Subscriber Loops:

Transmission:

For the exchanges that were reviewed, 499 loops were tested for transmission requirements. Forty-five loops were deemed unsatisfactory. The problems observed were high power influence, high noise, and low balance readings. The readings caused the loops to be classified as unsatisfactory.

Corrective Action:

AT&T sent technicians out to retest the lines that were deemed unsatisfactory by staff. AT&T found the issues appeared to be related to the sandy soil and the inability to get a good ground in the sandy terrain. AT&T provided a summary for each exchange that had unsatisfactory loops. In Vernon, AT&T could not find a pattern that would warrant further action. In Sunny Hills, four of the loops were repaired by rebuilding a wet splice. In Panama City Beach, nine loops were isolated to a cross box that was damaged by a fallen tree and the cross box is under review to be replaced. In Panama City, AT&T could not find a pattern that warrants additional action. In Lynn Haven, AT&T could not find a pattern that warrants further action.

Repair Service:

Out-of-Service Reports restored within 24 Hours:

Staff reviewed the fourth quarter of 2007 and the first quarter of 2008 for the Lynn Haven, Panama City, Panama City Beach, Sunny Hills, and Vernon exchanges. For the fourth quarter of 2007, only the Panama City Beach exchange complied with the standards. In the first quarter of 2008, all the exchanges failed to meet the standards.

Corrective Action:

AT&T responded to the draft report stating that its dispatch strategy is designed to meet customer's expectations, to increase efficiencies, and to increase customer satisfaction. AT&T operates under a Service Guarantee Program (SGP) and provides rebates directly to its customers when it fails to meet the objectives of the SGP

Rebates Required by Rule:

During the repair ticket review, staff found 729 rebates were due to customers being out of service greater than 24 hours. Thirty-nine rebates were not credited to the customers. In most instances, the repair tickets were determined to be incorrectly coded. The tickets were initially coded as service affecting; however, upon review it was determined the customer experienced an out-of-service condition and should have been credited with a rebate.

Corrective Action:

In its response to the draft report, AT&T stated that it statuses a customer's service as Out-of-Service (OOS) based on the customer's report, line test results, and what a technician determines to be the cause of the trouble in the field. When staff reviews the trouble tickets, staff considers the ticket as OOS, according the rules, as "[t]he inability, as reported by the customer, to complete either incoming or outcoming calls over the subscriber's line." AT&T found fifteen rebates that were initially marked as service affecting. After further investigation, AT&T determined that they were coded incorrectly and should have been coded as OOS. AT&T has provided the appropriate credits to the accounts.

AT&T stated that the remaining twenty-four lines where no credits were provided represent situations where AT&T and staff differ on whether or not the customer was OOS based on the Commission rule. It is AT&T's policy to base a determination of an OOS condition on whether or not the customer's line is actually capable of handling incoming or outgoing calls. AT&T stated that when a customer calls in a trouble report a series of automated tests are performed on the customer's line to determine if the customer's line is OOS. If the result of these tests indicate that the trouble is not on the line, the trouble report is marked service affecting and is handled appropriately. In spite of AT&T's disagreement with the staff's interpretation of the rule, AT&T will provide the credit for each of those instances.

Service Guarantee Program (SGP) Rebates:

Installation SGP Rebates:

In reviewing the service orders, staff found 12 instances where an SGP Installation credit was due to customers. AT&T only provided 8 of the automatic credits to its customers. In the instances where AT&T failed to provide an automatic credit, the company recorded the reason that the order was not completed on time as "Company Facilities". When staff queried AT&T as to why an installation SGP rebate was not being provided, AT&T stated that the new installation

could not be completed because the assigned cable pairs were defective and no spare cable pairs were available. The delay was caused by the additional time to repair the faulty cable pairs. Staff disagreed that coding the service order to "Company Facilities" did not entitle the customer to an installation SGP rebate. The customer should not be penalized because of faulty cable pairs that are not repaired in an expeditious manner.

