

Talbott *MB* / *WDT*
Vandiver *OUT*

FLORIDA PUBLIC SERVICE COMMISSION
Capital Circle Office Center • 2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

M E M O R A N D U M

May 9, 1996

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF COMMUNICATIONS (K. LEWIS) *kor*
DIVISION OF LEGAL SERVICES (PIERSON) *RP* *JP*

RE: DOCKET NO. 960358-TC - PEOPLES TELEPHONE COMPANY, INC. -
INITIATION OF SHOW CAUSE PROCEEDINGS FOR VIOLATION OF
RULE 25-24.515(8), F.A.C., PAY TELEPHONE SERVICE
REQUIREMENTS.

AGENDA: 05/21/96 - REGULAR AGENDA - INTERESTED PERSONS MAY
PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: S:\PSC\CMU\WP\960358B.RCM

CASE BACKGROUND

Peoples Telephone Company, Inc. (PTC) has been certified to provide pay telephone service in Florida since March 14, 1985. According to the company's 1995 annual report, it operates 8,658 pay telephones in Florida and earned intrastate revenues of \$7,634,749.

On April 4, 1996, staff filed a recommendation that PTC be ordered to show cause why it should not be fined for apparent violations of Rules 25-24.515(8), Pay Telephone Service Standards and Rule 25-4.043, Response to Commission Staff Inquiries, Florida Administrative Code. The recommendation addressed staff's concerns regarding the blocking of incoming calls at pay telephones for which an exemption had not been granted as well as the company's failure to timely respond to staff's request for information. The item was deferred from the April 16, 1996 agenda conference at the request of PTC. Staff rescheduled the item for the next available agenda. However, on April 26, 1996, PTC submitted a proposal to settle the matter in lieu of initiating show cause proceedings (Attachment A). In order to have sufficient time to review the

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settlement proposal and make a recommendation, staff requested that the item be deferred from the April 30, 1996 agenda conference. On May 7, 1996, at staff's suggestion, PTC filed a supplement to its proposal to clarify the procedures it intends to implement in response to staff's concerns (Attachment B). The following is staff's recommendation with regard to the settlement proposal.

ISSUE 1: Should the Commission accept the proposals filed by Peoples Telephone Company, Inc. to resolve the apparent violations of Rule 25-24.515, (8), Florida Administrative Code, Pay Telephone Service Standards and Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries?

RECOMMENDATION: Yes, the Commission should accept the proposals filed by Peoples Telephone Company, Inc. to resolve the apparent violations of Rule 25-24.515, (8), Florida Administrative Code, Pay Telephone Service Standards and Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries.

STAFF ANALYSIS: PTC has acknowledged "...inadvertent incoming call blocking at a number of our Florida stations..." This blocking was in violation of Rule 25-24.515, Florida Administrative Code, which states in pertinent part: "Each telephone station shall allow incoming calls to be received, with the exception of those located at confinement facilities, hospitals and schools, and at locations specifically exempted by the Commission."

PTC has applied for and received exemption status at 57 of its pay telephones. However, in the past year, staff's routine pay telephone evaluations found incoming calls could not be received at 55 locations for which no exemption had been granted. In addition, both the Seminole County and the Volusia County 911 Centers have notified staff of pay telephones in their respective areas that could not receive incoming calls. While the inability to receive incoming calls can cause inconvenience to the general public, it can have more serious consequences for County 911 Centers. Emergency workers often must return a call to a payphone after receiving a call at the 911 center. Being able to call back allows the 911 center to identify the type of emergency, if it was not adequately identified in the original call, and direct an appropriate emergency response team, if required.

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It should be clarified that when the staff engineer evaluates a pay telephone, he marks a violation on his check sheet if an incoming call cannot be received for any reason. He usually tests for incoming call capability by asking the local operator to call him back at the number posted on the pay telephone. If the pay telephone has been programmed to reject or "block" incoming calls, the operator's call will not go through. The staff engineer will mark this as a violation. Another circumstance that might cause incoming calls not to be received is faulty equipment within the payphone. For example, if the ringer mechanism is faulty, the payphone will not ring when the operator calls back. In those cases, the staff engineer would also mark a violation due to the inability to receive an incoming call because the telephone did not ring.

