



REPORT ON TELECOMMUNICATIONS
SERVICE QUALITY

For

ITS TELECOMMUNICATIONS SYSTEMS, INC.

Indiantown Exchange

May 19 – June 6, 2008

Division of Service, Safety & Consumer Assistance

March 2, 2009

ITS Telecommunications Systems, Inc. Telecommunications Service Quality Report

Summary

Staff performed a service evaluation on ITS Telecommunications Systems, Inc. (ITS), during the period of May 19 – June 6, 2008. ITS is a small local exchange company that has one exchange, Indiantown. The categories staff evaluated were as follows:

- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes a Directory Review and New Numbers in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops, Transmission
- Repair Service, which includes Out-of-Service (OOS) Restored within 24 Hours, Service Affecting (SA) Restored within 72 Hours, and Rebates
- Periodic Report Review
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+ and calling card, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions

The service evaluation objectives are (1) to evaluate a company's performance based on service quality rules and standards; (2) to verify the service results the company reported to the Commission on a periodic basis; and (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations.

ITS met the rule requirements in the following categories:

- Answer Time
- New Numbers in Directory Assistance
- Availability of Service (Installation)
- Repair Service – Service Affecting (SA) Restored within 72 Hours
- Safety – Ground Deficiencies
- Timing and Billing Accuracy for Directory Assistance Billing
- 9-1-1 Emergency Voice call completions

In the periodic report review, staff examined the year 2007 for the exchange being evaluated and found that the reports required by rule were in agreement with the records that were examined except for two instances. In the Availability of Service, for the third quarter of 2007, the company's periodic report stated 100% of the orders were installed within three days. The evaluation indicated the company completed 91.7% of the orders within three days. In the Repair Service – OOS restored within 24 hours, for the first quarter of 2007, the company's

periodic report stated the company cleared 100% of the out-of-service repair tickets within 24 hours. The evaluation revealed the company cleared 90.7% of the OOS repair tickets within 24 hours.

Staff also researched service quality complaints concerning ITS and for the year 2007, it did not have any service quality complaints. Since the last evaluation in 2000, ITS had one service quality complaint in 2001, one service quality complaint in 2004, and one service quality complaint in 2006.

Staff found deficiencies in several other categories listed below. Where the company did not meet the standards, ITS was notified by the draft report.

Adequacy of Directory Services:

Directory Review:

Staff reviewed ITS' telephone directory labeled "Indiantown" dated July 2007. The toll-free Florida Relay Service (FRS) number was not listed in the alphabetical listings. This is a repeat finding from the 2000 service evaluation report. The amount for Directory Assistance (DA) was not listed in the directory. The amounts for Line Verification, and Emergency Line Interrupt did not match the prices listed in the company's tariff. The telephone directory listed the prices for the Line Verification and Emergency Line Interrupt as \$2.50 and \$5.00, respectively. The tariff listed the prices for Line Verification and Emergency Line Interrupt as \$0.35 and \$0.75, respectively. The tariff pages listing the rates for Line Verification and Emergency Line Interrupt are effective January 31, 1992. Staff believes the tariff pages have not been updated to reflect the current prices and possible refunds may be due.

Corrective Action:

ITS stated in its response that beginning with the July 2009 directory, it "will confirm on an annual basis that the FRS toll-free number is included in the alphabetic listings." Also, ITS will confirm the amount for DA is listed in the directory. ITS stated that it does not provide operator services and depends on AT&T for the services. "A tariff change has been filed to reflect the current AT&T tariff rate for these services."

ITS researched its records back to March 2006 and, after a careful review of these records, ITS found that it has not billed any customers for the Line Verification and Emergency Line Interrupt services. ITS "did find a very small amount of files that contained Line Verification and Emergency Line Interrupt charges from [AT&T]. ITS did not bill [its] customers for the charges due to missing data in [its] billing system." This error has been corrected. "ITS has also made the appropriate change in [its] [t]ariff and any charges for these services will be billed to [its] customers at the correct rate."

Subscriber Loops:

Transmission:

In the Indiantown exchange, 100 loops were tested for transmission requirements. Three of those loops were deemed unsatisfactory. In one instance, the drop wire was connected directly to the customer's inside wire without being connected to the company's Network Interface Device (NID). In addition, the loop did not have a ground. Staff was not able to perform any measurements because the loop was not properly installed. The two other loops had high noise and poor balance readings causing the loops to be classified as unsatisfactory.

Corrective Action:

ITS corrected the three loops that were deemed unsatisfactory. One loop "was noted as having the drop wire connected directly to the customer's inside wire without being connected to the company's NID. This was resolved by placing a new NID and properly grounding" the loop. The other two loops "were noted as having high noise and poor balance readings. These were corrected by cutting down on the power influence by proper[ly] bonding and grounding" the loops.