Corrective Action:

AT&T provides automatic Service Guarantee credits for missed commitments for the installation of primary and additional residential line service. Staff found four instances where AT&T did not provide the SGP credit for missed installation commitments. The service orders were coded as "Company Facilities". AT&T explained no company facilities were available because the assigned cable pairs were defective and no spare cable pairs were available. Staff disagreed that coding the service orders to "Company Facilities" did not entitle the customer to an installation SGP credit. Further review found that the four customers were entitled to receive the SGP credit and AT&T will provide the appropriate installation credit to these customers.

Out-Of-Service SGP Rebates:

In reviewing the repair tickets, staff found 729 instances where an SGP Out-of-Service credit was due to customers. AT&T provided 683 of those automatic credits to its customers. As mentioned in the Rebate Required by Rule section, there were tickets marked as service affecting that were re-classified to an out-of-service condition. There were instances where AT&T did provide a regular rebate, but not an SGP rebate.

Corrective Action:

AT&T's investigation revealed that of the original eighty-eight lines where no credits were provided, forty-three were additional lines and no SGP credit was required but AT&T does provide a regular rebate. Seventeen lines were initially marked as service affecting, however, after further review, it was determined that they were coded incorrectly and should have been marked as OOS. The appropriate credit have been provided to these accounts. Five of the accounts have been disconnected and AT&T is unable to determine if an SGP credit was required. One credit was provided in the original documentation to staff.

AT&T stated in its response to the draft report, the remaining twenty-four lines where no credits were provided represent situations where AT&T and staff differ on whether or not the customer was OOS. In spite of AT&T's disagreement with the staff's interpretation for the rule, AT&T will provide the SGP credit for each of these accounts.

Immediately following the summary and findings is a series of charts depicting the results of the categories that were evaluated. In the instances where AT&T failed to meet the established standard, the results are highlighted in yellow.

BellSouth Telecommunications, Inc., d/b/a AT&T Florida Telecommunications Service Quality Report

Charts

Answer Time - Business Office*								
% of Calls %								
	Total	Calls	Calls	Calls	Answered in	Answered		
	Calls	Failed	Offered	Answered	55 sec.	w/i Std.		
Voice	150	0	100.0%	149	148	99.3%		
TDD	52	1	98.1%	45	42	93.3%		

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 24-4.073 (b) and (c) F.A.C., Answering Time applies.

^{*} One busy signal after the IVRU for the Business Office Voice calls. Six busy signals to the Business Office TDD, operators were having problems with TDD machines.

Answer Time - Repair Service*								
			% of		Calls	%		
	Total	Calls	Calls	Calls	Answered in	Answered		
	Calls	Failed	Offered	Answered	55 sec.	w/i Std.		
Voice	150	0	100.0%	150	147	98.0%		
TDD	N/A	N/A	N/A	N/A	N/A	N/A		

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 25-4.073 (b) and (c) F.A.C., Answering Time applies.

DID NOT MEET STANDARD

^{*} The same TDD number was used for both Business Office and Repair Center.

Directory Reviewed						
	Total Items	Items in Compliance	% of Items in Compliance			
Name / Date of Directory	Reviewed	with Std.	with Std.			
Chipley September 2008	21	20	95.2%			
Panama City April 2008	21	21	100.0%			
"Directory Listing" annual bill insert	1	1	100.0%			
"No Sales" annual bill insert	1	1	100.0%			
Total	44	43	97.7%			

Standard: 100% of the items reviewed for the directory shall comply with Rule 25-4.040 F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons.

New Numbers in Directory Assistance					
Requests Total					
	for	found in	% Found		
Calls Made to DA	Numbers	DA	in DA		
161	161	159	98.8%		

Standard: 99% of new service orders shall be listed in Directory Assistance (DA) within 48 hours of competition of the order. Rule 25-4.040 (5) F.A.C., Telephone Directories; Directory Assistance applies.