Staff's routine service evaluations over the past year had identified 54 pay telephones that were not able to receive incoming calls. As is our normal procedure, Communications staff sent letters to PTC identifying these apparent violations as they were found. PTC responded to each of the letters. Summarizing all the responses shows:

WHAT PTC FOUND WHEN IT INSPECTED PAYPHONES IDENTIFIED BY STAFF/1995

31 were working properly (per technician)
21 required keypad/ringer replacements
2 required programming downloads
54

WHAT PTC FOUND UPON REINSPECTION AFTER STAFF'S 4/4/96 REC WAS FILED

40 were working properly (per technician)
13 required a keypad/ringer replacement
1 had been disconnected
54

According to People's letter dated April 25, 1996, its reinspection revealed that the inadvertent blocking or inability to receive incoming calls was caused by inadequate maintenance and repair or wear-and-tear factors and for no other reason.

PTC has also acknowledged its failure to respond to Commission staff in a timely manner regarding the complaints filed by the Seminole County 911 Office as required by Rule 25-4.043, Response to Commission Staff Inquiries, Florida Administrative Code. The procedures PTC has implemented to improve its response time are also addressed in its settlement proposal. The settlement proposal was filed in two parts, a letter dated April 25, 1996 (Attachment A), and a letter dated May 7, 1996 (Attachment B). Staff has summarized both letters below.

The Proposal

1. PTC acknowledges that despite its internal policy that incoming calls are to be allowed at all its Florida pay stations unless an exemption has been obtained, incoming calls were inadvertently blocked or otherwise could not be received at a number of its Florida pay stations.
2. PTC believes it made the necessary corrections to its payphones as staff reported specific problems but acknowledges a delay in providing each of the required written responses within fifteen days. Recognizing the importance of providing a timely response to the Commission staff, PTC will rehire additional full time support staff in its Regulatory Department to ensure that responses are provided in a timely manner.
3. PTC will pay a \$5,000 penalty to reflect the field problems it has experienced and the time lag in responding to staff's inquiries.
4. On April 19, 1996, PTC began a state-wide rate table download to ensure that all its payphones (approximately 8,000) were programmed to allow incoming calls. PTC then re-programmed only those payphones which had been granted an exemption from the incoming call requirement.
5. On April 19, 1996, PTC began conducting a systematic on site inspection program to verify that each of its Florida payphones is properly processing incoming calls from both a programming and hardware standpoint. Each of these inspections includes a live callback from another technician either in the field or from a technical support office. The expected completion date is May 15, 1996.
6. All keypad/ringer assemblies worked on by PTC in-house refurbishment/repair operations will be tested to assure that the ringer is fully functional before being placed back in service.
7. The "final check list" used by PTC technicians at the time of all new installations will be amended to include a "call receipt" test for ringer functionality and incoming call capability.

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8. PTC will conduct periodic incoming call verification tests during regularly scheduled maintenance/collection visits.
9. Equipment suppliers will be contacted to determine whether modifications to the keypad/ringer equipment may offer better reliability and performance in the field.

Staff is satisfied that the above procedures should correct the problems that PTC has had with incoming call capabilities. We believe payment of \$5,000 is a reasonable penalty based upon the fines and/or settlements that have been paid by other pay telephone providers for similar service violations.

ISSUE 2: Should this docket be closed?

RECOMMENDATION: Yes, with the adoption of staff's recommendation in Issue 1, this docket should be closed.

STAFF ANALYSIS: If the Commission adopts staff's recommendation in Issue 1, this docket may be closed.

PTC

Peoples Telephone Company, Inc.

April 25, 1996



VIA FACSIMILE AND FEDERAL EXPRESS

Ms. Kathy Dyal-Lewis
Bureau of Service Evaluation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960358-TC

Dear Kathy:

As discussed, this letter constitutes (1) a response to the recent Staff Recommendation in the above referenced Docket, to initiate a show cause proceeding against Peoples Telephone Company, Inc. ("Peoples" or the "Company") for incoming call blocking problems at certain of our Florida pay telephones, and (2) a proposal to settle this matter in lieu of initiating show cause proceedings. We greatly appreciate the opportunity to present you with this material and sincerely hope that this issue can be resolved amicably and expeditiously, without the need to further divert valuable Staff time and resources or the limited resources of our Company.