Repair Service:

Out-of-Service Reports restored within 24 Hours:

Staff reviewed the year of 2007. For the first quarter, staff found that ITS had 129 out-of-service repair tickets for the Indiantown exchange. Only 117 of those tickets were cleared within rule requirements. This resulted in 90.7%. The rule requirement is 95% cleared within 24 hours for the quarter.

Rebates:

During the repair ticket review, staff found that 33 rebates should have been credited to customers for being out of service greater than 24 hours. None of the 33 rebates was made. ITS stated that a new billing system was implemented in April 2006. A new repair clerk was hired in September 2008. ITS stated, "[d]uring her training and use of the system, we found that the auto date/time would fluctuate based on how the ticket was closed out. For example: Saving the cleared ticket, but not exiting the ticket and then saving again or closing could cause the date/time to change. This, in turn, gives a false read on the actual ticket time closing." ITS stated it is in the process of researching all the repair tickets from April 2006, to September 2008, for repair tickets that have a false close time and will provide the required rebates to those customers.

Corrective Action:

ITS stated that 31 of the 33 customer requiring a rebate will be given the rebate. Two accounts are closed. The total amount rebated to the affected customers was \$210.42. ITS is still researching the repair tickets from April 2006 to January 2007 and January 2008 to September 2008. ITS stated “[a]s previously noted, ITS has made changes in our procedures to assure that our system properly records the closing of the repair tickets as we believe our procedure was the cause for the discrepancy in out-of-service records.”

9-1-1 Emergency Service:

TDD Calls:

Staff made 50 calls to 9-1-1 services using the Telecommunications Device for the Deaf (TDD). Two of the calls failed to complete. For one test call, there was no answer and the 9-1-1 operator did not receive the call. The other call went to a fast busy. This resulted in 48 calls completing to 9-1-1 services through the TDD, which is 96% completion. The rule requirement is 100%-completed calls to 9-1-1 services.

Corrective Action:

ITS stated that it “has performed additional test calls to 9-1-1 using the Telecommunications Device for the Deaf (TDD) and each of the test calls made resulted in successful connection to emergency services.”

Immediately following the summary is a series of charts depicting the results of the categories that were evaluated. In the instances where ITS failed to meet the established standard, the results are highlighted in yellow.

ITS Telecommunications Systems, Inc. Telecommunications Service Quality Report

Charts

Answer Time - Business Office						
	Total Calls	Calls Failed	% of Calls Offered	Calls Answered	Calls Answered in 55 sec.	% Answered w/i Std.
Voice	150	0	100.0%	150	150	100.0%
TDD	50	0	100.0%	47*	46	97.9%

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant.

Rule 24-4.073 (b) and (c) F.A.C., Answering Time applies.

* There were three calls that were busy for the business office TDD.

Answer Time - Repair Service						
	Total Calls	Calls Failed	% of Calls Offered	Calls Answered	Calls Answered in 55 sec.	% Answered w/i Std.
Voice	150	0	100.0%	150	149	99.3%
TDD	50	0	100.0%	48*	47	97.9%

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant.

Rule 25-4.073 (b) and (c) F.A.C., Answering Time applies.

* There were two calls that were busy for the repair service TDD.

Directory Reviewed			
Name / Date of Directory	Total Items Reviewed	Items in Compliance with Std.	% of Items in Compliance with Std.
Indiantown July 2007	21	18	85.7%

Standard: 100% of the items reviewed for the directory shall comply with Rule 25-4.040 F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons.

DID NOT MEET STANDARD

New Numbers in Directory Assistance			
Calls Made to DA	Requests for Numbers	Total found in DA	% Found in DA
2	2	2	100.0%

Standard: 99% of new service orders shall be listed in Directory Assistance (DA) within 48 hours of competition of the order. Rule 25-4.040 (5) F.A.C., Telephone Directories; Directory Assistance applies.

Availability of Service (Installation) - 1st Qtr 07						
Exchange	Total Orders Reviewed	Orders Excluded	Orders Delayed for Const.	Net Orders	Orders Completed w/i Std.	% Orders Completed w/i Std.
Indiantown	72	1	0	71	71	100.0%

Availability of Service (Installation) - 2nd Qtr 07						
Exchange	Total Orders Reviewed	Orders Excluded	Orders Delayed for Const.	Net Orders	Orders Completed w/i Std.	% Orders Completed w/i Std.
Indiantown	87	0	0	87	86	98.9%

Availability of Service (Installation) - 3rd Qtr 07						
Exchange	Total Orders Reviewed	Orders Excluded	Orders Delayed for Const.	Net Orders	Orders Completed w/i Std.	% Orders Completed w/i Std.
Indiantown	49	1	0	48	44	91.7%

Availability of Service (Installation) - 4th Qtr 07						
Exchange	Total Orders Reviewed	Orders Excluded	Orders Delayed for Const.	Net Orders	Orders Completed w/i Std.	% Orders Completed w/i Std.
Indiantown	63	1	0	62	61	98.4%

Standard: 90% of Services Orders shall be completed within 3 days, on the appointment day, or on the customer request if greater than 3 days. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.066 F.A.C., Availability of Service applies.

