

**SALES MADE BY TELEPHONE**

**JH 1.10** Provide information about residential telemarketing sales made on behalf of Santanna by independent firms.

- JH 1.10a** Identify the telemarketing firms.
- JH 1.10b** Identify all responsibilities of the telemarketers and procedures used by them. Include an explanation of how Nicor Gas is notified of the request to switch.
- JH 1.10c** What sales incentives apply to telemarketers?
- JH 1.10d** Provide scripts used by telemarketers.
- JH 1.10e** Who is responsible for training telemarketers? Describe the training procedures.
- JH 1.10f** Describe all quality assurance procedures - including any disciplinary procedures.
- JH 1.10g** Who is responsible for quality assurance?
- JH 1.10h** Identify all materials that are provided to residential customers as the result of the telemarketing contact and when the materials sent.

**Response:** Santanna objects to this request because (a) it is vague and ambiguous, (b) it seeks to require Santanna to respond on behalf of persons and/or entities on behalf of whom or which Santanna has no authority to respond; and (c) it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to its objections, Santanna states that it has used the following telemarketers: Customer Acquisition Specialists of America, Inc.; Consumer Sales Solutions, Inc.; CTC Teleservices; Ecom Support Centers, Inc.; Energy Marketing Group; and Midwest Marketing Group. Santanna cannot detail all the procedures used by the telemarketers, but states that Santanna provides scripts and other informational material to the telemarketers for use in marketing on Santanna's behalf.

**OFFICIAL FILE**

13

ILL. C. C. DOCKET NO. 02-0441

Santanna Cross Exhibit No. 8

Witness \_\_\_\_\_

Date 8/28/02 Reporter CB

Telemarketing sales are conveyed to Santanna, which then submits consenting customers' accounts to the appropriate utility electronically for acceptance. Telemarketers are paid for each successful sale (\$25-\$35), which is determined by a customer being a Santanna customer 60 days after the account is submitted to Santanna. Telemarketers are trained by the telemarketing company, in part utilizing materials provided by Santanna, and Santanna reviews those materials with the telemarketers and is available for follow-up inquiries. Santanna cannot describe the training procedures in detail. For quality assurance, Santanna, *inter alia*, is in regular contact with the telemarketers for quality assurance purposes, randomly listens to telemarketing calls, receives recorded verifications and confirms use of provided scripts. Responsibility for quality assurance is shared by Santanna and the telemarketing companies. Santanna employees included in the quality assurance process are Doug Cueller, Debra Lucas, Lori Brosky, the Contract Administration Department and the Customer Service Department. Customers verbally authorizing Santanna to be their Alternative Gas Supplier receive a welcome letter from Santanna approximately one week later. They also receive written verification from their applicable utility, though Santanna cannot speak for the utilities. Disciplinary procedures have included, *inter alia*, invoking specific provisions of contracts, disciplining (including termination) specific telemarketers for complaints, putting telemarketing firms on probation for misconduct.