First and foremost, we want to stress the fact that Peoples devotes significant effort and attention toward, and strives daily to comply on an ongoing basis with, all Florida Public Service Commission ("FPSC" or the "Commission") and other state and federal regulatory requirements for operating our national pay telephone base of over 38,000 stations in 41 states. While there certainly appears to have been a problem with respect to inadvertent incoming call blocking at a number of our Florida stations in this instance, we ask that this problem be viewed within the context of our overall performance as a reliable company that complies well on a day-to-day basis with the many regulatory requirements applicable to a multi-state pay telephone operation.

As the largest U.S. independent pay telephone provider ("IPP") and a publicly traded company, we take our regulatory compliance responsibilities very seriously. We also believe that Peoples is demonstrably well regarded by the regulatory personnel that inspect our pay stations across the country, as being a quality operator of pay telephones especially when compared to all other providers in the industry. The feedback we have received from the Commission's pay telephone inspectors has to our best knowledge echoed this quality evaluation in recent times, and we are therefore most concerned over the Show Cause Recommendation. Beyond just being concerned, we seek here to effectively remedy any remaining service problem or other issue Staff may have with our performance, and to move ahead cooperatively.

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With regard to the specific "incoming call blocking" problems cited in the Staff's Recommendation, we are most concerned if even one of our pay telephones in the State of Florida is not allowing incoming calls to be received, absent a "waiver" from the Commission. Let me state clearly for the record that it is Peoples' policy and operational procedure, plain and simple, that incoming calls are to be allowed on all of our Florida pay stations, unless we have a waiver for a specific location authorized by the Commission.

Attached in this regard are our internal memoranda, distributed to our headquarters and field personnel over the past three years as to incoming call blocking requirements for the states in which we operate. As can be seen for Florida, incoming calls are to be allowed throughout the State, absent a FPSC waiver. Pursuant to this policy, Peoples has rigorously controlled incoming call blocking requests coming from the field, by requiring all of these to be in writing/with an explanation and to be strictly routed through our Regulatory Department for processing and approval/denial. For those Florida incoming call block requests that are accompanied by the approval of the location owner and the appropriate law enforcement official, we process a FPSC waiver request. Once approval is granted by the Commission, we order central office based incoming call blocking from the LEC. Based on our records, Peoples has obtained approval for 66 such waiver requests, and we have several more waiver requests currently in the pipeline.

To the extent there have been pay telephones in Florida outside of this authorized group not allowing incoming calls, this has occurred, based upon all that we can surmise, as a result of field maintenance/repair/wear-and-tear factors--and for no other reason. We rely on several facts in making this assessment. First, the problem that is most often involved with a "no incoming call" status is a "ringer" problem, not a call blocking programming problem. The ringer is associated with the "keypad" assembly in our instruments which presents an ongoing repair and maintenance "challenge" based upon the standard use and abuse to which the keypad is subject on a public pay telephone. We stock approximately 15% of our nationwide installed base for these parts in inventory at any one time, which is 50-100% more than the number stocked for most other parts, reflecting the high repair/replacement incidence for the ringer/keypad assemblies on our payphones. In a nutshell, keypads and ringer assemblies go bad and have to be replaced regularly at a high rate, as part of operating an instrument implemented pay telephone "on the street". Second, based upon review of our entire regulatory service evaluation/consumer affairs complaints nationwide, complaints over not being able to receive an incoming call at one of our pay telephones impacted slightly less than three tenths of one percent of our national installed payphone base. While this percentage is slightly higher in Florida, it is still less than one percent. Third, in Florida so far this year (as of 4/17/96), Peoples

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has undergone 125 pay telephone service evaluations of which only one showed an incoming call blocking problem--indicating that the problem is not pervasive or ongoing.

Although, in retrospect, over 50 instances of incoming call non-completion service evaluations for calendar year 1995 in Florida appears to be a large number, these instances covered a twelve month timeframe for an installed base of over 8,000 phones in the State. As such, and we certainly may have missed the boat on this, the magnitude for this one service evaluation category did not "jump out" to Peoples as a pervasive problem area requiring any special treatment beyond our normal corrective actions.

