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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

RUDOLPH'S, INC. (Your Full Name) COMPLAINANT	2004-00001
VS.	
BELLSOUTH TELECOMMUNICATIONS, INC. (Name of Utility) DEFENDANT	

COMPLAINT

The complaint of RUDOLPH'S, INC. (Your Full Name) respectfully shows:

(a) Rudolph's, Inc.
(Your Full Name)

P. O. Box 69, Murray, KY 42071-0069
(Your Address)

(b) BellSouth Telecommunications, Inc.
(Name of Utility)
The Prentice-Hall Corporation System, Inc.
421 West Main Street, Frankfort, KY 40601
(Address of Utility)

Principal Office:
1155 Peachtree Street NE
Suite 1800
Atlanta, GA 30309-3610

(c) That: Defendant provides a T1 line to Plaintiff for long
(Describe here, attaching additional sheets if necessary, the specific act, fully and clearly, or facts that are the reason and basis for the complaint.)
distance telephone service. The line is defective and service is frequently lost for substantial periods of time. A list of outages is attached hereto. Defendant has refused to correct the defective condition of the line or provide

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Formal Complaint

RUDOLPH'S, INC. vs. BELLSOUTH TELECOMMUNICATIONS, INC.

a redundant line to avoid unreasonable outages. Defendant's failure to provide adequate service violates the provisions of 807 KAR 5:061 and KRS 278.030(2).

Wherefore, complainant asks that Defendant be ordered to provide a
(Specifically state the relief desired.)

redundant T1 telephone line that will minimize service outages.

Dated at Benton (Your City), Kentucky, this 24th day of December (Month), ~~19~~2003.

Robert L. Prince
(Your Signature)

Robert L. Prince, PRINCE & BRIEN, P.S.C.
P. O. Box 466, Benton, KY 42025-0466
(Name and address of attorney, if any)

Rudolph's INCORPORATED

BellSouth outages

Date	Time	Duration	Problem	Called	Other	Cause/Resolution
6/18/2002	7:09 am	5 hours	T1 down			BellSouth replaced smart jack
8/13/2002	9:50 am	4.5 hours	T1 down			BellSouth replaced smart jack
10/2/2002	11:00 am	3 hours	T1 down			BellSouth repaired 120 ft arial cable damaged by garbage truck
10/21/2002	9:25 am	7 hours	T1 down			BellSouth found grounded pair
11/4/2002	5:57 pm	5.5 hours	T1 data down			BellSouth mis op mux
4/28/2003	3:47 pm	3 hours	T1 down			BellSouth cable problem
5/6/2003	2:42 pm	4.1 hours	T1 down			BellSouth cable problem at 400 pr cable
6/4/2003	11:37 am	3.4 hours	T1 down / bouncing			BellSouth local loop errors, resolved itself
6/13/2003	6:14 am	8 hours	T1 down			BellSouth found 2 bad repeaters, bad F1 cable, open pair, mouse chewing cable, and 50 volt ground
7/3/2003	pm		Lines 6, 8 - no dial tone	BS, PSC	BellSouth incorrectly closed ticket as CPE trouble	Dial tone returned, no explanation from BellSouth
7/3/2003	5:43 pm		Stacy's outbound fax line - no dial tone			Dial tone returned, no explanation from BellSouth
7/9/2003	11:55 am	2.2 hours	T1 down, smartjack dark	Lamb, PNG, PSC, KW, Judy	Qwest called to ask if circuit was down	BellSouth took down in error - lost pair (incorrectly documented) during 400 pair cutover to repair damage at Dutch Essenhaus
7/9/2003	8:00 pm	13.5 hours	All local lines down	BS, Judy, Lamb, PSC		Part or all of two SLICs down, widespread outage including Airport Rd

7/29/2003	10:39 am	2.8 hours	All local lines down	Lamb, PSC, BS/REAO, Judy		Coldwater Rd SLIC down, damaged by lightning
8/04/2003	1:47 pm	0.9 hours	Local lines 4, 5, 6 - no dial tone	Lamb, BS/REAO, PSC		Reorder/busy for a few seconds, then dial tone returned, no explanation from BellSouth
11/21/2003	2:06 pm	3 minutes	All local lines down	Lamb		
11/26/2003	6:18 am	2.3 hours	T1 down	PNG, Lamb, KW		Unofficial report of multiplexor failure at BellSouth Central Office in Murray

Other

Date	Description
9/23/2003	BellSouth offered credit of $878.27 plus tax for local line outages in July 2003, to be applied to next monthly bill.

Contacts

Lamb	David Lamb, Manager, BellSouth local office
BS	BellSouth Repair Office
BS/REAO	Ramona McCauley, BellSouth Regulatory External Affairs Office
PNG	PowerNet Global - T1 provider
KW	Kelly & Wilmore - local agent for PowerNet Global
Judy	Judy Roth, Phone Center of Murray
PSC	Kentucky Public Service Commission

Customer Contact
Mickey Hill
Rudolph's Inc
2021 Rob Mason Rd
PO Box 69
Murray KY 42071
(270) 753-0686 x124
(800) 231-2295 x124
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mickey@rudolphtire.com

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