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COMMISSION
CLERK

August 16, 2010

HAND DELIVERED

Ms. Ann Cole, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 100288

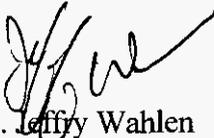
Dear Ms. Cole:

Enclosed for filing in the above docket are the original and 15 copies of the Response of the Small LECs to Request for Additional Information in the above referenced matter.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



J. Jeffrey Wahlen

JJW/jh

Enclosure

cc: All Parties of Record (w/enc.)

COM _____
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DOCUMENT NUMBER DATE

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FPSC-CC-100116-01-1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by TDS Telecom/Quincy)
Telephone Company, Smart City) DOCKET NO. 100288
Telecommunications LLC, d/b/a Smart City)
Telecom, GTC, Inc. d/b/a Fairpoint)
Communications, Northeast Florida Telephone) Filed: August 16, 2010
Company d/b/a NEFCOM, ITS Telecommunica-)
tions Systems, Inc. and Frontier Communications)
of the South, LLC, for Waiver of Certain)
Reporting Requirements in Rule 25-4.0185)
and/or Waiver of Rule 25-4.066; 25-4.070;)
25-4.073; 25-4.110(6); and 25-4.0185, F.A.C.)
Relating to Service Quality)
_____)

**RESPONSE TO REQUEST
FOR ADDITIONAL INFORMATION**

Quincy Telephone Company d/b/a TDS Telecom/Quincy (“TDS TELECOM”), Smart City Telecommunications LLC d/b/a Smart City Telecom (“Smart City”), GTC, Inc. d/b/a Fairpoint Communications (“Fairpoint”), Northeast Florida Telephone Company d/b/a NEFCOM (“NEFCOM”), ITS Telecommunications Systems, Inc. (“ITS”), and Frontier Communications of the South, LLC (“Frontier”), (collectively the “Small LECs”), hereby respond to the Commission’s request for additional information as follows:

1. Please explain what the phrase “reasonable customer service” means as it is used within paragraphs 36, 40 and 42 of the Amended Petition, and how the Small LECs will determine that “reasonable customer service” is being provided if the Commission grants the Amended Petition.

RESPONSE: Under the amended petition, the Small LECs will continue to follow all of the Commission’s rules regarding customer service standards, except for answer time, but the companies would not be required to file the periodic reports required by Rule 25-4.0185, F.A.C. Rather than monitoring customer service via the periodic reports, the Commission would monitor customer service by considering the number of customer complaints registered against each of the small LECs. This means that “reasonable customer service” would continue to be measured relative to the FPSC’s service quality rules (except for answer time).

The Small LECs are committed to providing quality service to our customers which we recognize is an important factor in a competitive marketplace. In today's competitive marketplace and sluggish economy, the small LECs need the flexibility in which to balance pricing and service quality objectives. The small LECs have the expertise and knowledge of their individual markets to ensure that customers receive quality service at the price they are willing to pay. It should be recognized that customer service is an evolving term that must take into consideration changes in market condition, cost, and pricing objectives. This petition does not seek waiver of the requirements for installation or repair. Resolution of any basic customer complaints would be consistent with the existing installation or repair rules. With regard to answer times, it is simply impossible to justify the cost that would be necessary in order to comply with the rule as stated in the Petition. Basic customers calling into the local business offices will be treated no differently than non-basic customers.

2. If the Commission waives the reporting requirements of Rule 25-4.0185, F.A.C., how will the Small LECs respond to a staff data request concerning new service orders, out of service and service affecting troubles for basic residential service customers? Will the Small LECs be willing and able to provide the relevant service orders and trouble tickets for those basic residential service customers for the period being reviewed?

RESPONSE: Yes, the small LECs will be able to respond to staff data requests concerning new service orders and troubles for basic residential customers, but in most cases required data collection will be done manually on an as needed basis and will be time consuming and expensive. However, the need for such data requests should be limited to audits consistent with Rule 25-4.210 or if there is an increase in basic customer service complaints that the Commissioners believe further review is necessary.

3. Rules 25-4.066, Availability of Basic Local Telecommunications Service, and 25-4.070, Customer Trouble Reports for Basic Local Telecommunications Service, F.A.C., require 90 percent of new basic local telecommunications customers to receive service within three working days and troubles to be cleared within 24 or 72 hours, based upon the trouble severity being classified as either out-of-service or service affecting. How do the Small LECs determine whether the service quality objectives expressed in the rules are being met?

RESPONSE: The rules concerning installation and repair do not change with the petition. As for determining whether the service quality objectives expressed in the rules are being met will likely be guided by customer complaints. It is not the intent of the small LECs to conduct internal periodic audits to determine whether or not the objectives are being met. Such expectations would defeat the

purpose of the petition which is to reduce our cost of compliance and to treat us more on par with our competitors.

4. Regarding paragraph 44 of the Amended Petition, please clarify whether the commitment of the small LECs to work with the Commission on an “individual customer complaint basis” refers to complaints received by the commission from basic service customers or to all complaints filed with either the Commission or the respective Small LEC.

RESPONSE: The small LECs are committed to serving the needs of their customers and provide their customer service representatives the flexibility to resolve customer complaints in an effort to satisfy the customer if warranted. As stated in the Petition, the small LECs do not believe the periodic reports provide any indication of the quality of service provided by the LECs given the statutory changes. If there is a significant level of basic customer complaints for a particular company the Commission has the ability to further investigate the underlying cause. The small LECs are not opposed to the Commission assisting a non-basic customer that may have a complaint and will provide to the Commission the resolution of the issue if requested. However, the resolution of any non-basic service complaint will ultimately be determined by the Company.

Respectfully submitted on August 16, 2010.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand Delivery on this 16th day of August, 2010, to the Joint Administrative Procedures Committee, Room 120, The Holland Building, Tallahassee, Florida, 32399-1300, to J. R. Kelly, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-1400, and Rosanne Gervasi, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850

Attorney



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