Please be assured that when a service evaluation reveals an operational problem, it is in the Company's interest and we always proceed to do our best to fix the problem. We have a state of the art service trouble/repair system, into which all service evaluation deficiencies (including incoming call blocking) are entered as "troubles" on the relevant payphone(s), and from which we get generally excellent results in keeping our payphones working properly--the lifeblood of our business. Once the problem is entered as a trouble in our repair system, our technician will visit the paystation to investigate the problem and make the necessary repairs/replacements. This service correction and trouble code disposition is then entered by the field tech into our database to reflect that the trouble has been cleared. Once the trouble is cleared, the Company's Regulatory Department informs the Commission Staff that the service evaluation deficiency has been corrected.

In the rare case where a problem reoccurs upon a second service evaluation visit to the pay station, this is due to the problem reoccurring, not to the problem not having been attempted to be fixed the first time out. Given the time interval between conduct of the first and second tests, and the nature of the payphone parts involved here (keypad/ringer assembly), it is not unheard of that a "no incoming call" situation generated by a ringer problem could reoccur during the month or more between inspections.

With respect to the specific 54 pay telephones cited in Staff's recommendation as having experienced incoming call block problems, pursuant to the 1995 field service evaluations, Peoples' original findings as reported to Staff indicated that 31 phones were found to be operating properly, 21 stations were repaired with new keypad/ringer replacements and 2 phones required programming downloads. Current revisitation of these pay stations by our field technicians has revealed that incoming call service was functioning properly in 40 stations, with 13 again requiring the replacement of the keypad/ringer assembly (one phone is disconnected).

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Concerning Peoples internal procedures regarding incoming call blocking at our phones, the following provides additional detail and specific information on how we have approached this issue at a corporate level:

◆ Once a written request for incoming call blocking is received, Peoples' Regulatory Department is responsible for (1) acquiring regulatory approval where applicable, (2) coordinating the rate table programming modification, (3) posting of notice on the affected pay telephone, (4) notifying our Telco Billing Department to order LEC CO-based incoming call blocking, and (5) recording the change in service condition in Peoples' computer database. This process applies to all pay telephones operated by Peoples, in all states.

◆ Over the years, Peoples has acquired regulatory approval, where necessary, to block incoming calls at its pay telephones in various states. In addition to the Florida waivers mentioned above, Peoples has also sought and received approval in other states which require a waiver of the relevant rules, including: Georgia, South Carolina, Virginia and the District of Columbia, to name only a few.

◆ Peoples' Regulatory Department has developed a matrix (Attachment "B", 3 pages) for Peoples' Customer Support personnel which lists each state, whether blocking is allowable and the state's waiver requirements, if applicable. This matrix (originally created in 1992) was developed to help our Customer Support personnel respond quickly to inquiries from law enforcement agencies and Peoples' location owners requesting that incoming calls be blocked.

◆ In conjunction with the Company's refurbishment program, started in late 1994, Peoples rebuilds its damaged keypads in-house and performs a full quality assurance test on each keypad and ringer assembly prior to returning the keypad to the field.

Also attached, is a Project Review summary which details the specific actions taken by Peoples since this matter has come to our attention via Staff's Recommendation and provides a service schedule of field activities currently underway to evaluate all of Peoples pay telephones in Florida to ensure appropriate incoming call functionality. As can be seen by this attachment, and notwithstanding Peoples' strong belief that the incoming call blocking problems are not widespread or ongoing, we have undertaken a fairly arduous process to verify that all of our Florida phones are double checked from both a programming and hardware perspective to ensure that incoming calls are being properly processed in the State.

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In light of the information provided in this correspondence, it should be clear that Peoples strives to comply with regulatory requirements and offer quality services to users of our pay telephones. Further evidence of this is also shown historically by Peoples' expending significant resources to ensure that our Florida pay telephones are in compliance with ADA and handicapped accessibility requirements; ongoing contacts with Staff when Peoples learned of situations or problems which negatively impacted Florida pay telephone operations; implementation of AT&T as our national operator services provider, with a "self imposed" interstate rate cap that accompanies this carrier selection; and, Company participation, both individually and through the industry's state and national trade associations, in forums to educate, update, change, and/or implement a fair and reasonable operating environment for public communications that serves consumers well.

