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From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Friday, October 28, 2011 3:52 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 110013-TP Letter to Ann Cole re: RFP
Importance: High
Attachments: Document.pdf

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B. Docket No. 110013-TP: Request for submission of proposal for relay service, beginning in June

2012, for the deaf, hard of hearing, deaf/blind, or speech impaired, and other implementation

matters in compliance with the Florida Telecommunications Access System Act of 1991

C. BellSouth Telecommunications, LLC d/b/a AT&T Florida

on behalf of Manuel A. Gurdian

D. 3 pages total (includes letter and attachment)

E. BellSouth Telecommunications, LLC d/b/a AT&T Florida's Letter to Ann Cole re: RFP

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DOCUMENT NUMBER - DATE

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10/28/2011

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October 28, 2011

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

Re: Docket No. 110013-TP, Request for submission of proposals for relay service, beginning in June 2012, for the deaf, hard of hearing, deaf/blind, or speech impaired, and other implementation matters in compliance with the Florida Telecommunications Access System Act of 1991

Dear Mr. Cole:

As discussed in Wednesday's Commission Meeting/Workshop, AT&T respectfully submits the attached information for consideration in developing the draft RFP in the above-referenced docket.

We appreciate the opportunity to be involved in the preparation of this new RFP, and we look forward to the bidding process.

Sincerely,

Sidney Minnick
Senior Marketing Manager-Customer Information Services

Attachment

cc: Kevin Bloom
Jerry D. Hendrix
Gregory R. Follensbee
Suzanne L. Montgomery

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Re: Docket No. 110013-TP, Request for submission of proposals for relay service, beginning in June 2012, for the deaf, hard of hearing, deaf/blind, or speech impaired, and other implementation matters in compliance with the Florida Telecommunications Access System Act of 1991,

AT&T Corp. ("AT&T") respectfully submits the following comments for the Florida Public Service Commission's ("Commission") consideration in the development of an RFP in the above-referenced docket.

In-State Relay Call Center

AT&T supports the Commission's belief that an in-state call center is beneficial to the State of Florida, in light of the present economic climate in the State. Although Sprint Communications Company, L.P. ("Sprint") and Hamilton Telephone Company ("Hamilton") argue that providing points for an in-state call center is inconsistent with the intent of the Commission's authority pursuant to Section 427, AT&T respectfully disagrees and believes the Commission should not only evaluate the proposal for an in-state call center but provide significant points since such a call center would be very advantageous to the State.

In today's tough economic climate, many companies are cutting back, scaling down, and/or reducing jobs. AT&T is prepared to invest in Florida's economy, even though not being mandated to do so, by bringing good union paying local jobs for a service that will benefit many Floridians. Because of its significance, AT&T believes that a minimum of 200 points should be allocated to vendors who opt to include an in-state call center in their proposal. Moreover,

- An in-state call center will be very advantageous to Florida and its relay community. Having local Floridians process your relay calls ensures they are familiar with local landmarks, the spelling of cities and other geographical information. Additionally, when local CAs process your calls, regional accents don't inhibit understanding of what a CA voices.
- A center will provide 40-60 new job opportunities for Floridians.
- While some states mandate an in-state center, many others encourage providers to consider the inclusion of an in-state center in their RFP response.
- Other providers are currently opening new in-state CapTel call centers, which emphasizes the importance of a local presence in other states.
- AT&T understands the learning curve that occurs when new CAs are hired for a newly awarded contract. Our intent is to process Florida call volumes using our experienced CAs while new CAs are trained. This process will eliminate any concerns expressed over the quality of service rendered to Relay customers in Florida.
- It's important that we stress that these will be Communications Workers of America (CWA) jobs with excellent benefits, and we believe we are the only relay provider that has a Union workforce solution.

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Paisley Report

Sprint proposes to use results of the Paisley report in the pricing portion of the RFP. AT&T believes such a proposal is purely self-serving and inappropriate. This is due, not only to the fact that the RFP already takes into consideration the items in the Paisley report in the technical portion of the RFP, but also to the fact that the report is a 3rd Party document that has not been before the Commission nor evaluated by the Commission and the parties as to its pros and cons or how the report and the results contained therein are determined and should be used in this process.¹

While the Paisley Index provides some value in measuring and comparing relay providers, it fails to accurately measure key performance indicators required by state specific contracts. Paisley also fails to factor in the individual provider's Methods and Procedures which are designed to improve the customer experience. The only way to ensure that providers are measured and compared accurately against one another would be if all providers were offering the same service in the same state under the same contract requirements. Since this is not the case, AT&T cautions against relying on third party reports such as Paisley.

AT&T believes the Paisley Index fails to provide a reliable means for producing and analyzing the performance of relay providers, specifically answer time and typing. Paisley fails to factor in the individual provider's Methods and Procedures which are designed to maximize the customer experience, but which may be unfairly impacted by the Paisley methodology for measuring words per minute. In addition, the latest Paisley information was from a very small sample of calls observed from early 2011, and providers may have improved or declined in performance since that period.

AT&T CAs are trained to verify spellings and intentionally slow down their typing while they are verifying spelling and content before resuming optimal typing. This assures a continuous and smooth process versus typing fast and stopping several times. Paisley starts and stops timers depending on whether or not the CAs are typing. If the typing stops, so does the timer, thereby discounting the effect of the overall contact. AT&T's method provides a consistent customer experience, and ensures accurate capture of verbatim comments from the customer as required by the FCC.

In conclusion, AT&T opposes the introduction and inclusion of any RFP scoring methodology related to a Paisley report or any other form of third party analysis that provides additional points. The Commission has tried to remove any subjective analysis in this RFP. The use of the Paisley report in the RFP would take the Commission in the other direction.

Thank you for your consideration of the above comments.

¹ Use of such a report, could be the basis of a protest of the RFP by a party, as the use of the report would result in aspects of the RFP being considered twice while all other aspects of the RFP would not.