

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CLOSE CONSULTING, INC. ON BEHALF)
OF COLUMBIA GREENVIEW REGIONAL)
HOSPITAL)
)
COMPLAINANT)
)
v.) CASE NO. 96-493
)
BELLSOUTH TELECOMMUNICATIONS, INC.)
)
DEFENDANT)

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 16, 1996, 1996, 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 25th day of October, 1996.

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

ATTEST:


Executive Director

2/ BD

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
OCT 16 1996
PUBLIC SERVICE
COMMISSION

In the Matter of:

HCA Greenview Hospital
(Your Full Name)
COMPLAINANT
VS.
Bell South
(Name of Utility)
DEFENDANT

Case No. 96-493

C O M P L A I N T

The complaint of Close Consulting, Inc. respectfully shows:
(Your Full Name)

(a) John Close
(Your Full Name)

1945 Scottsville Rd., Suite B2, Bowling Green, KY 42104
(Your Address)

(b) Bell South
(Name of Utility)

9100 Shelbyville Rd., STE 300, Louisville, KY 40222
(Address of Utility)

(c) That: (See attached explanation.)
(Describe here, attaching additional sheets if

necessary, the specific act, fully and clearly, or facts
that are the reason and basis for the complaint.)

Formal Complaint

Close Consulting, Inc vs
(Your Name)

BellSouth
(Utility Name)

Page 2

Wherefore, complainant asks that BellSouth refund
(Specifically state the

for the lines back to November 14th, 1991,
relief desired.)

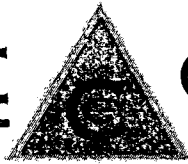
plus taxes and interest. We estimate the
refund to be approximately \$33,729.20.

Dated at Bowling Green, Kentucky, this 10th day
(Your City)

of October, 1996.
(Month)

Jim J. Choe
(Your Signature)
Frank Smith
550 E. 10th St., Bowling Green, KY 42101
(Name and address of attorney, if any)

CLOSE



CONSULTING

RECEIVED
OCT 11 1996
PSC Consumer Services

BellSouth has refused to issue a refund for lines (see enclosed listing of lines) that were ordered disconnected on November 14th, 1991. The facts of the complaint are as follows:

1. Close Consulting contacted BellSouth on Greenview Hospitals behalf after an initial audit revealed that these lines were still on the billing cycle.
2. BellSouth informed Close Consulting that in order to issue a refund for these lines that Greenview needed to produce written documentation requesting that these lines were to be disconnected. BellSouth's policy was and is that BellSouth does not ask for documentation when you change service of any type. This was confirmed by George Sanders, Director of BellSouth Billing. He may be reached at (502) 582-8600. It has been our experience that this is BellSouth's way of getting out of issuing a refund as they know that they never ask for written documentation.
3. After speaking with Steve Smith at Greenview, he thought that he may have been able to come up with a memo that made the above request, even though BellSouth does not require this information. When we called BellSouth to let them know that we possibly had a document that would verify our claim, they stated to us that they still would not issue a refund even if we had written documentation. Subsequently, we were not able to produce the document.
4. BellSouth then told Close Consulting that they had Greenview sign off on a document when Greenview switched to Club Billing in 1995 which verified all lines. We asked for a copy of this document and they produced the attached sheet. As you can see, no where on this document are there any numbers and signed off by Greenview. We again asked for correct documentation and they denied us this request saying that it was an internal document. BellSouth has yet to produce such documentation.
5. Even if BellSouth can produce documentation, that still does not account for prior to switching to club billing.
6. It is obvious to us that BellSouth does not keep good records. We had sent them a letter of agency at the beginning of our audit. When we filed for the refund less than a month later, BellSouth again asked for this letter of agency stating that they showed no record of it. When we asked them if they can't keep a simple document for one month, how could they keep a document for 4 years, they suddenly said they had our letter of agency.
7. Apparently, BellSouth has made this same mistake before. A company called QCI found that a line that was requested by Robert Eckhart to be disconnected on May 1995 was still active. As of June 1996 the number was still on the bill. I have enclosed this for your review.
8. The fact of the matter is that BellSouth has shown a consistent pattern of this. We have encountered this with other clients as well and BellSouth has not had a problem in refunding those accounts. We feel that because of the size of the refund, that is where the problem lies. BellSouth has refused to be cooperative with us in resolving this matter and did not care if we filed a formal complaint with the public service commission.