In view of all these factors, Peoples would request that the Staff consider and recommend, as a settlement of this matter, acceptance of (1) Peoples commitment at significant time and expense to verify incoming call completion "live" at each of our Florida pay stations, and (2) a payment by Peoples of a \$5,000 assessment, to reflect the field problems we experienced and the time lag in responding to several of the service complaints, as cited in Staff's Recommendation. We believe that our proposal is a fair settlement, in view of the inadvertent, service oriented violations involved, and the overall performance of the Company on running good, reliable and highly compliant pay telephone routes with over 8,000 payphones in our home State of Florida. Although Peoples truly does not feel that a monetary penalty is warranted under the circumstances, the above proposal is offered in the spirit of an amicable resolution.

Kathy, thank you for your consideration of this material and our proposed settlement in lieu of Show Cause proceedings. Please contact me at your earliest convenience to discuss how best to proceed in resolving this matter. As we discussed, I will plan to be in attendance at Tuesday's Agenda Conference and will look forward to seeing you there.

Respectfully,



Bruce W. Renard
Executive V.P. and General Counsel

cc: Mr. Alan Taylor
Mr. Rick Moses

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Peoples Telephone Company
Project Review

1. On April 2, 1996, PTC Regional Manager re-visits 904-257-5705 located at 710 East International Speedway Boulevard in Daytona Beach, Florida. Reports that ringer bell, attached to the key pad, was not functioning properly and replaced key pad/ringer assembly. Then confirmed payphone received incoming calls and the ringer bell could be heard.

2. On April 3, 1996, PTC Regional Manager re-visits 407-322-8664 and 407-322-8997 located at 4730 W. State Road 46 in Sanford, Florida. Reports that each payphone received incoming calls and the ringer could be heard.

3. On April 18, 1996, PTC's Director of Regulatory Affairs sent memo to all Florida field offices requesting that 55 payphones originally inspected by Florida PSC Bureau of Service Evaluation staff during 1995 be re-visited to ensure incoming call acceptance at each payphone. On April 24, 1996, all offices provide written confirmation of incoming call acceptance at 54 payphones, reporting that 40 phones were found operating properly and 13 payphones required the replacement of the key pad/ringer assembly (8 of these 13 already had keypad/ringer replacements done in response to the initial service evaluation).

4. On April 19, 1996 PTC's Technical Support employees began state-wide rate table down loading to ensure that all Florida payphones (approximately 8,300) are programmed to allow incoming calls. However, approximately 60 payphones were re-programmed to limit incoming calls based on PSC waiver approval.

5. On April 19, 1996, all Florida technicians began evaluating multi-phone locations to ensure payphones are accepting incoming calls. To expedite the evaluation process, multi-phone locations were selected to begin the process because technicians can call into each phone using another phone at the same location. Expected completion date of May 15, 1996.

6. On April 24, 1996, PTC will begin evaluating single payphone sites to ensure payphones are accepting incoming calls. These evaluations are being coordinated with PTC's Miami Technical Support department so that calls can be made to the payphones during the technician's site visit, to verify incoming call functionality on a "live"/on-site basis. Expected completion date of May 15, 1996.

REGULATORY MEMORANDUM

TO Customer Support
 FR Steve Alexander, Director of Regulatory Affairs
 DT January 30, 1996

Listed below is an updated summary of the incoming call restrictions applicable in each state. In those states where blocking may be allowed, Peoples will require a written request from the location.

STATE	BLOCKING ALLOWED	COMMENTS
Alabama	NO	
Arizona	YES	Must post notice.
Arkansas	NRS	Must post notice.
California	YES	Must post notice.
Colorado	NRS	Must post notice.
Delaware	YES	Must post notice.
D.C.	YES	PSC waiver required.
Florida	YES	PSC waiver required.
Georgia	YES	PSC waiver required.
Idaho	YES	PSC waiver required.
Illinois	YES	Must post notice.
Indiana	YES	PSC waiver required.
Iowa	NRS	Must post notice.
Kansas	NRS	Must post notice.
Kentucky	YES	Must post notice.
Louisiana	NRS	Must post notice.
Maine	YES	Must post notice.
Maryland	YES	PSC waiver required.
Massachusetts	NRS	Must post notice.
Michigan	YES	Must post notice.
Minnesota	NRS	Must post notice.
Mississippi	NRS	Must post notice.
Missouri	YES	Must post notice.
Montana	YES	Must post notice.
Nebraska	NRS	Must post notice.
Nevada	NO	
New Hampshire	NO	
New Jersey	YES	Must post notice.
New Mexico	NO	
New York	NRS	Must post notice.
No. Carolina	YES	PSC waiver required.
No. Dakota	NRS	Must post notice.
Ohio	YES	Must post notice.
Oregon	YES	Must post notice.
Pennsylvania	YES	PSC waiver required.
Rhode Island	NRS	Must post notice.
So. Carolina	YES	PSC waiver required.
So. Dakota	NRS	Must post notice.
Tennessee	YES	PSC waiver required.
Texas	YES	Must post notice.
Utah	NRS	Must post notice.
Vermont	YES	PSC waiver required.
Virginia	YES	Must post notice.
Washington	YES	PSC waiver required.
West Virginia	YES	Must post notice.
Wisconsin	YES	Must post notice.
Wyoming	NO	

