

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DANIEL PALOMO OF UTILITIES ANALYSES, INC.)
ON BEHALF OF KENTUCKY STATE UNIVERSITY)

COMPLAINANT)

v.)

BELLSOUTH TELECOMMUNICATIONS, INC.)

DEFENDANT)

CASE NO. 95-486

ORDER TO SATISFY OR ANSWER

BellSouth Telecommunications, Inc. ("BellSouth") is hereby notified that it has been named as defendant in a formal complaint filed on October 25, 1995, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, BellSouth is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 20th day of November, 1995.

ATTEST:

D. M. [Signature]
Executive Director

PUBLIC SERVICE COMMISSION

[Signature]
Chairman

[Signature]
Vice Chairman

[Signature]
Commissioner

Formal Complaint

Daniel Palomo of Utilities Analyses (UAI)
on behalf of Kentucky State (KS/WS)
(Your Name)

Bell South
(Utility Name)

Page 2

Wherefore, complainant asks that a credit/refund be issued for the
(Specifically state the

amount paid to Bell South for the lines in question, using the last date of
relief desired.)

usage or order activity. And not a date deemed adequate by Bell South.

Dated at Parlin, New Jersey, ~~Kentucky~~, this 10 day
(Your City)

of October, 1995.
(Month)


(Your Signature)

(Name and address of attorney, if any)

Section 15. Forms. (1) In all practice before the commission the following forms shall be followed insofar as practicable:

- (a) Formal complaint.
 - (b) Answer.
 - (c) Application.
 - (d) Notice of adjustment of rates.
- (2) Forms of formal complaint.

Before the Public Service Commission

(Insert name of complainant))

COMPLAINANT)

No.)

Daniel Palomo of vs. Bell South)
Utilities Analyses, Inc. (UAI))
on behalf of Kentucky State U. (KSU))

(To be inserted by the secretary)

(Insert name of each defendant))

DEFENDANT)

COMPLAINT

The complaint of (here insert full name of each complainant) respectfully shows:

(a) That (here state name, occupation and post office address of each complainant).

(b) That (here insert full name, occupation and post office address of each defendant).

(c) That (here insert fully and clearly the specific act or thing complained of, such facts as are necessary to give a full understanding of the situation, and the law, order, or rule, and the section or sections thereof, of which a violation is claimed).

WHEREFORE, complainant asks (here state specifically the relief desired).
That correct credit be given for nine lines billed.

Dated at Parlin, NJ, Kentucky, this 19
av of October 1995

Daniel Palomo of UAI on behalf of KSU

(Name of each complainant)

(Name and address of attorney, if any)

(3) Form of answer to formal complaint.

Before the Public Service Commission

(Insert name of
complainant))

COMPLAINANT)

Daniel Palomovs, Bell South)
of UAI on behalf)
of KSU)

(Insert name of each
defendant))

DEFENDANT)

No. _____
(To be inserted
by the secretary)

ANSWER

The above-named defendant, for answer to the
complaint in the proceeding, respectfully states:

That (here follow specific denials of such
material, allegations as are controverted by the
defendant and also a statement of any new matter
constituting a defense. Continue lettering each
succeeding paragraph).

WHEREFORE, the defendant prays that the
complaint be dismissed (or other appropriate
prayer).

Bell South

(Name of defendant)

(Name and address of attorney, if any)

UTILITIES ANALYSES, INC.

404 321 6677

POST OFFICE DRAWER 460668
ATLANTA, GEORGIA 31148

FACSIMILE 404 321 6788

DAN PALOMO 908-727-1726 FAX 908-727-6433

April 10, 1995

Ms Evvy Curtis
South Central Bell

Re: Kentucky State University
502-223-4464
502-223-5898
502-223-8359

Dear Ms Curtis;

During our telephone conversation on 4/5/95 I mentioned I was currently doing a physical inventory of Kentucky State University's (KSU) telephone system. The three main numbers above have a total of nine lines all of which were found with NO Bell demarcation (RJ) point. I was able to trace the dial tone for the lines up to a telephone closet on the third floor of the J. Carroll building (room 323 closet 322). The lines are on house blocks no longer used for live lines. I am asking that Bell show KSU where these lines are working on a verified Bell demarcation point.

