

## **COMMENTS BY THE SMALL COMPANY COMMITTEE OF THE WISCONSIN STATE TELECOMMUNICATIONS ASSOCIATION**

### **INTRODUCTION**

The following comments are submitted to the Public Service Commission of Wisconsin (the "Commission") by the Small Company Committee of the Wisconsin State Telecommunications Association, which includes the incumbent local exchange carriers listed on Attachment A (collectively the "Small Company Committee").

These Comments address whether the Commission should adopt the proposed revisions to PSC Chapter 165 – Consumer Protection Rules. For the reasons set forth in these Comments, the Commission **should NOT** adopt the proposed revisions as presented by staff. As an alternative, the Small Company Committee would support the Commission proceeding further to evaluate technical standards and issues.

### **COMMENTS**

As you know, on June 11, 2002, the Commission gave notice-soliciting Comments on possible revisions to Chapter 165 – Consumer Protection Rules for all ILECs, CLECs and resellers. The Commission presented the rule in two parts: technical standards and issues, and consumer protection issues. The Commission is now considering whether it should adopt rule changes for consumer protection.

These proposed rule changes include new regulations in applications for service, customer billing, information available to customers, deposits, deferred payment agreements, service restrictions, disconnection of service, customer complaints, dispute procedures and telephone directories. The Commission **should NOT** adopt these new regulations. The Small Company Committee believes these rule changes are a shotgun approach to solving perceived problems and will cause hardship to all small telephone companies in the state.

In addition, the Small Company Committee believes new regulations will not improve the few registered complaints filed against small telephone companies. The excellent customer care record of Wisconsin's small telephone companies is reflected in Attachment B ("Complaints Filed with PSCW"). Rather than improve already excellent customer service, the proposed rule changes will likely sidetrack service operations to focus on administrative procedures. In addition, new regulations will likely result in delays in providing service, additional expense to the consumer for rule implementation and burdensome paperwork for already very productive small telephone company staff.

## **CONCLUSION**

As you know, Wisconsin's small telephone companies take great pride in providing good, reasonably priced service to their customers. The people they serve in small towns are their friends and neighbors and they are committed to meet their needs. In most cases, installation and repair service is regularly provided Monday through Saturday and repair service is provided after hours, on Sundays and holidays as required. In addition, their plant facilities are constantly being improved and upgraded to meet customer's needs and keep pace with current technologies.

With the introduction of customer choice, the consumer makes the decisions. They are afforded the opportunity to change providers if that provider does not live up to their expectations. It is in the small telephone companies' best interest to aggressively retain its customers if they want to survive and gain market share. Today, the customer does not make their choice of a telecommunications provider based on who regulates them. If these new rules are put into place, the regulatory jurisdiction of the small telephone company will be part of the process of choice.

Imposing the proposed rules on small telephone companies who have excellent records of service does not seem logical. They have had little or no complaints filed with the Commission. This record does not come by accident. It comes from a philosophy that quality of service is everything. Their approach is simple: they make themselves very accessible and visible to the public. They train their employees well. They are stakeholders in this business and their personal reputations in their communities are at stake. A solid reputation built over many, many years speaks for itself. The proposed rules will not improve this reputation, but only sidetrack their initiatives to focus on procedures instead of focusing on what is most important .....the customer.

In addition, the Small Company Committee has reviewed the Comments of the WSTA and fully supports those comments.

Sincerely,

Michael D. Jensen  
Chairman  
WSTA Small Company Committee