NRS = No Regulation Specified

REGULATORY MEMORANDUM

TO Pat Robustelli
 FR Steve Alexander
 DT December 20, 1994

Listed below is an updated summary of the incoming call restrictions applicable in each state. In those states where blocking may be allowed, Peoples will require a written request from the location.

<u>STATE</u>	<u>BLOCKING ALLOWED</u>	<u>COMMENTS</u>
Alabama	NO	
Arizona	YES	Must post notice.
Arkansas	NRS	Must post notice.
California	YES	Must post notice.
Colorado	NRS	Must post notice.
Deleware	YES	Must post notice.
D.C.	YES	PSC waiver required.
Florida	YES	PSC waiver required.
Georgia	YES	PSC waiver required.
Idaho	NO	
Illinois	YES	Must post notice.
Indiana	NO	
Iowa	NRS	Must post notice.
Kansas	NRS	Must post notice.
Kentucky	YES	Must post notice.
Louisiana	NRS	Must post notice.
Maine	YES	Must post notice.
Maryland	NO	PSC waiver required.
Massachusetts	NRS	Must post notice.
Michigan	NO	
Minnesota	NRS	Must post notice.
Mississippi	NRS	Must post notice.
Missouri	YES	Must post notice.
Montana	YES	Must post notice.
Nebraska	NRS	Must post notice.
Nevada	NO	
New Hamshire	NO	
New Jersey	YES	Must post notice.
New Mexico	NO	
New York	NRS	Must post notice.
No. Carolina	NO	
No. Dakota	NRS	Must post notice.
Ohio	YES	Must post notice.
Oregon	NRS	Must post notice.
Pennsylvania	NO	PSC waiver required.
Rhode Island	NRS	Must post notice.
So. Carolina	YES	PSC waiver required.
So. Dakota	NRS	Must post notice.
Tennessee	YES	PSC waiver required.
Texas	YES	Must post notice.
Utah	NRS	Must post notice.
Vermont	NRS	Must post notice.
Virginia	YES	Must post notice.
Washington	YES	PSC waiver required.
West Virginia	YES	Must post notice.
Wisconsin	YES	Must post notice.
Wyoming	NO	

REGULATORY MEMO

TO Bobby Benito
FR Steve Alexander
DT November 24, 1992

Listed below is a summary of the incoming call restrictions applicable in each state. In those states where blocking may be allowed, Peoples will require a written request from the location.

<u>STATE</u>	<u>BLOCKING ALLOWED</u>	<u>COMMENTS</u>
Alabama	NO	
Arizona	NRS	Must post notice.
California	YES	Must post notice.
Colorado	NRS	Must post notice.
Delaware	YES	Must post notice.
Florida	NO	
Georgia	NO	
Idaho	NO	
Illinois	YES	Must post notice.
Indiana	NO	
Iowa	NRS	Must post notice.
Kansas	NRS	Must post notice.
Kentucky	YES	Must post notice.
Louisiana	NRS	Must post notice.
Maine	YES	Must post notice.
Maryland	NO	PSC waiver available.
Massachusetts	NRS	Must post notice.
Michigan	NO	
Minnesota	NRS	Must post notice.
Mississippi	NRS	Must post notice.
Missouri	YES	Must post notice.
Montana	YES	Must post notice.
Nebraska	NRS	Must post notice.
Nevada	NO	
New Hampshire	NO	
New Jersey	YES	Must post notice.
New Mexico	NO	
New York	NRS	Must post notice.
No. Carolina	NO	
No. Dakota	NRS	Must post notice.
Ohio	YES	Must post notice.
Oregon	NRS	Must post notice.
Pennsylvania	NO	PSC waiver available.
Rhode Island	NRS	Must post notice.
So. Carolina	NO	
So. Dakota	NRS	Must post notice.
Tennessee	NO	PSC waiver available.
Texas	YES	Must post notice.
Utah	NRS	Must post notice.
Vermont	NRS	Must post notice.
Virginia	YES	Must post notice.
Washington	NO	PSC waiver available.
West Virginia	YES	Must post notice.
Wisconsin	YES	Must post notice.
Wyoming	NO	