I have listed some of my findings that may help in your investigation. Mr. Mike Fitzpatrick, the full time ROLM technician, has confirmed my findings. If you have any questions or would like to discuss anything please feel free to contact me at 908-727-1726. Thank you for your time and cooperation..

Sincerely,



Dan Palomo

- 1) All nine lines show installed around 12/83 and are ring no answer
- 2) Five of the lines are billed for CBT05's, obsolete data interfaces, which have not been used by KSU since 1987, per Ray W. manager of the KSU data center.
- 3) A search of the data center (even the raised floor area) found no trace of these lines. Ray W. confirmed these lines not working on any equipment since he has been there (1987).
- 4) ROLM has been in charge of all on campus telecommunications since they put in their system 1984 and all in house wiring. NO records of these numbers exist.
- 5) KSU comptroller, Ms Black has no records of these numbers.


COPY

The factors that point to these lines not working for KSU longer than the one year period of time are:

- a) all lines went in 12/30/83 so it appears they were being used for the same purpose, and all lines were found on the original abandoned Bell cable going to the third floor.
- b) five of the nine have CBT's billed to them (obsolete data interfaces) and not used by KSU since 1987.
- c) no activity on any of the accounts since at least 1992 per South Central Bell's own records, that was only to add these to a summary bill.
- d) no, RJ or CBT's were found and no house wire other than Bells old original cables were found on these lines.
- e) Bell technicians were the only ones to work on the original cables all working lines were put on RJ-21X's for ROLM to connect in house.

I would appreciate you checking into this matter. If you have any questions or wish to get in touch with me please feel free to call me at 908-727-1726. Thank you for your time and cooperation.

Sincerely,



Dan Palomo

UTILITIES ANALYSES, INC.

404 521 6877

POST OFFICE DRAWER #20908
ATLANTA, GEORGIA 31148

FACSIMILE 404 521 6708

June 2, 1995

Mr. Don Mill
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort KY 40602

Re: Kentucky State University

Dear Mr. Mill:

I am asking that the Public Service Commission look into a decision made by South Central Bell to issue credit for only one year. The credit is related to nine lines (see attached CSR's) that were not found working on any demarcation point or at any customer equipment, by South Central Bell's technician.

I have placed all of the facts in sequential order so that it will be easier to follow.

- 1) the original inquiry was sent to Ms Evvy Curtis of South Central Bell on April 10, 1995 (see the attached letter).
- 2) during my telephone conversations with Ms Curtis I learned that these accounts had no activity for many years. In fact the last account to show any activity was 502-223-4464 and that was on 6/04/92, when this and all other accounts were summary billed.
- 3) on 4/25/95 it was decided that a Bell technician would do a physical inventory.
- 4) my call to Ms Curtis on May 2, 1995, found that the technician had gone out and could not find any of the nine lines on a demarcation point nor could he find any trace of them working (five of the lines are still being billed for CBT02/05's). At that time Ms Curtis informed me that she had talked to Ms Sharon Black, comptroller of KSU, and that she had agreed to a one year credit. Ms Curtis also informed me that it was policy for only six months credit to be given in these situations.
- 5) On 5/03/95 Ms Black informed me that she was under the impression that only six months was what Bell was required to give credit for, and that the one year given was extra.
- 6) A twelve month credit appeared on the May 04, 1995 main bill for all nine lines.

