ORIGINAL ATTACHMENT B

Petition by BellSouth Telecommunications, Inc.'s Waiver of Rules 25-4.107, 25-4.108, and 25-4.113, Florida Administrative Code

Docket No. DDDDQB-TL

2 COPIES
REDACTED INFORMATION

AFA	
APP	
CAF	
CMU	and the second
CTR	
EAG	
LEG	
MAS	
OPC	
RRR	
SEC	1
WAW	-
OTH	-
	-

00355 JAN 108 000011

- 1					
2	EXHIBIT A				
	BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION				
3 4 5 6	In re: Petition by BellSouth Telecommunications, Inc., for Waiver of Rules 25-4.107, 25-4.108, and 25-4.113, Florida Administrative Code Filed:				
7	STATE OF FLORIDA				
8	COUNTY OF MIAMI-DADE				
9 10	AFFIDAVIT OF AND AND				
	Before me, the undersigned authority, personally appeared				
•	who stated that she is currently				
2	for BellSouth Telecommunications, Inc. ("BellSouth"), and who				
13	stated that she is currently - For BellSouth, and				
14	further state the following:				
15	1. I, am a person over the age of 21 residing in the				
16	state of Florida. My title is for BellSouth,				
7	a Georgia Corporation. I have been in that position since 1990. My business				
18	address is Florida				
19	2. I, am a person over the age of 21, residing in the				
20	state of Florida. My title is the state of Florida. My title is the state of Florida. I have				
21	been in that position since 1997. My business address is				
Qа	Florida Florida				
23	3. We are submitting this Affidavit in support of BellSouth's Petition for				
24	Rule Waiver.				

- 1 We compiled the information contained in Exhibit B based on our 4. 2 personal knowledge and experience with the person(s) and locations set forth 3 therein. 5. The person in question has obtained telecommunications service from 5 BellSouth using a variety of fraudulent means, has incurred substantial unpaid bill balances with BellSouth, has supplied BellSouth with invalid and false information, and attempted to pay for service with checks that were returned due to insufficient funds. This has occurred at the locations set forth in Exhibit B: 9 6. BellSouth has expended a great deal of time, effort, and expense in 10 its dealings with this person. // 7. Further affiants sayeth not.
- WITNESSES:

 /3

 /4

 /5

 /6

 /7

 /8 SWORN TO AND SUBSCRIBED Annay;

 /9 BEFORE ME THIS DAY OF 2000.