NRS = NO REGULATION SPECIFIED

**FLORIDA PSC INCOMING CALL BLOCK
WAIVERS APPROVED FOR PTC**

PHONE	ADDRESS	CITY	APPROVAL DATE
407-578-1785	220 Clarcona/Ocoee	Orlando	04-01-96
407-578-1785	220 Clarcona/Ocoee	Orlando	04-01-96
407-578-1785	220 Clarcona/Ocoee	Orlando	04-01-96
954-421-9263	229 SW 10 Street	Deerfield Beach	02-05-96
954-421-9295	175 SW 6 Street	Deerfield Beach	02-05-96
954-480-9682	216 SW 1 Court	Deerfield Beach	02-05-96
954-421-9386	299 SW 1 Street	Deerfield Beach	02-05-96
352-493-4049	517 So. Main Street	Chiefland	12-15-96
305-945-9530	1509 NE 153 Terrace	Miami	08-07-95
904-384-6079	855 Stockton Street	Jacksonville	06-22-95
904-384-7573	855 Stockton Street	Jacksonville	06-22-95
904-384-7486	855 Stockton Street	Jacksonville	06-22-95
904-684-3679	CR 315 @ SR 20	Interlachen	06-06-95
904-684-4152	CR 315 @ SR 20	Interlachen	06-06-95
904-684-6668	CR 315 @ SR 20	Interlachen	06-06-95
305-919-9305	163rd Street Mall	Miami	08-10-94
305-919-9403	163rd Street Mall	Miami	08-10-94
305-919-9790	163rd Street Mall	Miami	08-10-94
305-919-9802	163rd Street Mall	Miami	08-10-94
305-919-9871	163rd Street Mall	Miami	08-10-94
305-940-9065	163rd Street Mall	Miami	08-10-94
305-940-9139	163rd Street Mall	Miami	08-10-94
305-940-9374	163rd Street Mall	Miami	08-10-94
305-940-9375	163rd Street Mall	Miami	08-10-94
305-940-9436	163rd Street Mall	Miami	08-10-94
305-940-9468	163rd Street Mall	Miami	08-10-94
305-949-9080	163rd Street Mall	Miami	08-10-94
305-949-9150	163rd Street Mall	Miami	08-10-94
305-949-9152	163rd Street Mall	Miami	08-10-94
305-949-9201	163rd Street Mall	Miami	08-10-94
305-949-0953	163rd Street Mall	Miami	08-10-94
305-949-0753	163rd Street Mall	Miami	08-10-94

305-949-0953	163rd Street Mall	Miami	08-10-94
305-949-7073	163rd Street Mall	Miami	08-10-94
305-949-8212	163rd Street Mall	Miami	08-10-94

<u>PHONE</u>	<u>ADDRESS</u>	<u>CITY</u>	<u>APPROVAL DATE</u>
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305-956-2749	163rd Street Mall	Miami	08-10-94
305-956-2750	163rd Street Mall	Miami	08-10-94
305-948-8345	163rd Street Mall	Miami	08-10-94
305-945-0423	163rd Street Mall	Miami	08-10-94
305-944-0154	163rd Street Mall	Miami	08-10-94
305-944-2083	163rd Street Mall	Miami	08-10-94
305-944-2305	163rd Street Mall	Miami	08-10-94

407-533-5240	6400 South Dixie Hwy	West Palm Bch	12-12-94
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407-893-0231	901 So. Orange Blossom Tr.	Orlando	10-24-90
407-843-2939	901 So. Orange Blossom Tr.	Orlando	10-24-90
407-843-8313	901 So. Orange Blossom Tr.	Orlando	10-24-90

407-648-0020	2015 So.Orange Blossom Tr.	Orlando	10-24-90
407-648-0632	2015 So.Orange Blossom Tr.	Orlando	10-24-90
407-648-2095	2015 So.Orange Blossom Tr.	Orlando	10-24-90