The factors that point to these lines not working for KSU longer than the one year period of time are:

- a) all lines went in 12/30/83 so it appears they were being used for the same purpose, and all lines were found on the original abandoned Bell cable going to the third floor.
- b) five of the nine have CBT's billed to them (obsolete data interfaces) and not used by KSU since 1987.
- c) no activity on any of the accounts since at least 1992 per South Central Bell's own records, that was only to add these to a summary bill.
- d) no, RJ or CBT's were found and no house wire other than Bells old original cables were found on these lines.
- e) Bell technicians were the only ones to work on the original cables all working lines were put on RJ-21X's for ROLM to connect in house.

I would appreciate you checking into this matter. If you have any questions or wish to get in touch with me please feel free to call me at 908-727-1726. Thank you for your time and cooperation.

Sincerely,



Dan Palomo

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE

(SVC CDR 21)
NR (NON-PUB) KENTUCKY, STATE
UNIVERSITY/DCN HOME
1A 0 1 MAIN ST
9A 0 1 MAIN ST
1 FRANKFORT
LOC DES (J CARROLL ACDCM SV)
DZIP 40601
YFH NONE
SIC 8281
ANN 96
ZAEC K1592

---DIR
DEL AB, BB, CC, DD, EE

---BILL
BNI KY STATE UNIV
BAE E MAIN ACADEM SVC BL
BAS E DONALD BUTERA
PO 40601
TAX 8880
TAN 000,837
PACT KXXX
BTH 802 227-6000-838
MAN 88830
TFA ST
SD (1) 000-00-0000

HTG ---SRE
A 8359, 2994, 4412, 4426

HTG	---	SRE	A	8359, 2994, 4412, 4426	(CHARGEABLE LISTINGS)	NR
123003	NON	1	NPA			NR
021006	NON	2032994	1	1FB	(LINES & STATIONS) /TN 223-2994/TBE A/PIC 0288 /HTG A/NMC/PCA BL, 01-27-86	33.36
123003	NON		1	YTB	/TN 223-2994	3.00
021141	300		1	AHAKC	/TN 223-2994/TBE A	0.05
123003	NON		1	NJLIC	/TN 223-2994	NR
021584	300		1	9ZR	/TN 223-2994/TBE A	6.00
021006	NON	2234412	1	1FB	/TN 223-4412/TBE A/PIC 0288 /HTG A/NMC/PCA BL, 01-27-86	33.36
123003	NON		1	YTB	/TN 223-4412	3.00
021141	300		1	AHAKC	/TN 223-4412/TBE A	0.05
123003	NON		1	NJLIC	/TN 223-4412	NR
021584	300		1	9ZR	/TN 223-4412/TBE A	6.00
021006	NON	2234426	1	1FB	/TN 223-4426/TBE A/PIC 0288 /HTG A/NMC/PCA BL, 01-27-86	33.36
123003	NON		1	YTB	/TN 223-4426	3.00

CUSTOMER SERVICE RECORD

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE				
021141 300	1	AHAKC	/TN 223-4426/TBE A	.05
123003 300	1	NJLIC	/TN 223-4426	NR
021584 300	1	9ZR	/TN 223-4426/TBE A	6.00
020786 300	1	1FB	/TN 223-8359/TBE A/PIC 0288 /HTG A/NMC/PCA BL, 01-27-86	33.36
021141 300	1	AHAKC	/TN 223-8359/TBE A	.05
123003 300	1	NJLIC	/TN 223-8359	NR
021584 300	1	9ZR	/TN 223-8359/TBE A	6.00
123003 300	1	YTB		3.00
123003 300	4	CBY02		27.60
011584 300	4	HTG		73.36

ORDER NO	COMPLETED	SERIAL NO	POSTED	CYCLE	REASON
788911588	03-01-95	953050ZBB01	03-02-95	3850	
BONEL 71-	03-01-95	YJTKMPD	03-01-95	R	
802238359C	02-06-95	RATECHANGE	02-19-95		