**COLUMBIA Greenview
Regional Hospital**

1801 Ashley Circle
P.O. Box 90024
Bowling Green, Kentucky 42102-9024
Fax (502) 793-5205/Phone (502) 793-1000
COLUMBIA's home page is <http://www.columbia.net>

September 30, 1996

TO WHO IT MAY CONCERN:

This is to advise you that we have secured the consulting services of Close Consulting who, until further notice, will be acting as our agent in matters involving the auditing of bills which we receive from your company.

Please give them your full cooperation in providing them with copies of bills, Customer Service Records, and any other related documentation that they may require.

Additionally, Close Consulting will be acting in our behalf in arranging for meetings with your representatives, in placing service orders and in negotiating with you for any credits and/or refunds that may be due as a result of their audits.

Your cooperation and assistance will be greatly appreciated.

Sincerely,



Mike Mitchell, CFO

Customer Request

RF-602 (12/93)

Please refer to the instructions for completing this form, and for certain contingencies.

Former Bill Name Greenview Hospital	Bill Address Greenview Hospital
Enhanced Billing Services Billing Number 502 M 74-	ATTN Accounts Payable
Requested Start Month July 01	1801 Ashley Circle
and Billing Period	Bowling Green Ky 42104

Section I - Billing Options (Check All That Apply)		Contact Name Tim Staffill
<input type="checkbox"/> Large User Bill (Generic) <input type="checkbox"/> Large User Bill with Options - Complete Section II <input type="checkbox"/> Mag Tape Bill - Complete Section III <input type="checkbox"/> BellSouth Regional Summary Bill - Complete Section IV A or IV D <input type="checkbox"/> BellSouth Diskette Analyzer Bill - Complete Section V <input type="checkbox"/> CLUB* FMI - Complete Section VI <input type="checkbox"/> CEPS		Contact Number 502 793-5110
		Number of Paper Bill Copies 1

<input type="checkbox"/> S <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>This is the document that Bell South sent to us saying that Greenview signed off on the numbers. No where on this document is the numbers or signature of the Greenview Rep.</p>	Bill FIDV Code Set
		B
		E
		D
		C
		SS
		TC
		PB
		PI
		PI
USD		
ST		
One Time Charge		
LUS51		
LUS61		
TS		
ICS		

USOC Summary Options:			
<input type="checkbox"/> USOC Summary (without station detail)	<input type="checkbox"/> LUS7X	<input type="checkbox"/> LUS71	<input type="checkbox"/> US
<input type="checkbox"/> USOC Summary with Station Detail	<input type="checkbox"/> LUS7X	<input type="checkbox"/> LUS71	<input type="checkbox"/> USS
<input type="checkbox"/> USOC Summary by Location	<input type="checkbox"/> LUS7X	<input type="checkbox"/> LUS71	<input type="checkbox"/> USL
<input type="checkbox"/> USOC Summary with Station Detail by Location	<input type="checkbox"/> LUS7X	<input type="checkbox"/> LUS71	<input type="checkbox"/> USSL
G. USOC Summary Level and Frequency Options (select only if USOC Summary was selected above)			
USOC Summary at all Sort Levels (default)	<input checked="" type="checkbox"/> F0	Monthly (default)	<input checked="" type="checkbox"/> M
USOC Summary at Level 1 Sort Option	<input type="checkbox"/> F1	Annually	<input type="checkbox"/> A
USOC Summary at Level 2 Sort Option	<input type="checkbox"/> F2	Semi-annually	<input type="checkbox"/> S
USOC Summary at Level 3 Sort Option	<input type="checkbox"/> F3	Quarterly	<input type="checkbox"/> Q
<input type="checkbox"/> H. Purchase Order Sort			<input type="checkbox"/> PO
<input type="checkbox"/> I. Do Not Print Zero Rated USOC Option			<input type="checkbox"/> NZ
<input checked="" type="checkbox"/> DA			<input checked="" type="checkbox"/> DA