 20

 21 NOTARY PUBLIC, STATE OF FLORIDA

 22 AT LARGE

 PC docs 189897

23



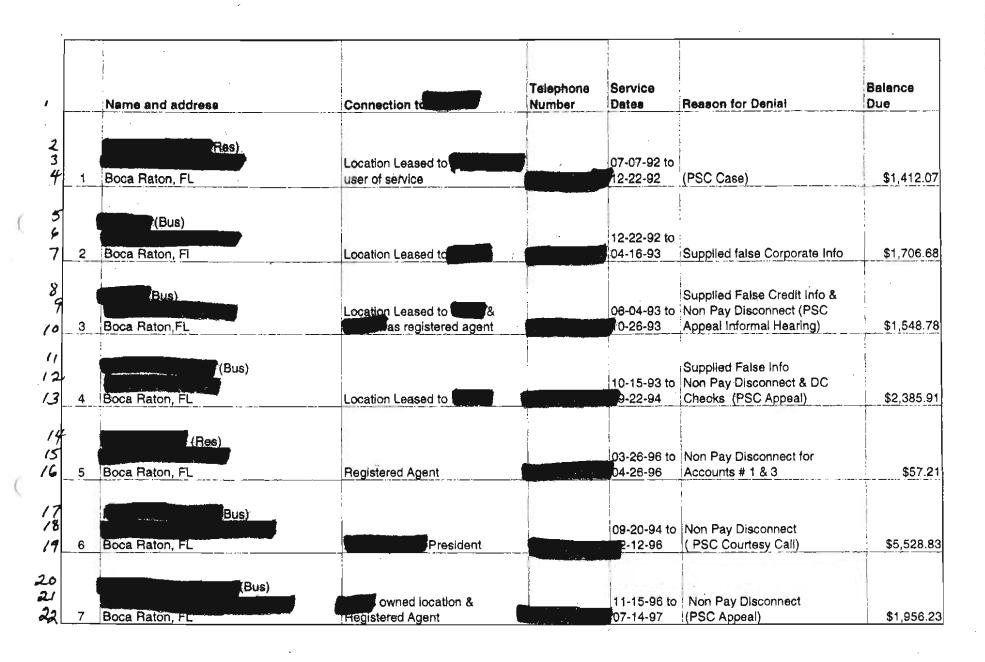


Exhibit B

12		(Bus)		12 12 08 to	Non Pay disconnect	
3	88	Boca Raton, FL	Location Owned by	07-14-97	(No PSC Handled Informally)	\$1,182.24
456	9	(Bus).	Location Owned by	06-06-97 to	Non Pay Disconnect (PSC Appeal)	\$723.82
7890	10	(Res)	Location Owned by Two stop payment checks by	01-05-98 to 08-24-98	Non Pay Disconnect & No Valid Corp(PSC Appeal)	\$1,334.14
11 12 13 14	11	(Res)	Location Owned by	02-06-98 to	Non Pay Dsiconnect for Account	\$563.06
15 16 17 18	12	Bus) Boca Raton, FL	Location Owned by	06-09-98 to 03-11-99	Non Pay Disconnect	\$808.31
19 20 21	13	(Bus) MemoryCall Voice Mail Box No Address	Sole Office	11-29-98 to	Non Pay Disconnect for this Account & # 7	\$199.05
33 23 23	14	(Bus) Boca Raton, FL	Owns Location/director signed Dishonored Check Acct Name changed from	08-21-98 to 04-09-99	Non Pay Disconnect	\$1,069.61
25 26 27	15	Boca Raton, FL	Owns location & Director 2nd Line for #14	09-02-98 to	(PSC Case)	\$735.86



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;								
	- 3803	16	(Res)	Owns Property &		03-31-99 to	Non Pay disconnect & No Documents	\$169.98
	456	17	Boca Raton, FL	Owns Property & Aversa Rented Room/Provided Documents	change to	08-02-99 to 10-15-99	Disconnected at Customer Request	\$193.07
	789	18	(Bus)	Dwns		03-16-99 application Date	Tried to connect after #12 was disconnected/Held for \$285 Deposit-Fraud Credit Info	No Bill
	10 11 12	19	(Bus) Highland Beach, FL	wns		05-21-99 application	Tried to connect after #12 was disconnected/Held for \$250 Deposit-Fraud Credit Info	No Bill
	13/4	20	Boca Raton, FL	Dwns		05-14-99 to 06-03-99	Non Pay Disconnect	\$794.38
	16	21	(Res)	Dwns		04-09-99 to 07-03-99	Disconnected by Mr.	\$198.57
	19 20 81	22	(Bus)	Owns		07-03-99 to 07-28-99	Disconnected Non Pay & Suspected Fraud/Acct Closed Check //Aversa Acct	\$192.90
	223	23	(Bus)	Owns		07-26-99 New Connect	Cancelled before connected- Final Bill & Fraud # 22	No Bill

•				
lu.k.	(Res) Memory Call Voice Mail Box No Address	Landlord (See # 16 &17	BellSouth cancelled for Final Oct-99 Bills #16 & 17	No Bill
456	(Res)	Owns	BellSouth cancelled for Final Oct-99 Bills #16 & 17	No Bill



SOCIAL PROVIDED ON ACCOUNTS
SOCIAL SECURITY NUMBER ON

DRIVERS LICENSE CHECK

Between 1979 & 1980 TO

PROVIDED IN NEW YORK
Between 1979 & 1980 TO

BOCRIS notes on account #2
Claimed he had the above two social security numbers because his original was stolen while he was in college. If this is the case why is Mr.

Social Security number, which would be the old number?

Also is a person allowed to have two social security numbers?

