



REPORT ON TARIFF COMPLIANCE

For

US South Communications, Inc. d/b/a INCOMM

Ocala Exchange

October 13 – November 13, 2008

Division of Service, Safety & Consumer Assistance
January 27, 2009

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Engineering Specialists of the Florida Public Service Commission's Division of Service, Safety and Consumer Assistance conduct test calls of services provided by Interexchange Companies (IXCs) operating within the state of Florida. Section 364.04, Florida Statutes, states that a ". . . company shall file with the commission, and shall print and keep open to public inspection, schedules showing the rates, tolls, rentals, contracts, and charges of that company for service to be performed within the state." Florida statutes are implemented by rules and the rules that apply to IXCs are found within the Florida Administrative Code (F.A.C.) Specifically, Rule 25-24.485(g), F.A.C., states, "Companies shall charge only the rates contained in their tariff." Staff utilizes the tariff that is currently on file with the Commission during the tariff evaluation.

The evaluation objectives are (1) to evaluate a company's timing and billing through a series of automated test calls; and (2) to verify that a company is billing according to its tariff on file with the Commission.

During the period of October 13 – November 13, 2008, staff performed an evaluation on US South Communications, Inc., (US South). The test calls were conducted at a central office within the Ocala exchange and included testing and subsequent analysis of the following areas:

- Inter-LATA 1+ Timing Accuracy
- Inter-LATA 1+ Billing Accuracy
- Inter-LATA 1+ Billing per Tariff
- Inter-LATA Calling Card Timing Accuracy
- Inter-LATA Calling Card Billing Accuracy
- Inter-LATA Calling Card Billing per Tariff

During the evaluation, a series of test calls were generated to measure the timing of toll calls for billing analysis. To evaluate the accuracy of US South, all test calls were completed using a computerized timing tester. Calls were completed at each of the following timing intervals: 183, 182, 181, 180, 179, 178, 123, 122, 121, 120, 119, 118, 63, 62, 61, 60, 59, and 58 seconds.

Bills for these calls were analyzed and compared to the records generated by the tests for origination and time duration to develop the timing and billing accuracy summary. While the accuracy of our tests can be measured in hundredths of a second, we allow the company a tolerance of plus or minus one second.

I. Inter-LATA 1+ Timing Accuracy

Staff made 141 1+ test calls over US South’s network to verify timing accuracy. The test calls were made to numbers outside the Ocala exchange and outside the Gainesville LATA. The calls were direct dialed by dialing one plus the area code plus the seven-digit number. The results were that US South correctly timed 100 percent of the 1+ calls.

Table 1 Inter-LATA 1+ Timing Accuracy				
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed
Timing Accuracy				
1+	141	0	0	100%

II. Inter-LATA 1+ Billing Accuracy

The test calls that were evaluated for timing accuracy, found in Table 1, were used to verify the 1+ billing accuracy found in Table 2. The overall result was 100 percent billing accuracy.

Table 2 Inter-LATA 1+ Billing Accuracy				
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed
Billing Accuracy				
1+	141	0	0	100%

III. Inter-LATA 1+ Billing per Tariff

US South billed the 141 test calls with the timing increments and rates listed in the tariff. Staff concludes that US South billed per tariff.

IV. Inter-LATA Calling Card Timing Accuracy

Staff made 142 calling card test calls over US South’s network to verify the timing accuracy. The test calls were made to numbers outside the Ocala exchange and outside the Gainesville LATA utilizing US South’s calling card. US South correctly timed 39 calls, which resulted in 27.5 percent timing accuracy for its calling card calls. US South undertimed 103 of the calling card calls.

US South stated in its response that the calling card account was set up incorrectly. “[I]t was set up with the same billing increment as the 1+ service.” The timing increment that was set up for the calling card was a six second increment instead of the one minute increment listed in the tariff. US South verified that this error was only on the test account and did not affect any other customers. Staff will retest US South at a later date.

Table 3 Inter-LATA Calling Card Timing Accuracy				
	Total Number of Calls	Number of Calls Undertimed	Number of Calls Overtimed	Percent of Calls Correctly Timed
Timing Accuracy				
Calling Card	142	103	0	27.5%

V. Inter-LATA Calling Card Billing Accuracy

The same calls that were made for the calling card timing accuracy were also used to verify the calling card billing accuracy. US South billed 14 calls correctly resulting in 9.9 percent billing accuracy for its calling card calls. The calls were underbilled because US South used a slightly lower rate than what the tariff listed.

Table 4 Inter-LATA Calling Card Billing Accuracy				
	Total Number of Calls	Number of Calls Underbilled	Number of Calls Overbilled	Percent of Calls Correctly Billed
Billing Accuracy				
Calling Card	142	128	0	9.9%

VI. Inter-LATA Calling Card Billing per Tariff

US South did not bill the 142 calling card test calls based upon the timing increment listed in the tariff. US South billed the test calls at a slightly lower rate than what was listed in its tariff. Staff concludes that US South did not bill per tariff.