Section IIA - Large User Bill Microfiche		
<input type="checkbox"/> Copy of Large User Bill on Microfiche		<input type="checkbox"/> MF
Marketing Representative Signature	Contact Number	Date
Bob Kewers	502 8247	5-17-95
Enhanced Billing Services Representative Signature	Contact Number	Date

II. Local Exchange Service

A. Trunks

In May 1995, Robert Eckhart, BellSouth representative, combined the medical center's accounts into the Club Bill format. At that time, three lines, 502-781-8332, 502-782-0489, and 502-781-5388 were requested to be disconnected and removed from billing. As of May 1996, 502-781-5388 still appears on the BellSouth monthly bill.

We reviewed traffic reports from the Definity PBX dated October, 1995 and April, 1996 to compare traffic usage on the Direct Inward Dial Trunks. These reports were consistent in the amount of calls coming in over the twenty-seven trunks. They indicated that seventeen trunks were required to carry the traffic.

Recommendations

Contact BellSouth to ensure that 502-781-5388 is disconnected and removed from billing, and also to request credits due. The credit should cover the period from May, 1995 through May, 1996. This particular line cost \$41.70 per month. The credit should be \$500.40, plus taxes paid.

Based upon the traffic reports, and industry standard traffic engineering methodologies, we recommend that ten of the twenty-seven Direct Inward Dial trunks ~~be disconnected and removed from billing.~~ Direct Inward Dial trunks cost \$72.71 each per month. The elimination of these trunks will produce annual savings of \$8,752.00

One Time Charges:	\$ 00.00
One Time Credits:	\$500.40
Annual Savings:	\$ 8,752.20

ALLSOUTH



BILLING NUMBER 502 M74-1065 065
BILLING PERIOD JUN 1, 1996 00021
PAGE 45

CHARGES FOR NO DI AVAILABLE

MONTHLY SERVICE

228. MONTHLY SERVICE - JUN 01 THROUGH JUN 30 153.20
TOTAL REGULATED MONTHLY SERVICE 153.20
TOTAL NONREGULATED MONTHLY SERVICE00

BREAKDOWN BY STATION NUMBER

502 526-6960 1.00
502 726-8367 1.00
502 746-0799 36.00
502 781-4330 7.00
502 781-5388 35.00
502 781-7895 0.00
502 783-9091 36.00
502 842-4061 36.00
COMMON EQUIPMENT/SERVICE WITH NO STATION NUMBER ASSIGNED 0.00

229. INSIDE WIRING REPAIR PLAN 2.00
TOTAL REGULATED MAINTENANCE PLANS(S)00
TOTAL NONREGULATED MAINTENANCE PLANS(S) 2.00

BREAKDOWN BY STATION NUMBER

502 781-5388 2.00

230. TROUBLE DETERMINATION SERVICE 0.00
TOTAL REGULATED MAINTENANCE PLANS(S)25
TOTAL NONREGULATED MAINTENANCE PLANS(S)00

BREAKDOWN BY STATION NUMBER

502 781-5388 0.00

231. FEDERAL COMMUNICATIONS COMMISSION SUBSCRIBERS LINE CHARGE 24.00
TOTAL REGULATED FCC CHARGE 24.00
TOTAL NONREGULATED FCC CHARGE00

BREAKDOWN BY STATION NUMBER

502 746-0799 6.00
502 781-5388 6.00
502 783-9091 6.00
502 842-4061 6.00

232. KENTUCKY TELECOMMUNICATIONS RELAY SERVICE 0.00
TOTAL REGULATED RELAY SERVICE00
TOTAL NONREGULATED RELAY SERVICE40

BREAKDOWN BY STATION NUMBER

502 746-0799 0.00
502 781-5388 0.00
502 783-9091 0.00
502 842-4061 0.00

TOTAL MONTHLY SERVICE 179.85

ITEMIZED CALLS