SYNOPSIS

1	Account # 1- PSC Appeal
23456789	Connected at the Connected on 12-18-92. FB amount is \$1412.07 Service was denied 11-97 because customer had given incorrect SS #. PSC appeal received on 11-12-98 and service was restored until the investigation was completed. The location was found to be leased to Account was subsequently denied on 12-18, for no payment and documents/fraud. Toll Call dispute.
10	Account # 2- (No PSC Appeal) (Part of Informal)
13 14 16 17 18 19 20 21	Connected at Boca Raton. Account was denied 1-93, for fraud since the business was not listed as a corporation in Tallah. The customer was also questioned about an outstanding final bill at the address, for the location was disconnected for failure to provide proof of ID. Investigation through the landlord determined the occupant of the location was Service was subsequently restored after Mr. It is paid a \$250.00 deposit. (PSC Appeal) This customer claimed the reason he had two social security numbers, and the was in college. Toli Call dispute. Service disconnected April 1993-fraud-established by the land of the location with
25 26 81	Account # 3 (PSC Appeal received under Account #3 Informal) Connected at Boca Raton . Deposit requested due to TCL, denied 7-93. Corporation not registered with State of Florida.
	was never a Florida corporation, so Mr. is solely responsible for this account. (See PSC write up

Account #4- (PSC Appeal)

Service Connected a Boca Raton. Customer had 3 disputed toll charges. Corporation status for this Corp was not completed 4 until 8-25-94. Service connected 10-15-93. was advised that he was soley responsible for this account. Customer gave BellSouth several stopped payment checks. Because the customer had paid this 7 account with the same checking account, he had proven to 8 be the sole person responsible for both accounts. (# 3 & #4) Informal PSC 9 conference was held 1-31-95, where the customer was advised by Paula /o Isler, PSC, to provide BellSouth with corporation papers for the two // questionable accounts. After receiving copies of one paper from Mr. /2 in March 95, BellSouth Legal advised that the information provided by Mr. was not Florida Corporation papers. The information was not /y acceptable for corporation verification. The document was for K and was not acceptable as a viable corporation to do business as a of a corporation in another State. The corporation was aware and /r advised he had been using their name without their authorization. The 19 Account was disconnected 10-93. Final bill amount of \$2,385.91.

20 Account No. 5 (RES)

2/ Boca Raton, FL.

This PSC appeal was filed because the customer was denied service for account. The actual service was interrupted for the final bill for (#1). Customer referred to PSC hearing 1995. The 1995 hearing did not deal with this matter. Since Mr. The had signed a 26 returned check on Mr. The service was disconnected.

27 Account No. 6 (PSC CC/Inquiry)

Boca Raton, FL

3/ PSC appeal customer requested BS write a letter stating BS would restore

the business service until the appeal was resolved, that LEC's could deny

for failure to pay for LD charges. BS, Mr. and the PSC held two

telephone conferences with the customer. The PSC legal office sent the

customer a letter stating that LEC's could bill and deny service for carrier

charges.

Account No. 7) (PSC Case NO. 174737-I Informal) Boca Raton, FL 4 Service connected 12-12-96 after #6 was disconnected for non payment on 7-14-97. Disputed LCi calls, but never provided a valid claim. Also customer (failed to provide a valid billing responsibility party and the corporate info 7 provided was not valid, PSC was involved with an informal conference call. Customer also disputed collect calls from the Palm Beach County jail 9 during the time Mr. vas incarcerated at the jail. /o Account No. 8 (Bus) (No PSC Appeal Handled informally) Boca Raton, FL /3 Service was connected on 12-12-96 and was billed to /y information was that was a corporation with Mr. as president. It was /< determined there was not valid corporation in Florida and the customer /s was advised the billing would be changed to the name of /7 The customer did not pay the bills and disputed the billing and said he /// requested a transfer of contract, but did not provide the papers. A 12 conference call was held with the PSC and the customer then stated that 20 he had filed for personal bankruptcy in April 1997. The customer did not 21 pay the bill and the service was disconnected on 7-14-97 for non payment. 22 The customer never provided bankruptcy papers. The final bill amount is 23 \$1,182.24.) (Bus) PSC Appeal Account No. 9 25 Boca Raton, Fl. 24 Service was connected on 6-6-97 when the other service at the location (No 7) was subject to disconnect. Service disconnected 11-23-97 for non 27 28 payment. Final bill amount is \$723.82.

