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August 7, 2002

Mr. Dale Hardy Roberts  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**FILED**<sup>3</sup>  
AUG 07 2002

**Re: TC-2002-349**

**Missouri Public  
Service Commission**

Dear Mr. Roberts:

Enclosed for filing on behalf of Spectra Communications Group, LLC d/b/a CenturyTel ("CenturyTel"), please find an original and eight (8) copies of a Response of Spectra Communications Group, LLC d/b/a CenturyTel to Complainant Langerud.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:   
Sondra B. Morgan

SBM/lar  
Enclosure

cc: Dan Joyce  
Michael Dandino  
Frances Langerud  
Sherry Kohly

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>

AUG 07 2002

Missouri Public  
Service Commission

Frances Langerud, )  
)  
Complainant, )  
)  
v. )  
)  
CenturyTel, )  
)  
Respondent. )

Case No. TC-2002-349

**RESPONSE OF SPECTRA COMMUNICATIONS GROUP, LLC  
d/b/a CENTURYTEL TO COMPLAINANT LANGERUD**

Comes now Spectra Communications Group, LLC d/b/a CenturyTel ("CenturyTel") and for its Response to Complainant Langerud states to the Missouri Public Service Commission ("Commission") as follows:

1. On June 4, 2002, counsel for CenturyTel discovered through a review of the Commission's Web-based orders that the Commission had issued an Order to Show Cause to CenturyTel based on the company's failure to respond to a Notice of Complaint issued January 29, 2002. Before June 4, neither CenturyTel nor its counsel was aware of the consumer complaint that is the basis of this case.

2. On January 19, 2002, Ms. Frances Langerud filed a Complaint with the Commission in which she disputed the late charges which had been assessed on her billing statement prior to the 31<sup>st</sup> past due day. She attached copies of her billing statements for September, October and November of 2001 and January of 2002. Ms. Langerud disputed the \$1.20 late fee assessed on these statements as well as the fact that her bill was considered past due in less than thirty (30)

days. After CenturyTel was made aware of this complaint and after review of the complaint and researching the customer's account, CenturyTel filed a Response on June 7, 2002, offering the following explanation and proposed resolution.

After review of Ms. Langerud's account, CenturyTel found that Ms. Langerud should not have been charged the late fee. Ms. Langerud was only charged the late fee for the four months listed above for a total amount of \$4.80. CenturyTel has issued a credit for this amount to Ms. Langerud as well as a \$25.00 courtesy credit for any inconvenience this has caused. Ms. Langerud has been contacted by phone by a Customer Service representative, and a copy of the letter sent to Ms. Langerud by Toni Conway, CenturyTel's Quality Assurance Analyst, was attached as Exhibit B to that Response.

3. On June 7, 2002, the Commission issued its Order Setting Response Time stating that any responses to the Response filed by CenturyTel must be filed no later than July 8, 2002.

4. On or about July 8, Complainant Langerud filed a response stating that the problem had not been resolved to her satisfaction and attaching a copy of her bill dated June 6 which did not reflect any credit. Neither Counsel for CenturyTel or the company received a copy of this response and were only made aware of it through a phone call from the Commission Staff on August 5.

5. On July 12, the Commission issued an Order Directing Filing Staff Investigation and Report in which it directed its Staff to investigate the issues in this case and file a report of its findings no later than August 12, 2002.

6. In response, CenturyTel states that the credits promised to Complainant Langerud have been made to her account and are reflected on her bill dated July 6, which is the earliest

these credits could have been shown as it can take up to two billing cycles before a credit is reflected on a customer's bill. In addition, the \$4.80 credit owed for late fees was increased to \$25.00 to compensate the customer for any inconvenience. Attached as Exhibit A is a copy of Ms. Langerud's July statement which reflects these credits.<sup>1</sup>

7. Spectra Communications Group, LLC d/b/a CenturyTel began providing service in Missouri on August 1, 2000. Because of the possibility of billing problems during the transition, CenturyTel did not begin assessing late fees on any customers' bills until September of 2001. The customers were notified in advance that their bills could be subject to a late fee of \$1.20 if not paid within thirty (30) days. In February of 2002, CenturyTel was made aware of a programming error where in some cases a customer was being assessed a late fee before the thirty-first day of the billing cycle. This programming error was corrected in March of 2002, and all customer representatives were instructed to remove the late fee from the customer's bill when it was brought to their attention.

For all the reasons stated above, CenturyTel respectfully requests that the Commission accept its Response and dismiss the Complaint.

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<sup>1</sup>An additional \$100.00 credit is also shown on this bill, as when the CenturyTel customer representative spoke to Ms. Langerud she discovered that Ms. Langerud no longer runs a business from her home, although the phone service continued to be listed under "The Snoop Shop," and she was being charged a business rate. CenturyTel changed her service to residential and issued a credit for the period of time when the business was no longer the customer.