---RNKS
RNKN (A) PCL 1TN, 00-04-92, ANN L
EADS, 502 227-6000

LOCAL SVC BILLED ELSEWHERE

ATTCON LOCAL SVC	270.56
INTEENSTATE CALC	0.00
SOUTH CENTRAL BELL LOCAL SVC	24.00
BILLED LOCAL SERVICE	24.00CR
	0.00

CUSTOMER SERVICE RECORD

EXCH
FRFT

CI SVC
1FB

SVC ESTB.
12-30-83

PRINTED
02-28-98

SLA

DPA

PAGE PF
0001

NPA CO LINE CUST
802 221-6020 229

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE ON EQUIPMENT BTC TOTAL REVENUE

(SVC CDE 81)
NF (NON-PUB) KENTUCKY STATE
UNIV/UNIV/260N NONE
LA # 8 MAIN ST
BA # 8 MAIN ST
/ FRANKFURT
LOC DFS (HOME HALL MONTH)
DZIP 40601
YFH NONE
SIC 8221
AIRM 40
ZARC NID02

---DIR
DEL A0, B0, C0, D0, E0

---BILL
NHI KY STATE UNIV
RAC E MAIN ACADEMIC SVC BL
SAS % DONALD BUTENA
PO 40601
TAX 80000
TAM 000.007
PACI XXXX
RTM 802 227-6000-030
NAM 20000
TYA ST
SS (1) 000-00-0000

---SEE

123083 NON

1 NPS (CHANGEABLE LISTINGS)

NH

020786 NON

1 IFB (LINES & STATIONS)
/IN 225-6090/106 A/PIU 0200
/LPS/MHC/PCA BL, 01-27-80

55.51

062141 200

1 ARKOC /IN 225-6090

0.06

123083 NON

1 NJTIC /IN 225-6090

0.06

062484 200

1 YZN /IN 225-6090

0.06

123083 NON

1 TIS

0.06

123083 NON

1 CMT08

0.06

ORDER ACTIVITY
ORDER NO. COMPLETED SERIAL NO. PASTED CYCLE REASON
ZK00018500 02-01-95 951800/00010 01-02-95 0050
SOMEL 11- 03-01-95 YJTRFD 03-01-95 N
5022256090NC 07-06-95 RATECHANGE 02-19-96

CUSTOMER SERVICE RECORD

EXCH
FRFT

CI SVC
1FB

SVC ESTB.
12-30-83

PRINTED
02-28-98

SLA

DPA

PAGE PF
0002

NPA CO LINE CUST
802 221-6090 229

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE ON EQUIPMENT BTC TOTAL REVENUE

LOCAL SVC BILLED ELDENHNE

49.2

ATTCOM LOCAL SVC

0.0

INTERSTATE CALL

0.0

SOUTH CENTRAL NFII LOCAL SVC

0.0

BILLED LOCAL SERVICE

0.0

EFF DATE TAX IDENT NUMBER KG NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE

(SVC CDF 31)

NP (NON-PUB) KENTUCKY STATE UNIVERSITY/DOH NONE

1A 0 E MAIN ST

9A 0 E MAIN ST

LOC DES (J CARROLL ACDCM SV)

