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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF HILDA GEER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NOs. 930330-TP & ~~960658-TP~~
SEPTEMBER 3, 1996

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth" or "The Company").

A. My name is Hilda Geer. I am employed by BellSouth as Director - Consumer Market Management-South Florida. My business address is 600 N.W. 79th Avenue, Miami, Florida.

Q. Please give a brief description of your background and experience.

A. I am a graduate of the University of Miami with a degree in Mathematics and Psychology. I have 24 years of service with BellSouth. My career with BellSouth began in Engineering and has continued on to assignments in Network, Sales and Marketing, and Customer Services organizations. The entirety of the last 17 years has been spent in positions of increasing responsibility in the Customer Services environment, Business and Residential Services.

Q. What is the purpose of your testimony?

1

2 A. The purpose of my testimony is to respond to certain issues (Issues 1,
3 2 and 4) raised by the Florida Interexchange Carriers Association, MCI
4 Telecommunications Corporation, and AT&T Communications of the
5 Southern States, Inc., hereinafter referred to as "petitioners", in their
6 joint complaints filed May 24, 1996 and June 11, 1996.

7

8 Q. To which of the petitioners' issues will you be responding?

9

10 A. I will address the issues raised by the petitioners relating to BellSouth's
11 current business office practices.

12

13 Q. What are BellSouth's current business office practices regarding
14 intraLATA toll for new customers? (Issue 1)

15

16 A. The Company's current practice is to inform new Florida consumers of
17 the alternatives available to them for intraLATA toll services in those
18 offices that have been converted to 1+ presubscription. The
19 information is presented in a fair, just and nondiscriminatory manner.
20 The foundation for this balanced approach are three guiding principles
21 for disclosure of information to customers. These principles ensure that
22 Company service representatives fairly and effectively communicate
23 the availability of a number of intraLATA service providers, including
24 BellSouth, to customers. These principles are:

25

1 "Mr./Mrs. Customer, you are now required to select a company
2 to handle long distance calls made within your LATA, as well as
3 calls made outside your calling LATA. BellSouth would like to be
4 your Local To I provider for the calls within your calling LATA.
5 We have been handling these type calls for you in the past.
6 Other carriers do offer this service, I will be glad to advise you of
7 the carriers available, or I can make arrangements for BellSouth
8 to be your carrier of choice."

9
10 Q. Are these prompts effective in creating an awareness to the customer
11 that a number of alternative carriers are available to provide intraLATA
12 services?

13
14 A. Yes. The guiding principles and prompts facilitate an unbiased
15 exchange of information between the customer and the Company's
16 service representative.

17
18 Q. So far your testimony has addressed practices relative to contacts with
19 new customers. Do existing customers contact the Company's
20 business office for reasons other than establishing intraLATA toll
21 service? (Issue 2)

22
23 A. Yes. Customers contact BellSouth's business office for a number of
24 different reasons. Examples of such contacts include, but are not
25

1 limited to, discussing payment arrangements, adding vertical services
2 and termination of service.

3

4 Q. During such contacts with existing customers, do BellSouth's current
5 business office practices require service representatives to discuss or
6 "market" its intraLATA toll services?

7

8 A. No, with the exception of customer contacts involving requests for an
9 additional line. Current practices do not encourage service
10 representatives to discuss intraLATA toll services on all customer
11 initiated contacts. However, as competition evolves, the Company
12 should have the option to advise customers of its service offerings in
13 the most efficient manner. Therefore, the Company should be allowed
14 the opportunity to market its services during any customer initiated
15 contact.

16

17 Q. How is the additional line contact conducted?

18

19 A. When customers contact the business office to add an additional line,
20 service representatives engage in explaining the various alternatives
21 available to the customer for local, intraLATA toll and interLATA toll
22 services. During the interaction concerning intraLATA toll, the
23 Company's service representatives follow the same guiding principles
24 as those developed for new customers. Therefore, customers adding
25 an additional line receive the same balanced presentation.

1

2 Q. Is it necessary to discuss intraLATA toll services when customers call
3 to establish an additional line?

4

5 A. Yes. Customers who arrange for an additional line must be given the
6 opportunity to select carriers for their intra and interLATA needs. The
7 Company's practices ensure a consistent presentation.

8

9 Q. In its presentation to new or existing customers, does BellSouth favor
10 its intraLATA offering over that of an alternative provider?

11

12 A. No. BellSouth does not disparage the services of any carrier.
13 Following the guiding principles described earlier, the Company is
14 forthright in communicating the various alternatives to Florida
15 consumers. The Company's current practices enable the consumer to
16 make an informed decision for intraLATA toll services.