Subscriber Loops - Transmission				
Exchange	Total Loops Tested	Number of Unsatisfactory Loops	Number of Satisfactory Loops	% of Satisfactory Loops
Indiantown	100	3	97	97.0%

Standard: 98% of loops tested shall have satisfactory transmission requirements. Rule 25-4.072 F.A.C., Transmission Requirements applies.

Out-of-Service Reports Restored Within 24 Hours - 1st Qtr 2007					
Exchange	Reports Reviewed	Excluded Reports	# of OOS Reports	# of OOS Reports Cleared w/i 24 Hrs.	% of OOS reports Cleared w/i Std.
Indiantown	186	16	129	117	90.7%

Out-of-Service Reports Restored Within 24 Hours - 2nd Qtr 2007					
Exchange	Reports Reviewed	Excluded Reports	# of OOS Reports	# of OOS Reports Cleared w/i 24 Hrs.	% of OOS reports Cleared w/i Std.
Indiantown	225	13	164	157	95.7%

Out-of-Service Reports Restored Within 24 Hours - 3rd Qtr 2007					
Exchange	Reports Reviewed	Excluded Reports	# of OOS Reports	# of OOS Reports Cleared w/i 24 Hrs.	% of OOS reports Cleared w/i Std.
Indiantown	260	15	196	187	95.4%

Out-of-Service Reports Restored Within 24 Hours - 4th Qtr 2007					
Exchange	Reports Reviewed	Excluded Reports	# of OOS Reports	# of OOS Reports Cleared w/i 24 Hrs.	% of OOS reports Cleared w/i Std.
Indiantown	200	18	138	135	97.8%

Standards: 95% of Out-of-Service Repair Tickets shall be cleared within 24 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Service Affecting Reports Restored Within 72 Hours - 1st Qtr 2007			
Exchange	# of SA Reports	# of SA Reports Cleared w/i 72 Hrs.	% of SA Reports Cleared w/i Std.
Indiantown	41	41	100.0%

Service Affecting Reports Restored Within 72 Hours - 2nd Qtr 2007			
Exchange	# of SA Reports	# of SA Reports Cleared w/i 72 Hrs.	% of SA Reports Cleared w/i Std.
Indiantown	48	47	97.9%

Service Affecting Reports Restored Within 72 Hours - 3rd Qtr 2007			
Exchange	# of SA Reports	# of SA Reports Cleared w/i 72 Hrs.	% of SA Reports Cleared w/i Std.
Indiantown	49	49	100.0%

Service Affecting Reports Restored Within 72 Hours - 4th Qtr 2007			
Exchange	# of SA Reports	# of SA Reports Cleared w/i 72 Hrs.	% of SA Reports Cleared w/i Std.
Indiantown	44	44	100.0%

Standards: 95% of Service Affecting Repair Tickets shall be cleared within 72 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Repair Service Rebates Required by Rule			
2007 Month	Rebates Due	Rebates Given	% of Rebates Given
January	6	0	0.0%
February	2	0	0.0%
March	5	0	0.0%
April	4	0	0.0%
May	0	0	N/A
June	3	0	0.0%
July	3	0	0.0%
August	3	0	0.0%
September	3	0	0.0%
October	3	0	0.0%
November	0	0	N/A
December	1	0	0.0%

Standard: 100% of the rebate shall be automatically credited to the customer if the service remains out-of-service in excess of 24 hours computed on a continuous basis, Sundays and holidays included. Rule 25-4.070 (1)(b), F.A.C. Customer Trouble Reports applies.

Safety - Ground Deficiencies			
Exchange	Loops Tested	Poor Grounds	% of Adequate Grounds
New Installs			
Indiantown	2	0	100.0%
Random Loops			
Indiantown	98	3	96.9%

Standards: 100% of new service installations shall have adequate grounding on the loops.
92% of randomly inspected loops shall have adequate grounding. Rule 25-4.038, F.A.C. Safety applies.

Timing and Billing - Directory Assistance								
Central Office	Telephone Number	Calls Made	Allowance	Billable Calls	Calls Billed	Variance	% Correctly Billed	Billed per Tariff
Indiantown	772-597-9701	2	3	0	0	0	100.0%	Y

Standard: 97% of calls to DA shall be billed correctly and in accordance with the company's tariff on file with the Commission. Rule 25-4.077 Metering and Recording Equipment, and Rule 25-4.115, F.A.C., Directory Assistance applies.

9-1-1 Emergency Service						
Area	NXX	Calls Made	Busy Calls	Failed Calls	Calls Completed	% of Calls Completed
Voice Calls						
Indiantown	597	150	0	0	150	100.0%
TDD Calls						
Indiantown	597	50	0	2*	48	96.0%

Standard: 100% of calls to 911 Emergency Service shall be completed by the company. Rule 25-4.081, F.A.C. Emergency 911 Access applies.

* There was one call that was busy and one call that was not received for the 9-1-1 TDD