Availability of Service (Installation) - 4th Qtr 07							
			Orders				
	Total		Delayed		Orders	% Orders	
	Orders	Orders	for	Net	Completed	Completed	
Exchange	Reviewed	Excluded	Const.	Orders	w/i Std.	w/i Std.	
Lynn Haven	177	0	0	177	176	99.4%	
Sunny Hills	66	0	0	66	61	92.4%	
Vernon	55	0	0	55	53	96.4%	

Availability of Service (Installation) - 1st Qtr 08								
			Orders					
	Total		Delayed		Orders	% Orders		
	Orders	Orders	for	Net	Completed	Completed		
Exchange	Reviewed	Excluded	Const.	Orders	w/i Std.	w/i Std.		
Lynn Haven	203	0	0	203	196	96.6%		
Panama City	870	0	0	870	839	96.4%		
Panama City Beach	751	0	0	751	723	96.3%		
Sunny Hills	80	0	0	80	78	97.5%		
Vernon	65	0	0	65	63	96.9%		

Standard: 90% of Services Orders shall be completed within 3 days, on the appointment day, or on the customer request if greater than 3 days. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.066 F.A.C., Availability of Service applies.

Subscriber Loops - Transmission							
	Total Loops	Number of Unsatisfactory	Number of Satisfactory	% of Satisfactory			
Exchange	Tested	Loops	Loops	Loops			
Lynn Haven	100	12	88	88.0%			
Panama City	99	11	88	88.9%			
Panama City Beach	100	12	88	88.0%			
Sunny Hills	100	6	94	94.0%			
Vernon	100	4	96	96.0%			
Company Total	499	45	454	91.0%			

Standard: Rule 25-4.072 F.A.C., Transmission Requirements applies. An unsatisfactory loop describes a condition where the parameter (loss, noise, balance, loop current) being measured is not within the recommended or acceptable limits as defined within the ANSI/IEEE std. 820-1984.

Out-of-Service Reports Restored Within 24 Hours - 4th Qtr 2007						
				# of OOS Reports	% of OOS Reports	
	Reports	Excluded	# of OOS	Cleared w/i	Cleared w/i	
Exchange	Reviewed	Reports	Reports	24 Hrs.	Std.	
Lynn Haven	330	5	186	171	91.9%	
Panama City	1452	92	1015	963	94.9%	
Panama City Beach	606	21	359	342	95.3%	
Sunny Hills	186	5	123	109	88.6%	
Vernon	189	15	119	94	79.0%	

Out-of-Service Reports Restored Within 24 Hours - 1st Qtr 2008							
				# of OOS Reports	% of OOS Reports		
	Reports	Excluded	# of OOS	Cleared w/i	Cleared w/i		
Exchange	Reviewed	Reports	Reports	24 Hrs.	Std.		
Lynn Haven	354	11	211	167	79.1%		
Panama City	1325	104	850	688	80.9%		
Panama City Beach	736	15	489	413	84.5%		
Sunny Hills	149	3	88	76	86.4%		
Vernon	189	15	120	98	81.7%		

Standards: 95% of Out-of-Service Repair Tickets shall be cleared within 24 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Service Affecting Reports Restored Within 72 Hours - 4th Qtr 2007					
	# of SA	# of SA Reports	% of SA Reports		
Exchange	Reports	Cleared w/i 72 Hrs.	Cleared w/i Std.		
Lynn Haven	139	138	99.3%		
Panama City	345	345	100.0%		
Panama City Beach	226	226	100.0%		
Sunny Hills	58	58	100.0%		
Vernon	55	55	100.0%		

Service Affecting Reports Restored Within 72 Hours - 1st Qtr 2008						
	# of SA	# of SA Reports	% of SA Reports			
Exchange	Reports	Cleared w/i 72 Hrs.	Cleared w/i Std.			
Lynn Haven	132	132	100.0%			
Panama City	371	370	99.7%			
Panama City Beach	232	232	100.0%			
Sunny Hills	58	58	100.0%			
Vernon	54	54	100.0%			

Standards: 95% of Service Affecting Repair Tickets shall be cleared within 72 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Repair Service Rebates Required by Rule						
Month	Rebates Due	Rebates Given	% of Rebates Given			
October-2007	123	112	91.1%			
November-2007	54	54	100.0%			
December-2007	87	82	94.3%			
January-2008	105	98	93.3%			
February-2008	261	253	96.9%			
March-2008	99	91	91.9%			

Standard: 100% of the rebate shall be automatically credited to the customer if the service remains out-of-service in excess of 24 hours computed on a continuous basis, Sundays and holidays included. Rule 25-4.070 (1)(b), F.A.C. Customer Trouble Reports applies.