17

18 Q. Is it proper for the Company's representatives to discuss intraLATA toll
19 service when existing customers contact BellSouth for reasons other
20 than selecting their intraLATA carrier ?

21

22 A. Yes. The Commission has determined that competition in the
23 intraLATA market is in the public interest. In addition, the parties to
24 Docket 930330-TP agreed that a "carrier marketing" approach rather
25 than balloting best served Florida customers. BellSouth is one of the

1 competing carriers and should be able to educate consumers about the
2 services it offers. Customer initiated contacts are an appropriate,
3 efficient channel for the Company to advise consumers of its service
4 offerings. As a practical matter, consumers who pro-actively contact a
5 business, any business, have reasonable expectations that the firm will
6 take the time to educate and inform them of service offerings that can
7 meet their needs.

8
9 Q. Do current business office practices fulfill this customer expectation?

10

11 A. Yes. The Company has developed methods and procedures that
12 present to the customer a balanced communication explaining the
13 various alternatives for intraLATA services, including BellSouth.

14

15 Q. The petitioners allege that BellSouth enjoys a "gateway" status,
16 meaning all customers "must come through BellSouth" in order to be
17 made aware of their intraLATA services. They further allege that this
18 unfairly advantages BellSouth. How do you respond to these
19 allegations?

20

21 A. The petitioners allegations are simply without merit. The joint
22 complainants are not infant entrants into the telecommunications
23 industry. These are multi-billion dollar giants with enormous advertising
24 resources. Today, they spend millions of dollars nationally advertising
25 their products and services through every media medium available.

1 They reach millions of readers, television viewers and radio listeners
2 each day with their campaigns. Their assertion that they should be
3 given what I call an "infant preference" is unfounded. Further,
4 BellSouth strives to be responsive to consumers who call its business
5 offices, and it should continue to do so.

6

7 Q. Is the Company's overall approach to explaining the new competitive
8 environment for intraLATA toll service reasonable and fair?

9

10 A. Yes. For the reasons stated earlier, the Company's approach offers a
11 fair and balanced communication of the alternatives available to Florida
12 consumers for local toll services. The Commission should not require
13 the Company to educate consumers on the availability of competing
14 carriers and market for those carriers, without being allowed to advise
15 the customer that BellSouth remains a provider of the service. The
16 Company's approach informs them that they must choose an intraLATA
17 carrier and in no way misleads them into thinking that only BellSouth
18 can provide the service.

19

20 Q. When an existing customer contacts BellSouth and requests a change
21 in their intraLATA service provider, how does the Company process the
22 request? (Issue 4)

23

24 A. If a customer calls to request a change in their intraLATA service to a
25 company other than BellSouth, the Company's service representative

1 asks the end user customer to contact the carrier directly. This
2 minimizes redundancy for the customer during the ordering process
3 since the customer must contact the other carrier anyway in order to
4 establish an account. If a customer so requests, the Company will
5 make the change. The Company, however, still recommends a direct
6 contact between the new intraLATA carrier and the customer. A direct
7 contact ensures that an account with the selected carrier is established
8 in the most efficient manner.

9
10 Q. What is the effect on the customer if the customer fails to contact the
11 carrier directly?

12
13 A. An account will not be initially established for the end user customer
14 with the carrier. The carrier will receive notification to establish an
15 account only when processing is completed. Further, the customer
16 may not understand the range of services offered by the carrier nor the
17 associated rates.

18
19 Q. If required to take these orders for IXCs in Florida, what is the
20 potential impact on the Company?

21
22 A. If BellSouth were required to take orders on behalf of all intraLATA
23 service providers, it would essentially be performing the business
24 office functions for the IXCs without benefit of any compensation for
25 that function. BellSouth's costs associated with implementing

1 intraLATA presubscription would increase since service
2 representative time for obtaining all information necessary to take and
3 issue the order would increase. These additional costs are
4 unnecessary since the customer needs to contact the appropriate
5 carrier anyway. However, if required to handle these orders, such
6 costs should be borne by the IXC's.

7

8 Q. Would you please summarize your testimony?

9

10 A. Yes. The petitioners allege that BellSouth's current business office
11 practices are anti-competitive. It is my testimony that BellSouth's
12 practices and procedures are just and reasonable, offering a balanced
13 presentation of the alternatives available to Florida consumers. I have
14 demonstrated that BellSouth's procedures are not anti-competitive and
15 do not inhibit the development of intraLATA competition.

16

17 Q. Does this conclude your testimony?

18

19 A. Yes.

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