DZIP 40601

YFH NONE

SIC 8231

ANM 44

ZAEC K1892

---DIR

DEL A0, B0, C0, D0, E0

---BILL

BN1 KY STATE UNIV

BA2 E MAIN ACADMC SVC HL

BA3 E DONALD BUTERA

PO 40601

TAX 8NNO

TAR 000,837

PACE XXXX

BTM 502 227-6000-038

MAN 20830

IYA ST

GS (1) 000-00-0000

HTO ---SEE A 4464, 4471, 4478, 4487

EXCH	CL SVC	SVC ESTB.	PRINTED	SLA	DPA	PAGE PF	NPA CO LINE CUST
FNFT	1FB	12-30-83	02-28-96			0002	502 223-4464 315
123003	NON			1	NP3	(CHARGEABLE LISTINGS)	NR
012406	NON			1	1FB	(LINES & STATIONS)	
123004	NON			1	TTB	/TN 223-4464/TBE A/PIC 0288	33.35
062191	200			1	HTG	A/NMC/PCA BL, 01-14-86	
123005	NON			1	HTB	/TN 223-4464	3.00
052604	200			1	AH8KC	/TN 223-4478/TBE A	.05
123006	NON			1	RJ11C	/TN 223-4464	NR
052604	200			1	9ZR	/TN 223-4464/TBE A	6.00
012406	NON	2234471		1	HTG		3.00
123003	NON			1	1FB	/TN 223-4471/TBE A/PIC 0288	33.35
062191	200			1	HTG	A/NMC/PCA BL, 01-14-86	
123005	NON			1	TTB	/TN 223-4471	3.00
052604	200			1	AH8KC	/TN 223-4471/TBE A	.05
012406	NON	2234478		1	RJ11C	/TN 223-4471	NR
				1	9ZR	/TN 223-4471/TBE A	6.00
				1	1FB	/TN 223-4478/TBE A/PIC 0288	33.35

CUSTOMER SERVICE RECORD

EXCH	CL SVC	SVC ESTB.	PRINTED	SLA	DPA	PAGE PF	NPA CO LINE CUST
FNFT	1FB	12-30-83	02-28-96			0002	502 223-4464 315
123006	NON			1	TTB	/TN 223-4478	3.00
062191	200			1	AH8KC	/TN 223-4478/TBE A	.05
123005	NON			1	RJ11C	/TN 223-4478	NR
052604	200			1	9ZR	/TN 223-4478/TBE A	6.00
012406	NON	2234487		1	1FB	/TN 223-4487/TBE A/PIC 0288	33.35
123006	NON			1	TTB	/TN 223-4487	3.00
062191	200			1	AH8KC	/TN 223-4487/TBE A	.05
123005	NON			1	RJ11C	/TN 223-4487	NR
052604	200			1	9ZR	/TN 223-4487/TBE A	6.00

ORDER ACTIVITY

ORDER NO	COMPLETED	SERIAL NO	POSTED	CYCLE	REASON
7XMB0004/MB	03-01-95	463060/BN004	03-02-95	3860	
ZKMB0006/MB	03-01-95	463060/BN008	03-02-95	3860	
BONEL 11-	03-01-95	YJTKNPD	03-01-95	R	
BONEL 11-	03-01-95	YJTKNPD	03-01-95	R	
5022234404KC	02-06-96	NA1ECHANGE	02-19-96		

---RMKS

RMKS (A) PCL LTR, 06-04-92, ANN L

EADS, 502 227-6000

LOCAL SVC BILLED ELSEWHERE

ATTNOM LOCAL SVC	246.96
INTERSTATE CALC	0.00
SOUTH CENTRAL BELL LOCAL SVC	24.00
BILLED LOCAL SERVICE	24.00CR
	0.00



Kentucky State University Frankfort, Kentucky 40601

January 30, 1995

South Central Bell
P.O. Box 66002
New Orleans LA
70166-6002

To Whom It May Concern:

We have engaged Utilities Analyses, Inc., as telecommunications consultants.

South Central Bell is authorized and requested to respond to Mr. Daniel "Dan" G. Palomo in all matters pertaining to our telephone accounts. You are authorized to deliver to Mr. Palomo any requested billing records, equipment & service records, order activity reports and any other matters or information pertaining to the investigation of our telephone accounts.

This letter of authorization is valid for all our locations until further written notification.

Very truly yours,

A handwritten signature in cursive script that reads "Sharon Black".

Sharon Black

Acting Comptroller
Kentucky State University

cc: Mr. Daniel "Dan" G. Palomo
Telecommunications Analyst
Utilities Analyses, Inc.
Post Office Drawer 450968
Atlanta, GA 31145