/ Account No. 10 (Res) PSC Appeal (22402-I closed 9-23-98) Boca Raton, FL 4 Connected 1-5-98 originally at Highland Bch. 5 FL. The order was subsequently transferred to the above address in August 1998, 1 changed the account to be billed in the name of , still a Res service. advised he & was the Pres of the Corporation. The business Rep who took the order failed to obtain a letter from the business stating they would be 10 responsible for the billing. In addition, Mr. Management alled to provide // BellSouth with the requested documents as to his identity due to a 12 discrepancy with his social security number. (two other parties were 13 identified as using the same social security number, one being The customer also had a claim with MCI for charges he claimed /s were to be billed direct by MCI. MCI sustained the charges and when BS // advised the customer payment was needed, two checks, stop payment, /7 were written by on the account. These payments were to /8 prevent the denial of the service. The check was returned for Stop Payment /1 and the service was subsequently denied. The customer filed a PSC ao appeal, and a conference call resulted in claiming that he 21 was the officer. BS advised the account would be completely disconnected and a new number/service provided for See No. 14) 24 Account No. 11 (Bus) 25 Boca Raton, FL 26 Connected 2-6-98. Toll Claim Aug 1998. Disconnected 10-12-98 Non 2) Payment for Account No. 10 at same address. Final Bill amount \$563.06

(9)

/ Account No. 12 (Res) Boca Raton, FL Service was connected at I Highland Beach, FL, and subsequently transferred to Beca Raton, FL The transfer request was initiated by The service was disconnected on 3-11-99 for non payment. The final bill amount is \$808.31. At this time customer connected service on 3-31-99 at the same location. (See No. 16) Account No. 13) (No Psc) No service address VMS Only (No Corp # on Account) only a tax Number on account. Sole Officer. Service was connected on 11-19-98 and disconnected on 02-03-99 for non payment of the final bill in the amount of \$199.05. /Y Account No 14(PSC Appeal 245981R 14 Boca Raton, Fl. 17 Connected 08-21-98 at same location where (No. 10. / 11 & 12) lines were connected. Note that the account was connected just prior to the date that No. 10 was disconnected on 8-24-98 for non-payment. مد A PSC case was received on this account with the customer claiming a 2) dispute with the bill and Sprint calls, but never provided a details of the as dispute. Toll Blocks were added in March 99, and the service was denied 23 on 4-9-99, to be disconnected on 4-26-99. Prior to this service being 24 disconnected for non-payment, service for 2√ (No. 16) was connected on 3-31-99. Since fraud was suspected on the 26 account, Toll Blocks were placed and ID documents were 27 requested. Note that Mr. was incarcerated on March 17, 1999 and 28 remained incarcerated until the end of April 99 at the Broward County Correctional Facility. Collect calls were placed to this number and from the Correctional facility during the in addition to was there. (Also ref No. 10 & 16). 31 time Mr.