407-240-2207	5898 So.Orange Blossom Tr.	Orlando	10-24-90
407-240-2408	5898 So.Orange Blossom Tr.	Orlando	10-24-90

407-240-4393	5284 So.Orange Blossom Tr.	Orlando	10-24-90
407-240-4490	5284 So.Orange Blossom Tr.	Orlando	10-24-90
407-856-0676	5284 So.Orange Blossom Tr.	Orlando	10-24-90

407-851-6546	7309 So.Orange Blossom Tr.	Orlando	10-24-90
407-851-8037	7309 So.Orange Blossom Tr.	Orlando	10-24-90

813-628-6703	5701 Nebraska Avenue	Tampa	10-24-90
813-628-6704	5701 Nebraska Avenue	Tampa	10-24-90

813-878-9057	1320 E. Waters Avenue	Tampa	10-24-90
813-878-9058	1320 E. Waters Avenue	Tampa	10-24-90

813-628-6757	10815 W. Nebraska Avenue	Tampa	10-24-90
813-628-6758	10815 W. Nebraska Avenue	Tampa	10-24-90
813-628-6759	10815 W. Nebraska Avenue	Tampa	10-24-90
813-628-6862	10815 W. Nebraska Avenue	Tampa	10-24-90

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Attachment B
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PTC

Peoples Telephone Company, Inc.

May 7, 1996

VIA FACSIMILE AND FEDERAL EXPRESS

Ms. Kathy Dyal-Lewis
Bureau of Service Evaluation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Re: Docket No. 960358-TC

Dear Kathy:

This letter is to clarify and expand upon my earlier correspondence of April 25, 1996 concerning the above referenced docket.

With regard to the procedures Peoples will institute to better ensure the proper functioning of the keypad/ringer assemblies in our Florida pay telephones on an ongoing basis (in addition to the comprehensive statewide testing of our Florida stations, as outlined in our April 25th letter), the following will apply:

1. All keypad/ringer assemblies worked on by Peoples in-house refurbishment/repair operations will be tested to assure that the ringer is fully functional before deployment to the field for installation. As part of all new installations in Florida, the service "final check list" followed by our technicians at the time of all new installations will be amended to include a "call receipt" test for ringer functionality and incoming call completion capability.

Peoples will conduct periodic incoming call verification tests at our Florida payphones, as a part of our "Tech Track" system, involving real time field tests by our technicians during their ongoing maintenance/collection activities, and in conjunction with receipt of programming "downloads" while the tech is at the phone on a service visit.

In addition to these internal steps, we will be contacting our equipment suppliers regarding the physical configuration of the keypad/ringer assemblies in the phones, to determine whether any modifications or upgrades may feasibly offer better reliability and performance in the field. If so, Peoples will pursue such modifications with the relevant vendors, as another means to help ensure improved incoming call capability.

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Ms. Kathy Dyal-Lewis
Bureau of Service Evaluation
Florida Public Service Commission
May 7, 1996
Page 2

Concerning the issue of non-timeliness in our responses to certain of the recent service evaluations, as expressed earlier, Peoples always has endeavored to respond expeditiously to any service evaluation and will continue to do so going forward. As also conveyed, although Peoples was delayed in getting back in writing on the resolution of the specific service evaluation issues raised, we did not delay in notifying our field personnel of the actual problems so they could in fact be worked on and timely fixed. Notwithstanding the aforementioned, Peoples has undergone significant personnel reductions in our headquarters staff over the past eighteen months that affected all divisions, including our regulatory evaluation response staff, and this has certainly accounted for the paperwork delay that has been experienced. In view of the importance the Company places on this area of our operational responsibility, and in the spirit of resolving this issue amicably, we have authorized the rehiring of additional full time support staff in our Regulatory Department to help alleviate the present resource constraints. I am confident that once in place this added staff will resolve any future paperwork delay and restore us to our longstanding record of timely responses on our service evaluations.

Kathy, thank you for your consideration of the forgoing information in formulating your recommendation on this matter. Please feel free to contact me with any remaining questions or other information requirements that you may have.

Sincerely,



Bruce W. Renard
Executive Vice President/General Counsel

cc: Mr. Alan Taylor
Mr. Rick Moses
Mr. Steve Alexander

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