Respectfully submitted,

  
Sondra B. Morgan #35482  
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(573) 635-0427 (fax)  
smorgan@brydonlaw.com (email)

Attorneys for Spectra Communications Group,  
LLC d/b/a CenturyTel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 7<sup>th</sup> day of August, 2002, to the following parties:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Michael F. Dandino  
Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Frances Langerud  
23009 Rt. AA  
Paris, MO 65275

  
Sondra B. Morgan

A partner of Spectra

PAGE 1 - CTB

ACCOUNT NUMBER 660-327-4558  
BILLING DATE 07/06/02

| PREVIOUS BALANCE                       | PAYMENTS | CREDITS/ADJS | PAST DUE AMOUNT | CURRENT CHARGES | PAST DUE |
|----------------------------------------|----------|--------------|-----------------|-----------------|----------|
| 11.92                                  | 11.92CR  | 25.00CR      | 25.00CR         | 100.05CR        | 08/05/02 |
| SUMMARY OF PREVIOUS BILLING            |          |              |                 |                 |          |
| PREVIOUS BALANCE                       |          |              |                 |                 |          |
| PAYMENT RECEIVED ON JUL 06 - THANK YOU |          |              |                 |                 |          |
| BILLING ADJUSTMENT ON JUL 13           |          |              |                 |                 |          |
| PAST DUE AMOUNT                        |          |              |                 |                 |          |
| SUMMARY OF CURRENT CHARGES             |          |              |                 |                 |          |
| Spectra Local CHARGES                  |          |              |                 |                 |          |
| TOTAL CURRENT CHARGES                  |          |              |                 |                 |          |
| ESTIMATED AMOUNT DUE                   |          |              |                 |                 |          |
| TOTAL AMOUNT DUE                       |          |              |                 |                 |          |

Toll Free Customer Service Numbers:  
Spectra Communications Group, LLC  
Home Service 1-800-872-4016  
Repair Service 1-800-824-2677  
Payment Arrangements 1-800-666-0004

For complete billing detail, please review both front and back of each page.

YOUR ACCOUNT CONTAINS A CREDIT - DO NOT PAY

BILLING DATE 07/06/02  
ACCOUNT NUMBER 660-327-4558  
TOTAL CHARGES DUE BY 08/05/02  
TOTAL CREDIT BALANCE - DO NOT PAY

FRANCIS LANGRISH  
23009 ROUTE AA  
PARLE NO 65275-2483

016603227455807000000000009566032270706020000000000

EXHIBIT

A

tabbles

PAGE 1 - CTS

A partner of Spectra

ACCOUNT NUMBER 660-327-4558  
BILLING DATE 07/06/02

|                                                |                        |          |          |
|------------------------------------------------|------------------------|----------|----------|
| MONTHLY SERVICE DETAIL                         |                        |          |          |
| LOCAL SERVICE IN ADVANCE FROM JUL 06 TO AUG 06 |                        |          |          |
| 1 PTY RESIDENCE LINE                           |                        | 7.00     |          |
| FEDERAL UNIV SERVICE CHG                       |                        | .37      |          |
| TOTAL LOCAL EXCHANGE SERVICES                  |                        |          | 7.37     |
| SUBSCRIBER LINE CHARGE - INTER                 |                        |          |          |
| MONTHLY SERVICE AMOUNT FOR 660-327-4558        |                        |          | 6.00     |
|                                                |                        |          | 13.37    |
| ADD 1 PTY RESIDENCE LINE                       |                        |          |          |
| 0                                              | 7.00 JUN 07 TO JUL 06  | 90.75    |          |
| ADD INTERSTATE EXCL BUS SUB                    |                        |          |          |
| 0                                              | 5.00 JUN 07 TO JUL 06  | 64.85    |          |
| REMOVE 1 PTY BUSINESS                          |                        |          |          |
| 0                                              | 14.00 JUN 07 TO JUL 06 | 101.55CR |          |
| REMOVE INTERSTATE EXCL BUS                     |                        |          |          |
| 0                                              | 5.00 JUN 07 TO JUL 06  | 64.85CR  |          |
| FEDERAL TAX                                    |                        | 3.19CR   |          |
| STATE TAX                                      |                        | 3.91CR   |          |
| COUNTY SALES TAX                               |                        | .93CR    |          |
| CITY SALES TAX                                 |                        | 1.85CR   |          |
| 911 SERVICE SURCHARGE                          |                        | 11.62CR  |          |
| CITY FRANCHISE FEE                             |                        | 1.02CR   |          |
| MISC CHGS/ADJS FOR 660-327-4558                |                        |          | 116.12CR |
| TOTAL MONTHLY SERVICE AMOUNT                   |                        |          | 13.37    |
| TOTAL MISC CHGS/ADJS                           |                        |          | 116.12CR |
| FEDERAL TAX                                    |                        | .44      |          |
| STATE TAX                                      |                        | .57      |          |
| COUNTY SALES TAX                               |                        | .14      |          |
| CITY SALES TAX                                 |                        | .27      |          |
| 911 SERVICE SURCHARGE                          |                        | 1.05     |          |
| MISSOURI RELAY SURCHARGE                       |                        | .09      |          |
| CITY FRANCHISE FEE                             |                        | .14      |          |
| TOTAL OF TAXES                                 |                        |          | 2.70     |
| TOTAL Spectra                                  |                        |          | 100.05CR |

LINE NUMBER  
660-327-4558  
WTL - WORLDWIDE INC.

INTRALATA  
CARRIER CODE  
0555

INTERLATA  
CARRIER CODE  
0555  
1-800-444-3333

EXHIBIT

A