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Account No. 15
  (PSC Appeal 245981R)
                           Boca Raton, FL
 4 This service was connected on 9-2-98, after account
                           No. 10) was disconnected for BS Incorrectly
  changing the residential billing, not the class of service into
   Investments with no paperwork. ( PSC Appeal under
 8 See No. 4.
 9 Account No 16
/º PSC Inquiry Courtesy Call 273390C
                         Boca Raton, Fl.
/2 Connected on 3-31-99, when Mr.
                                      knew that he was in danger of
/3 losing service on #14 & #15. Customer claims he rents a room from Mr.
                                   Boca Raton, FL. Toli Blocks were
removed after the customer provided documents showing he previously
16 resided at a different address when the previous Final Bill
               was incurred. This account was denied on 4-24, eiter a check
                                                   was received. The
18 of $302.83, written on a closed account for Mr.
19 customer was denied on 6-30-99 for non payment of a past due balance of
20 $214.03 and failure to provide a valid lease. The lease provided was not
2/ property notarized. Specifically the signature of the landlord, was not
22 notarized. The service was disconnected for non-pay on 7-1-99. The
23 customer then made a toll claim with
                                                  and was given a credit of
bill. 2y $59.85 applied to new service by carrier in error on the Sept 7th bill.
                       The final bill amount is $169.98.
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Account No. 17-Number changed to Boca Raton, FL 4 Customer requested new service with the same number as No. 16 after he claimed to have a toll claim. BST's outside legal counsel handled the customer at this time. After the customer made a toll claim, service was connected with a \$200 deposit, customer also was to pay \$50 deposit, but b he failed to advise the payment agency and the \$50 was applied as a 9 payment to Account 16. In September the customer changed the number to and the customer was noticed for the current charges and # also the final account No. 16. The customer attempted to Transfer the 12 service to without written notice and BST 13 placed the order on hold. The customer then placed an order for a new /y service Memory Call in the Sky #24 and subsequently called to disconnect which was done on 10-15. BST then / the working service for /F cancelled the order for #24 since no written authorization was given. Mr. gave Mr. Dermission to discuss this account and Mr. 18 placed most of the calls about the account to BST and BST's outside legal 19 counsel. The final bill amount is \$193.07. 20 Account No. 18 Boca Raton, FL 22 Attempts were made to connect new service in the above corporate name 23 on 3-16-99, at Boca Raton. The account was held at for a \$285 deposit, which was not paid. The Registered Agent was given as with no social security number. A call back number of 20 26 was given on the new connect for a Mr. The customer 27 requested the order be cancelled after he was advised he needed to speak 28 with the collections office about a Business Final Bill at the location Another attempt was made to 27 30 connect service at **Boca Ration for** on 4-8-99. This time the registered Agent was shown as 32 and a contact # of this order 33 was placed on hold for a \$250 deposit and the order was cancelled.

1 Account 19 2 **Boca Raton, FL** Tried to connect this service on 3-19-99, at after was disconnect, before connected service No. 13. 2 After the customer was told he needed to speak with the collections office about a final bill at the location, the customer cancelled the order. Only info given was The order was placed on hold for \$285 deposit, but the customer cancelled the order. Account No. 20-10 Boca Raton, FL 11 Service was connected at Boca Raton, FL. (See 16 /2 & 17) Service was denied on 6-3-99 for tell protection and suspected fraud 13 due to invalid employment information. Service was disconnected on 6-3-/y 99 and the final bill amount is \$794.38. // Account No. 21 Highland Beh, FL 17 Service was connected at an address which was previously occupied by Highland. (See No. 12) The 15 customer first installed this service at Boca, which and with have previous services. (See No 5, 8 & 20 is owned by 21 12) Customer gave employment information that he worked at 22 hwhich is listed for Also 23 provided Personal Ref as The service was denied on 6-30-99 for non-payment of the past due amount of \$140.65 and 26 for suspected fraud and toll protection. The customer provided fraudulent 27 employment information when the service was established. This service 28 was disconnected on 7-3-99, at the request of a Mr. 2-5 amount is \$198.57.

1	Account No. 22-
2	Highland Beach, FL.
34567	Connected on 7-3-99. The order was incorrectly released and connected after a \$200 deposit was requested. The service was disconnected for non payment and for a \$200 deposit check that was written on a closed account for Also the Corporate papers on file with the State did not match credit info. Final bill amount is \$192.90.
8	Account No. 23 -
9	Highland Beach, FL
10 11 12 13	
14	Account No. 24
/6	Attempted to connect Mail Box in the Sky after service for 17 was in danger of disconnect. Order issued on 10-14, with a 10-15 due date. The order was cancelled as the request was not in writing and for final bills on # 16 & 17.
18	Account No. 25
19	, Boca Raton, FL
21	Attempted to connect service on 10-19 under the same number the customer had disconnected (No. 17) after refused service for No. 24. This order was cancelled for the non- payment of the final bills and fraud.