Safety - Ground Deficiencies										
Exchange	Loops Tested	Poor Grounds	% of Adequate Grounds							
N										
Lynn Haven	23	0	100.0%							
Panama City	21	0	100.0%							
Panama City Beach	22	0	100.0%							
Sunny Hills	20	0	100.0%							
Vernon	14	0	100.0%							
Company Total	100	0	100.0%							
Rai	ndom Loops	S								
Lynn Haven	77	1	98.7%							
Panama City	74	4	94.6%							
Panama City Beach	75	0	100.0%							
Sunny Hills	79	3	96.2%							
Vernon	84	5	94.0%							
Company Total	389	13	96.7%							

Standard: Rule 25-4.038, F.A.C. Safety applies.

Timing and Billing - Intra-LATA										
	Number of	Calls	Calls	% Correctly						
	Calls	Undertimed	Overtimed	Timed						
Timing Accuracy										
1+	150	1	0	99.33%						
		•	•	•						
Billing Accuracy										
1+	150	1	0	99.33%						
Billing Per Tariff				Yes or No						
1+		_		Yes						

Standard: Timing and billing accuracy for intra-LATA calls shall not be les than 97%. Rule 25-4.077 Metering and Recording Equipment applies.

	Timing and Billing - Directory Assistance										
							%	Billed			
Central	Telephone	Calls		Billable	Calls		Correctly	per			
Office Number Made		Made	Allowance	Calls	Billed	Variance	Billed	Tariff			
Panama	850-522-										
City	1043	128	0	128	129	-1	99.2%	Y			
Panama											
City -	850-747-										
TDD Line	8062	65	65	0	0	0	100.0%	Y			

Standard: 97% of calls to DA shall be billed correctly and in accordance with the company's tariff on file with the Commission. Rule 25-4.077 Metering and Recording Equipment, and Rule 25-4.115, F.A.C., Directory Assistance applies.

9-1-1 Emergency Service										
		Failed	Calls	% of Calls						
Area	NXX	Made								
Voice Calls										
Panama City	150	100.0%								
TDD Calls*										
Panama City 522 47 0 0 47 100.0%										

Standard: 100% of calls to 911 Emergency Service shall be completed by the company. Rule 25-4.081, F.A.C. Emergency 911 Access applies.

^{*} Three calls received a fast busy signal for the 9-1-1 TDD

Installation SGP Rebates										
	Total									
	Rebates	Rebates	% of Rebates							
Month	Due	Given	Given							
October-2007	1	1	100.0%							
November-2007	0	0	None Found							
December-2007	0	0	None Found							
January-2008	3	2	66.7%							
February-2008	3	2	66.7%							
March-2008	5	3	60.0%							

Standard: Service Guarantee Plan states the company shall make an automatic credit to the customer for failure to install service on the agreed upon commitment date. Docket No. 050095-TL and Order No. PSC-05-0440-PAA-TL, issued April 25, 2005, applies.

Out-of-Service SGP Rebates										
	Total									
	Rebates Rebates		% of Rebates							
Month	Due	Given	Given							
October-2007	123	112	91.1%							
November-2007	54	53	98.1%							
December-2007	87	80	92.0%							
January-2008	105	97	92.4%							
February-2008	261	251	96.2%							
March-2008	99	90	90.9%							

Standard: Service Guarantee Plan states the company shall make an automatic credit to the customer for out-of-service condition greater than 24 hours. Docket No. 050095-TL and Order No. PSC-05-0440-PAA-TL, issued April 25, 2005, applies.

Quality of Service Complaints Reported to the Commission												
	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08
Number of Customer Complaints	97	141	144	173	154	126	150	96	110	124	125	106

